

**TOWN AND COUNTRY PLANNING ACT 1990  
SECTION 78 APPEAL**

**BY**

**CAREBASE LIMITED**

**PROOF OF EVIDENCE – PLANNING  
APPENDICES**

**MARK BATCHELOR BSc (Hons), MSc, MRTPI**

**2, 4, 6 and 8 Danson Road  
Bexleyheath  
Kent  
DA6 8HB**

**PINS REF: APP/D5120/W/22/3293225  
LPA REF: 19/03072/FULM**

November 2022

## **APPENDIX LIST**

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# APPENDIX 1

To: **Carebase Ltd.**  
**C/o Boyer Planning, Miss A. Bamford**  
**2nd Floor, 24 Southwark Bridge Road**  
**London**  
**SE1 9HF**

**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)**  
**(ENGLAND) ORDER 2015**

**REFUSAL OF PERMISSION  
TO DEVELOP LAND**

Reference Code :  
**19/03072/FULM**

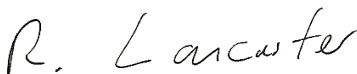
**TAKE NOTICE** that Bexley Council, the Local Planning Authority under the Town and Country Planning Acts, **HAS REFUSED TO PERMIT** the development of land situated at :

2, 4, 6 And 8 Danson Road  
Bexleyheath  
Kent  
DA6 8HB

For 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.

Referred to in the application for permission for development received on 23rd December 2019, and that the grounds for such refusal are as attached.

**Date of Decision : 30th November 2021**



**Head of Development Management**

**REASON(S) FOR REFUSAL**

- 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 policies ENV39 and H3 of the Bexley Council Unitary Development Plan (2004) and Paragraph 130 and 134 of the National Planning Policy Framework (2021).
- 2 The proposed development by reason of the intensity of vehicular movements and its location would have a detrimental impact on highway safety and congestion, contrary to policy T4 of the London Plan (2021), CS15 of the Bexley Core Strategy (2012), saved policy T6 of the Bexley Council Unitary Development Plan (2004) and Paragraph 110 and 111 of the National Planning Policy Framework (2021).
- 3 The proposed development provide insufficient parking for the use in this location. This would cause increased on-street parking stress, detrimental to the amenities of local residents, contrary to saved policy T17 of the Bexley Council Unitary Development Plan (2004).
- 4 The proposed development, by reason of the position, height, bulk and scale would harm the setting of and result in less than substantial harm to, Danson Park, a Grade II Registered Park and Garden and designated heritage asset. It is not considered that this harm would be outweighed by the public benefits required by paragraph 202 of the National Planning Policy Framework (2021). The proposed development is therefore contrary to policy HC1 of the London Plan (2021), CS07 and CS19 of the Bexley Core Strategy (2012), saved policies ENV39 and H3 Bexley Council Unitary Development Plan (2004) and Paragraph 199 and 202 of the National Planning Policy Framework (2021).
- 5 The proposed development results in the loss of the four family dwelling houses which is not outweighed by the benefits of the scheme, including the provision of 70 car homes beds, contrary to Policies H8 of the London Plan (2021) and policies CS01 and CS03 of the Bexley Core Strategy (2012).
- 6 The proposed development by reason of its position and built form would result in loss of sunlight an overbearing impact on 1 Danson Mead, detrimental to the amenities of the occupiers of this property and contrary to saved policy ENV39 Bexley Council Unitary Development Plan (2004) and Paragraph 130 of the National Planning Policy Framework (2021).

**PLEASE NOTE**

In dealing with this planning application, Bexley Council has worked with the applicant in a positive and proactive manner, in accordance with the requirements of paragraphs 186 & 187 of the National Planning Policy Framework, to seek solutions to problems where practicable. Detailed advice is available in the form of the Council's Development Plan as well as in the Mayor of London's and Bexley Council's Supplementary Planning Documents and Guidance. The Council also offers a full pre-application service that is available to all applicants to assist in formulating their proposals.

**APPEALS**

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or if granted subject to conditions, then you can appeal to the Secretary of State. More details of the time limits for appeals and how you go about appealing along with Purchase Notices can be found on the following websites:

<https://www.gov.uk/government/organisations/planning-inspectorate>

<https://www.planningportal.co.uk/info/200207/appeals>

## **APPENDIX 2**

## MAJOR APPLICATIONS

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**APPLICATION NO.:** 19/03072/FULM

**ADDRESS:** 2, 4, 6 and 8 Danson Road, Bexleyheath, DA6 8HB

**SUMMARY DESCRIPTION:** 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.

**APPLICANT:** Carebase Ltd

### SUMMARY

This is a planning application for the 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. The key issues to consider include the principle of the development- land use, impact on character and appearance of the area, impact on neighbouring amenity, quality of accommodation, highways and refuse, trees, environmental considerations, fire safety and response to representations

### RECOMMENDATION

Grant planning permission subject to conditions and the entering into a Section 106 agreement.

### REASONS FOR RECOMMENDATION

The proposed redevelopment to provide a 70-bed care home is considered to be acceptable in principal, design and impact on neighbour amenity. There are no highway or environmental issues sufficient to warrant refusal on highway grounds. There are also not any adverse impacts resulting from the scheme that would significantly outweigh the benefits of the scheme in providing 70 beds for dementia and end of life care.

### NOTE

This summary is not intended to be a comprehensive review of all the issues in relation to this application.

### SITE AND SURROUNDINGS

The application site is located on the western side of Danson Road the northern and western boundaries of the site bordering Danson Park, a Grade II Historic Park and Garden. The northern boundary abutts the entrance to the park.

The application site consists of two pairs of semi-detached properties, which would be demolished. Both pairs of semi-detached properties are set in a staggered line, with nos. 2/4 set some 8.4 metres further forward than nos. 6/8 Danson Road. Nos. 6/8 Danson Road are set some 2.6 metres behind no. 10 Danson Road. Both pairs of



## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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semi-detached properties have deep frontages and are set back from the public highway.

Across the wider street scene Danson Road consists of a mixture of detached and semi-detached properties of various design, scale and mass. All properties sit on reasonably large plots and all are set back from the public highway.

#### Designations

- London Distributor Road.
- Primarily Residential Use.
- Bexleyheath & Crayford Area of Archaeological Search.
- Borough wide Article 4 relating to HMOs.

## PROPOSAL

This application seeks planning permission for the demolition of nos. 2-8 Danson Road and the erection of a part one, part two, part three storey building with basement in order to provide a 70 bedroom nursing home for high dependency residents with Dementia and end of life care needs (Use Class C2).

The proposed building would be set back from the public footpath by between 10 and 19 metres. The part of the building fronting Danson Road would be part two, part three storeys in height and would have a maximum height of approximately 11 metres.

The portion of the building running parallel with the main entrance to Danson Park would be two storey in nature with a height of approximately 8 metres.

In terms of floor layout each floor would contain the following:

#### *Basement*

- 16 bedrooms with a floor area of between 16 and 18sq.m and all with en-suites.
- A central garden courtyard.
- Nurse room.
- A treatment room.
- An assisted bathroom.
- Two day space areas.
- Utility cupboards.
- Staff changing rooms and showers.
- Food store.
- Kitchen.
- Laundry room.
- WC.
- Plant room.
- Private dining room.
- Comms room.

## MAJOR APPLICATIONS

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#### *Ground Floor*

- 20 bedrooms with a floor area of between 16 and 18sq.m with en-suites.
- Service lift.
- Private dining room.
- Cinema room.
- Salon.
- Day space.
- Dining room.
- Visitor WC.
- Reception.
- Managers/Admin Office
- Hoist room.
- Reading room.
- Orangery.

#### *First Floor*

- 25 bedrooms with a floor area of between 16 and 22sq.m with en-suites.
- Assisted bathroom.
- Treatment room.
- Nurses room.
- Utility cupboards
- Private terraces.
- Writing rooms.
- WC

#### *Second Floor*

- 9 bedrooms with a floor area of between 16 and 22sq.m with en-suites.
- Two day spaces.
- Nurse room.
- Treatment room.
- Utility cupboards.
- Assisted bathroom.
- Terrace.

To the rear there would be a sensory garden, a formal terrace, and a patio/small garden. The basement would include a courtyard garden. This would be predominantly hardstanding with some planting. Additional soft planting is proposed along the boundaries.

Seventeen (17) car parking spaces would be provided, and a refuse and recycling store would be situated in the northeast corner of the site. Bicycle parking for sixteen (16) bicycles would be provided.

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Approximately twenty-four (24) staff would be on site with the following working hours:

*Daytime (7 days a week):*

- 14 care staff (nurses and carers) (7am to 7pm)
- Housekeeping team x 3 (8am to 4pm)
- Chef (8am to 4pm)
- Kitchen assistant (8am to 8pm)
- Lifestyle Co-ordinator (9am to 5pm)
- Administrator/weekend receptionist (9am to 5pm)

*Daytime (Mon – Fri only):*

- Manager (9am to 5pm)
- Deputy (9am to 5pm)
- Maintenance (9am to 5pm)

*Night time (7 days a week):*

- 7 care staff (nurses and carers) (7pm to 7am)
- Deliveries tend to be in the mornings (food, medical supplies etc), and usually only Monday to Friday.

As part of the service a GP will be retained by the applicant for the development.

## **CONSULTATIONS**

### Highway Authority

The proposal site lies on the western side of Danson Road a short distance to the south of the traffic signal-controlled junction with Crook Log and Park View Road, which are all classified roads and designated as London Distributor Roads within the Council's Unitary Development Plan (UDP) road hierarchy. On street car parking is controlled by yellow line waiting restrictions that operate between 8am and 6.30pm Monday to Saturday. The site has a PTAL of 3-4 (Moderate-Good) with 9 bus routes within the specified walking distances for PTAL calculation.

The Highway Authority considers all possible material highway impacts have been fully assessed and found to be acceptable and therefore has no objections subject to the imposition of conditions.

### Environmental Health

The applicant has submitted a Noise Assessment of the proposals undertaken by a specialist acoustic consultant. Subject to the implementation of measures in the Noise report and conditions relating to demolition and construction, no objections from EH.

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#### Housing

Bexley's Strategic Housing Market Assessment 2020 suggests the vast majority of people want to remain in their own home with support when needed. The SHMA shows there is a need for affordable specialist older persons accommodation where people can live independently but there is exceptionally low demand for additional residential care homes in the borough.

#### Drainage

A flood risk assessment has been provided for this site. The site lies in flood zone 1 and is deemed acceptable development for the vulnerability type.

No objections raised subject to a condition requiring further details relating to run off rates and volumes of water being reused on site particularly given the limited outdoor space for gardening.

#### Parks and Open Space/Trees

No objections, subject to conditions.

#### Land Contamination

No objections subject to a condition for a watching brief.

#### Refuse

As refuse will be collected privately, no objection is raised.

#### NHS London Healthy Urban Development Unit

A contribution of £130,235 is required in order to mitigate the pressures of the development may have on the NHS.

#### NHS Bexley CCG

NHS Bexley CCG would like to develop an extra care offer for older people in the borough, rather than have more residential and nursing homes. An assessment of the comments are made in the main body of the report.

#### Thames Water

#### *Waste comments*

Thames Water would advise that with regard to foul water sewage network infrastructure capacity, we would not have any objection to the above application based on the information provided.

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With regard to surface water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

#### *Water comments*

The proposed development is located within 15m of a strategic water main. Thames Water request that a piling condition be added to any planning permission. With regard to water network and water treatment infrastructure capacity, there would not be any objection.

#### London Fire Brigade

An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes, will be provided.

This is without prejudice to any requirements or recommendations that may be made by the Authority under the Regulatory Reform (Fire Safety) Order 2005/Petroleum (Consolidation) Act 1928, the local authority or the Health and Safety Executive.

#### Met Police

The development as a whole has been carefully planned so that it takes due account of recognised good practice relating to its overall design and relationship to the outside. All parking areas will be overlooked with windows from the elderly home. There will be appropriate internal security measures with window locks and doors appropriately alarmed throughout. Blank corners or blind spots are avoided wherever possible.

Some issues have been raised with regard to the proposed boundary fence needing to be security rated and keypads being possibly broken. A Secured by Design condition is requested.

#### Historic England Archaeology

The application documentation includes an archaeological desk-based assessment report dated December 2019 by Archaeology Collective in respect of the above site. The report identifies that the main focus of potential is with Roman archaeology given the proximity of the site to Watling Street, a Roman road. Given the evidence available, it is concluded that given the medium potential for archaeology to be present that the on-going interest can be secured by condition.

The development could cause harm to archaeological remains. However, the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

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#### Garden Trust

We object to this application, which will impose substantial harm on the setting of Danson Park, and in particular its historic main entrance and avenue, which are described in detail in the Historic England Register entry.

We do not object to the principle of a new building following the current line along Danson Road. We do however categorically object to the proposed building that stretches along the Danson Park entrance drive into the park.

The proposal implies that it will offer an improvement on the current back garden buildings by drawing back from the hedge line, but clearly instead it replaces low key domestic buildings of a semi-temporary nature with a large and imposing permanent structure within the immediate setting of a key features of a nationally designated heritage asset.

Danson Park plays an important role in the local community not only as an open green amenity space but as a publicly owned and accessible heritage asset of national importance. It is quite extraordinary that the application's Design and Access Statement should present this proposal for a commercial private care home as 'another amenity for the residents of Danson Park', when in fact it has a substantially detrimental impact on the existing and fully-public amenity.

The National Planning Policy Framework is clear that 'substantial harm to ... Grade II registered parks or gardens should be exceptional' (NPPF paragraph 194) [of the 2019 NPPF which is now paragraph 200 of the NPPF 2021], and that impact on a park's setting constitutes harm.

## REPRESENTATIONS

Letters from 34 households were received during the initial neighbour notification period. Due to additional details relating to right turn mitigation measures being provided a 14 day renotification period was undertaken.

Letters from 16 households, 6 of which had not previously objected, were received raising the following summarised new material planning considerations. Comments from both notification periods are summarised below:

- There is a housing shortage and this proposal results in the loss of four family homes. There is no obvious reason for this location.
- The development is not appropriate in this residential area. Danson road, Bean Road, Danson Mead fall within the Bean Estate and are covered by the Bean Estate that does not allow commercial business development. Danson Road was given a planning restriction of proposed redevelopment this falls well outside those restriction - how has this application got this far???
- Overdevelopment of the site, out of character with its surroundings.
- The Council has prevented rear extensions in Danson Road, how is this

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### APPLICATION NO. 19/03072/FULM (cont'd)

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- allowed?
- The development is an eyesore.
- The development does not offer enough rooms for local residents- it should all be for locals.
- Impact on local GP services.
- Loss of amenity- Daylight, Sunlight, Privacy, Outlook, odours, poor air quality (pollution) and Noise disturbance (from the construction and future use).
- Detrimental impact on Danson Park and wildlife. The proposal results in the loss of access to Danson Park at this end.
- The development will set a precedent for flatted developments and businesses.
- Impact on highways- This is a very busy road and there have been many accidents particularly at the traffic light junction to the north which is a blackspot. The development will increase the risk of accidents. The no right hand turn measures cannot be enforced and are insufficient. There are a number of schools nearby as well which already affect the highway. Reducing the number off access from four to two will not help given the proposed use. Other development on Danson Road have been refused because of access and egress onto Danson Road.
- Not enough parking provided for visitors, staff or deliveries.
- Danson Road is used by emergency services and this development will hinder those services.
- The basement will increase the risk of flooding in the area.
- The bin location to the front will be unpleasant.
- There are already enough care homes in the borough.
- The development would not necessarily free up homes.
- Is the applicants resident survey accurate? Has it been checked?
- Impact on property values.

**Cllr O'Neill** has objected to this application stating:

*"I would like to record my continued concerns about this application. I do recognise that Carebase have made changes to the initial plans resulting from their conversations/consultation & that the consultation showed that local residents thought there was a need for such a resource.*

*My concerns are;*

- *that family housing is being replaced the build on the footprint will be more dense than the current houses that it's hard to imagine that the vehicle movements will be in the same in number as those for the existing houses despite the reduction of crossovers.*
- *that the traffic on Danson Road at the junction is generally already very busy*
- *The no right hand turn into Danson Road will be difficult to police &*
- *that the parking on the site will be sufficient for both employees & visitors despite assurances being given."*

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- *Extreme concern about the disruption caused by demolition (especially excavation of a basement) & the traffic movements as a result thereof.*
- *Concern about the excavation & impact on surrounding area given I understand there are no other excavated areas.*
- *Whether the construction is compliant with the Local Plan in that area.*

**Cllr Camsey** has objected to this application stating:

*It is very clear that this development would cause numerous problems being so near to a very busy junction, namely:*

- *although the number of entrances will be reduced, nevertheless there will be increased vehicle access such as visitors, staff, medical support, ambulances.*
- *the traffic currently is very busy with tailbacks already occurring down Danson Road for some considerable distance. This would be increased.*
- *it is a bus route and increased traffic will have impact on timetables, affecting other road users.*
- *there is no guarantee that visitors leaving the site would observe the 'no right turn' further adding to tailbacks in both directions and road safety.*
- *there will be insufficient parking on site impacting on surrounding roads. Danson Park is very popular with residents, particularly during the summer months, and there is already huge pressure on Danson Road and surrounding roads as there is little parking within the Park boundary and this is already used by visitors to Danson House or The Stables restaurant.*
- *the remainder of Danson Road consists of family housing and this development would be out of character.*

*Whilst I appreciate that the application will be determined on Planning grounds, I wish my concerns to be recorded."*

**Cllr Betts** objected to this application stating:

*This is a totally inappropriate development for this busy Junction site. The extra traffic that will be generated by staff and visitors to this 70 bed home could be as many as 30 to 40 times more than the current traffic movements.*

*The junction here is already very congested being one of only 3 north/south routes in the Borough. Even if the development were to be on just the present footprint it would create movement problems with traffic here.*

*The character of this area is defined by larger family properties and we should do all we can to retain this. This proposal will also have a huge visual impact on one of London's most prized public parks and the Council has a responsibility to protect Danson Park from any threat such as this unwelcome and unwanted development."*



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**The Bexley Civic Society** has objected to this application stating:

Our overall position that this development damages the visual amenity of the entrance to this historic park and is over development of the site.

It is quite ridiculous to suggest that this is sufficient for staff, deliveries of food, laundry etc, rubbish collection, plus minibuses for outings, visiting medical and personal care staff. The additional traffic caused by visitors failing to get parked and having to trawl local roads in ever widening circles has been ignored in all the figures.

#### **Support**

As part of this application the applicants have submitted their own public questionnaires. 41 surveys have been submitted which support this application. The developer has also submitted a Statement of Community involvement which shows a public exhibition, meetings with ward members and canvassing (of 111 residents living around the application site) occurred.

The results of the public engagement show that there is support for this application. 56% either agree or strongly agree that there is the need for high-quality care homes for the elderly in Bexley and overall, 53% either agree or strongly agree that this proposal should be supported.

## **RELEVANT PLANNING HISTORY**

There is no planning history relevant to this application.

## **PLANNING POLICIES**

### **Development Plan**

#### **London Plan (2021)**

GG1: Building strong and inclusive communities.

GG2: Making the best use of land.

D1: London's form, character and capacity for growth.

D3: Optimising site capacity through the design-led approach.

D4: Delivering good design.

D5: Inclusive design.

D7: Accessible housing.

D12: Fire Safety.

D14: Noise.

H8: Loss of existing housing and estate redevelopment.

H13: Specialist Older Persons Housing.

S1: Developing London's social infrastructure.

S2: Health and social care facilities.

SI1: Improving air quality.

SI2: Minimising greenhouse gas emissions.

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SI4: Managing heat risk.  
SI5: Water infrastructure.  
SI13: Sustainable drainage.  
T1: Strategic approach to transport.  
T4: Assessing and mitigating transport impacts.  
T5: Cycling.  
T6: Car Parking

#### Core Strategy (2012)

CS01: Achieving Sustainable Development.  
CS07: Welling Geographic Region.  
CS08: Adapting to and Mitigating the Effects of Climate Change.  
CS10: Housing Need.  
CS13: Access to Jobs.  
CS15: Achieving an integrated and sustainable transport system  
CS16: Reducing the need to travel and the impact of travel.  
CS17: Green Infrastructure.  
CS18: Biodiversity and geology  
CS19: Heritage and Archaeology  
CS21: Supporting Community Infrastructure and Services.

#### Unitary Development Plan (2004) (saved policies)

G15: Areas for primarily residential use.  
G17: Sustainable transport  
ENV35: Trees and hedges- planting, protection and retention.  
ENV39: Built Environment.  
H3: Character of Local Residential Area.  
T1: Applications for Major Developments- travel plans.  
T2- Applications for Major Developments- full transport assessments  
COM4- Health Care Facilities

#### Other Material Considerations

NPPF (2021).-Paragraph 62 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'.

Bexley's Strategic Housing Market Assessment (2020).  
Bexley Drainage Design and Evaluation Guide (2018).

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#### ASSESSMENT

The key issues to consider are:

- Principle of the development- Land Use,
- Impact on character and appearance of the area,
- Impact on neighbouring amenity,
- Quality of Accommodation,
- Highways and Refuse,
- Archaeology,
- Trees,
- Environmental Considerations,
- Fire Safety,
- Other issues and Response to representations

#### **Principle of the development- Land Use**

##### *Loss of residential dwellings (Use Class C3) and Redevelopment to provide a care home (Use Class C2)*

The application site is located within an area designated for Primarily Residential Use.

Policy H8 of the London Plan (2021) seeks to protect existing housing from being lost unless it is replaced with new housing at existing or higher densities. In this instance the proposed development would see the loss of four family dwelling houses to be replaced with a 70 bedroom care home for those with Dementia and needing end of life care.

London Plan Policy is largely silent specifically on the principle of such uses. Similarly, there are no policies within either the adopted Unitary Development Plan and/or the Council's Core Strategy which specifically deals with Care Homes/ Nursing Homes.

The NPPF is clear that where there are no relevant development plan policies, permission should be granted unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Whilst there is no policy directly related to care home provision, the supporting text of Policy H13 of the London Plan (2021) recognises that care home accommodation is an important element of the suite of accommodation options for older Londoners and this should be recognised by boroughs and applicants. There is an emphasis on providing Care Quality Commission rated Good or Outstanding care home beds is growing at

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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.

Paragraph 4.13.13 of the London Plan (2021) states that “*Dementia does not just affect older people; however, the total number of older people with dementia in London is forecast to rise from 73,825 in 2017 to 96,939 in 2029, an increase of 31 per cent. Methods of offering support for people with dementia have improved in recent years, as have accommodation options. There is currently no clear evidence identifying the best method of provision of dementia care or accommodation, and it is likely that a range of solutions will continue to develop. Boroughs should consider the need for accommodation for people with dementia within specialist older persons housing developments.*”

Paragraph 4.13.14 of the London Plan (2021) states that “*Care home accommodation (C2) is an important element of the suite of accommodation options for older Londoners and this 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. If the rates of supply and demand remain constant it should be possible to meet potential demand for both care home beds and dementia care home beds.*”

As a result of the above the Council is required to provide 145 bedrooms for specialist older persons housing per annum between 2017-2029 (table 4.3 of the London Plan 2021). Given the number of rooms proposed this development would provide nearly half (48%) of the boroughs yearly requirement in one go.

As part of this application the applicants have submitted a demographic needs analysis. Within the London Borough of Bexley, the report states that there are a total of 22 Care/Nursing homes which provide a total 1,335 beds and that based on the national trends it is considered that there will be a deficit of 661 bedrooms by 2028.

The report states that within Bexley it is estimated that there are 2,654 people aged 65 or over living with dementia and this is expected to rise to 4,659 over the next 20 years (an increase of 75%).

The Councils Housing department have reviewed this proposal and state that the Council’s Strategic Housing Market Assessment, 2020 (SHMA (2020) suggests that the vast majority of people want to remain in their own home with support when needed and therefore there is low demand for residential care homes in the borough. This conclusion is based on the results of the 2018 Householder Survey.

The SHMA also sets out at table 7.22 that it is estimated that the number of residents living with dementia stood at 3,041 in 2017 and by 2035 would stand at 4,659 (an increase of 53%). Over the same period, it is estimated that residentials with early onset dementia will increase by 43 from 122 to 165.

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The SMHA (2020) also suggests that currently there are approx. 3,674 units of specialist older person accommodation including around 1,186 units of residential care (use class C2) dwellings. Analysis of demographic change would suggest a need for an additional 43 residential care (use class C2) units and 1,008 additional units of specialist older person residential (use class C3) units to 2036. The report concludes that there needs to be a broader housing offer for older people across the Borough and this includes the need for “*accommodation which is sensitive to the needs of those with dementia and early onset dementia.*”

Taking the above into account and balancing the loss of 4 single dwellings against the provision of a 70 bed care home for end of life and dementia, it is considered that the proposed use would be acceptable in principle. This is subject to detailed analysis regarding the proposals impact on Danson Park, Danson House and Danson Stables and no adverse impacts that would significantly and demonstrably outweigh the benefit.

#### **Impact on character and appearance of the area**

##### *Impact on the Historic Environment*

Paragraph 194 of the NPPF (2021) states that in determining planning applications, that LPA’s should require an applicant/agent to describe the significance of any heritage assets which would be affected, including that of any contribution made by their setting. Paragraph 194 follows on to state that the level of detail included should be proportionate to an asset’s importance and no more than is sufficient to understand the potential impact of a proposal upon significance. The framework suggests that as a minimum, the relevant historic environment record should be consulted.

Paragraph 199 of the NPPF states that when considering the impact of a proposed development upon a significance of a designated heritage asset, that great weight should be given to the asset’s conservation. The consideration of these impacts is irrespective of whether any potential harm amounts to either substantial harm, total loss or less than substantial harm to an asset’s significance.

The application site borders Danson Park and is directly adjacent to the main entrance of the park in the northeast corner at the junction of Danson Road/Crook Log/Park View Road. Danson Park is designated as a Grade II Registered Park and Garden. Within the park is also Danson House and Danson Stables which are Grade I and Grade II Listed Buildings respectively. Danson House is located some 364 metres to the southwest of the application site with Danson Stable some 334 metres to the southwest of the application site.

The Historic England Register entry states-

*Danson Park lies to the north of the A2 trunk road, East Rochester Way, between Welling to the north-west and Bexleyheath to the east. Suburban housing almost entirely encloses the site, with the A221, Danson Road providing the eastern boundary, Danson Mead and Parkview Road the northern*

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boundary, and Radnor Avenue and a footpath to the rear of houses in Merlin Road the west boundary.

The c 74ha site, enclosed within C20 walls and railings, is relatively flat, sloping moderately to the south with The Mansion located on a ridge of high ground that runs east/west through the site, this ridge effectively dividing the park into two halves. A valley which runs east/west across the southern part of the site was infilled by a lake behind an artificial dam. The height of the earth bank at the dam shows the significant depth of the valley. The land rises southwards in a ridge beyond the lake.

**ENTRANCES AND APPROACHES-** The main entrance to the site is from Danson Road to the east and follows the line of the drive remodelled c 1897 (OS). The new drive is shown crossing parkland before terminating at a turning circle on the north front of The Mansion. At the same time the access drives to the north front were realigned so that they focused around the turning circle rather than as previously, on the front steps. The main entrance drive today (1997) has mown grass borders and C20 trees and shrubs planted at intervals along its length; it is screened from the C18/C19 parkland by clipped hedges. It passes c 40m to the north of The Mansion, with the Old English Garden to the north and the turning circle to the south, and continues c 500m north-west past, to the north, the C19 stable block (listed grade II\*), before terminating at the Danson Lane Gate. On the east side of the Old English Garden a drive, now a tarmac footpath, passes through former parkland and connects the C20 Crook Log entrance with the main drive. This was the main entrance to the municipal park and is marked by ornate iron railings and gates.

**PRINCIPAL BUILDING-** The Mansion (listed grade I) stands on high ground with fine views out over falling ground to the south. It was built from c 1762 for John Boyd by Sir Robert Taylor and was originally called Danson Hill. The Mansion was completed by 1770 with some of the interiors having been designed by Sir William Chambers. The house is of Portland stone and has three storeys, a piano-nobile, and a half storey above a rusticated stone basement. The principal apartments are on the first floor. The walls are rendered and the roofs low and slated. The entrance is on the north side, up a grand flight of nineteen wide steps to a balcony as wide as the projected pedimented centre.

**GARDENS AND PLEASURE GROUNDS-** To the north of the entrance drive, opposite The Mansion, is the Old English Garden, which was laid out on former parkland and probably dates from the earliest stages of the municipal park in the 1920s. It has a pergola, paved paths, formal plant beds, and modern seats.

Some 50m north-east of The Mansion, a C20 perimeter path leads c 80m south from the entrance drive across an area of lawn to the east of the house. This area, open parkland on Richmond's plan of 1762/3, had been planted with regular rows of trees by 1805 (estate plan) and subsequently (by 1830) thinned (plan of the property of John Johnson). The area immediately around the house

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*is separated from the parkland by a hawthorn hedge to the east, and a beech hedge planted c 1970 to the south of the C18 ha-ha after it was filled in (mid-late C20). The line of the ha-ha, which would have divided the gardens from the parkland, is still recognisable as a distinctive step at the edge of the lawn. At about the same time (c 1860) as the beech hedge was planted, the southern perimeter path which ran between the ha-ha and The Mansion was re-routed to the south of the hedge. Today (1997) the hedge screens any view of the garden around The Mansion but three late C19 trees survive on the lawn to the east along with other C20 trees. Some 80m south east of The Mansion the C20 perimeter path turns west and continues for 160m to the south side of the beech hedge where it turns north and links up with the mid C19 west garden path which led around the western lawn to the Winter Garden. The Winter Garden, constructed by 1844, has been lost, as have the rose arches over the path. The west lawn was first shown as lawn with trees by c 1830 (Plan of the property of John Johnson) but the nature of the land before then is not clear. Mature trees including cedar of Lebanon (shown on OS 1860) and the shrubbery along the northern edge of the western garden are thought to survive from the mid C19, though contemporary paths through the shrubbery have been lost.*

*At its western end the southern perimeter path divides, one spur continuing north as the western perimeter path while the other runs south and leads down to the C20 formal garden and the water garden at the west end of the lake. The path is separated from the parkland by low hedges and shrubs, as well as some mature trees possibly surviving from the thin belt of trees which followed the contour down to the south-west of the house (sale plan, 1805). The C20 water garden, separated from the lake by a brick footbridge, is situated in the area where, in the C18, the Danson Brook fed into the lake. The two pieces of water that make up the water garden are recorded on the OS 1<sup>st</sup> edition map of 1865.*

**PARK-** *The land laid out as parkland lies to the south, west, and north of The Mansion. The land to the south slopes away from the house, levelling off before the lake and then rising slightly again to the south of the lake. The level areas of land are used for football in the winter months. Tree cover is sparse compared with the clumps and blocks of woodland shown on the C18 and C19 plans, and consists largely of a scatter of C20 individuals with more concentrated planting along the banks of the lake. Occasional mature trees, possibly C18/C19, survive, notably the 'Charter Oak' to the north of the lake. The C20 planting at the west end of the lake and around the water garden contrasts with the open aspect of the late C18 and early C19 (sale plan, 1805) and screens the view of the house from the south-west parkland. C20 plantings help to screen the site from the A2 trunk road which runs along the southern boundary. There is an ice well close to the eastern edge of the park.*

*The lake is the most striking feature on Richmond's plan (1762/3) which shows a system of three interlocking lakes connected and divided by curving plantations and a false island. The 1805 sale plan shows a simplified design similar to the Lower and Middle Lakes on the C18 plan and similar to the piece of water at Danson today (1997). The lower (eastern) section of the lake is*

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*known to have been under construction by 1770 when Sir William Chambers was commissioned to design a temple at its eastern end and a bridge at the western end. The lake was filled in during the Second World War as it was considered an obvious landmark for enemy aircraft but was subsequently re-excavated; it is currently used for boating. There is a cafe and boathouse (C20) on the north-east shore.*

*Little of the original parkland survives to the north and west of The Mansion. The stable block to the north of the house is thought to have been designed by George Dance the younger; this has been converted to a restaurant and is fronted by a public car park. Much of the C18/C19 park and woodland surrounding The Mansion has been lost to sport facilities which include tennis courts and playgrounds created since 1924. The views back to the house from the west are obscured by trees on the garden boundary.*

The Historic England listing is clear that the important features of Danson Park are

- I. Danson House (The Mansion),
- II. Danson Stables,
- III. the eastern (main) entrance,
- IV. the Old English Garden and
- V. the lake.

The application site is located beside the northeast corner of the Park, at the end of a row of large houses along Danson Road. All of the features identified within the listing are located either centrally within the site or further south. The listing does not make reference to the park entrance located in the northeast corner adjacent to the application site. The only reference to this corner of the park in the listing is that “*little of the original parkland survives*” and that park and woodland has been lost to “*sport facilities which include tennis courts.*”

Additionally, the park entrance located adjacent to the application site is not an original feature of the park as it was built in 1925.

As part of the Design and Access Statement key views have been provided, including CGI images of the development at the tree lined north east entrance point to the park and at the end of the entrance point where the access opens out into the park. The bulk, scale and mass of the development would increase over the current dwellings, however the tree and hedge lined nature of the access to the park and immediately behind the proposed development would help provide some screening and the set back from all boundaries fronting into the park aids to further reduce the visual impact of the development. It is not considered that it would result in an overbearing visual impact to the entrance or the wider park. The proposal would cause less than substantial harm and the justification for the proposal in both design terms and the benefit of a 70 bed care home for end of life and dementia care is considered clear and convincing and outweighs the less than substantial harm. Accordingly, the proposal would be in conformity with paragraph 200 of the NPPF 2021



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Due to the separation distance and screening it is considered that the proposed development would not affect the setting of either Danson House or Danson Stables. The proposal would not be visible from either. The proposal would also introduce additional trees within site, further obscuring the views to and from the application site and Danson House.

The eastern (main) entrance to the park is located some 400 metres to the south of the application site and is also on the same side of the road. A row of 19 (approx.) houses blocks the view of the main entrance and the application site and therefore the proposed development would not be visible from the park's entrance.

The Old English Garden is situated adjacent to Danson Stable and is approx. 275 metres away from the western boundary of the application site. The garden, particularly on the northern and eastern boundaries are obscured with hedges and trees and the tree lined path leading up to the northeast park entrance as well as scattered trees in that direction provide ample screening between the garden and the application site. Given this it is considered that the proposed development would not be overly visible from the Old English Garden.

The lake is located approx. 660 metres away to the south of the application site. Due to a large drop in land levels the application site cannot be seen from the lake.

The setting of both Danson House and Danson Stables would not be harmed by the proposal. Accordingly, the proposal would be in conformity with Paragraph 199 of the NPPF, 2021.

#### Design

Policy D3 and D4 of the London Plan (2021) states that the design of all new developments should enhance the quality of local places and that this should take into account a number of matters, including the physical context and local character.

Policy ENV39 of the UDP provides an overarching design policy and relates to the built environment; it seeks to protect and enhance the quality of the built environment and ensure all new developments are satisfactorily located and are of a high standard of design and layout. This includes compatibility with the character of the surrounding area. Policy H3 of the UDP is concerned with housing character and requires the Council to consider the actual or potential cumulative effects of a development.

Policy CS01 of the Bexley Core Strategy (2012) requires any proposal in the borough to achieve high quality design with Policy CS07(b) seeking to ensure that development is sympathetic to local character through high quality and well-designed developments

The proposed development would be seen from both the rear of neighbouring properties, from Danson Road, along the entrance into Danson Park and from limited views within the park itself.

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The proposed building would sit further forward than the existing dwellings on site. It would, retain a 10 metre separation distance to Danson Road and would not project beyond the front elevation of no. 10 Danson Road. It is considered that the placement of the proposed development within the site would retain a suitable setback from the public highway and would also respect the wider building line of the street.

The massing of the proposal has been designed to break up the visual mass along Danson Road. The frontage, while a single building, would be well articulated and reflect the residential character. This would be achieved through the use of typically domestic style roof forms (hipped and gabled) as well as the set back of parts of the front to provide depth, interest and reduce visual monotony.

The side wing which extends along the boundary adjoining the entrance to Danson Park has been carefully designed to minimise visual impact between hedges and trees that currently exists. The proposed wing would be set away from the two metre high hedge line by between 2 and 4.5 metres in order to reduce its prominence.

Additional trees and planting would be provided along this boundary to add screening. Whilst the wing would be clearly visible, given the lightweight materials proposed to be used it is considered that on balance, the visual impact would be acceptable.

The proposed building is a part single, part two, part three storey building of a high-quality contemporary design. The design makes use of varying heights, gables and hipped roofs and large fenestration. Along the northern boundary, the proposal has been designed as a three-storey building to Danson Road, reducing to two storeys along the Danson Park entrance.

The material palette proposed includes a mixture of red/brown bricks with dark and light mortar, zinc, metal framing (in order to allow for planted climbers), masonry fins and masonry window surrounds. The materials would complement the contemporary design of the development. Whilst details of these materials have been provided in the submitted Design and Access Statement, a materials condition is recommended to ensure that a high-quality finish would be delivered.

To the rear a sensory garden, a formal terrace, and a patio/small garden would be introduced. Below ground a sunken garden would be installed which would predominantly be hardstanding but would have some planting.

Additional shrubs and trees would be planted along the southern and western boundary of the site, along with a native hedge which would run across the western boundary of the site. This would be within Danson Park and would be planted and maintained by the Council. This would be acceptable, and a commuted sum would be paid to the Council secured via the S106 agreement.

Car parking would be provided to the frontage, along with refuse storage. A condition requiring details of a soft landscaping strategy has been recommended to ensure appropriate landscaping is provided to this area.

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### APPLICATION NO. 19/03072/FULM (cont'd)

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The northern, western and southern boundaries of the site would be enclosed by a 1.8 metre high contemporary timber fence. To the Danson Road frontage, a 0.4 metre high brick wall with vertical bar metal railing (0.7 metres) would be installed.

On balance, it is considered that the proposal would deliver a high quality contemporary design which would provide a meaningful contribution to the street scene without harming the existing the character and appearance of the locality.

Accordingly, it is considered that the proposed development conforms to the objectives of Policies D3 and D4 of the London Plan (2021), CS01 and CS07 of the Bexley Core Strategy (2012) and ENV39 and H3 of the Bexley UDP (2004).

#### **Impact on neighbouring amenity**

Policy ENV39 of the Bexley UDP (2004) states that development should not prejudice the environment of the occupiers of adjacent property in term of privacy, outlook and light. Policy D3 of the London Plan (2021) requires that developments deliver appropriate outlook and privacy to ensure a high-quality residential environment.

Paragraph 130(f) of the NPPF (2021), as set out above, is also relevant in this regard.

No.1 Danson Mead and 10 Danson Road would be most impacted upon by this development.

#### **1 Danson Mead**

No. 1 Danson Mead is located to the north of the application site on the opposite side of the park entrance. The rear elevation of the property is located against the side boundary to the park entrance, and it would face the side wing of the proposed development but would have a separation distance of approx. 24 metres.

The proposal would be two storeys in height along this boundary and it is not considered that it would be overbearing or introduce any unacceptable loss of privacy or overlooking.

#### **10 Danson Road**

No. 10 Danson Road is the unattached, two storey dwellinghouse situated to the south of the application site. The built form closest to no. 10 would be two storey in height and would not protect any further than front or rear building line of no. 10 Danson Road.

Given this and taking into account the orientation of the sun it is considered that the proposed development would not impinge on residential amenities such as daylight, sunlight or outlook. Nor would it be overbearing.

## **MAJOR APPLICATIONS**

### **APPLICATION NO. 19/03072/FULM (cont'd)**

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The proposed development would provide rear (west) facing bedroom windows which would overlook the rear garden of no. 10 Danson Road as well as south facing bedroom windows (from the portion of the building running along the northern boundary) which would have the potential to overlook the neighbouring garden.

All properties along Danson Road have rear facing windows at first floor level (and in some cases at main roof level) which overlook neighbouring properties and as such the overlooking of gardens is both common and mutual. The overlooking situation currently is that no. 8 Danson Road has three first floor windows that can look across the garden of no.10 Danson Road. Due to the layout and design of the proposed development the number of windows above ground floor level able to overlook the garden of no. 10 Danson Road would remain as three, albeit that one of these windows would be at third floor level. Given this it is considered that the overlooking situation would not be altered.

The south facing bedroom windows would be between situated between 19 and 24 metres away from the side boundary with no. 10 and while there may be an element of overlooking, on balance it is considered that the introduction of these windows would not result in a degree of overlooking significant enough to warrant refusal.

#### **Quality of Accommodation**

The proposed development is for a 70 bedroom care home which consists of 16 bedrooms at basement level, 20 bedrooms at ground floor level, 25 bedrooms at first floor level and 9 bedrooms at second floor level. Due to the type of development proposed there are no standards to be applied to this proposal with regard to floor areas, amenity space, outlook etc.

Notwithstanding this all bedrooms have a floor area of between 16 and 22sq.m plus an en-suite. The proposed room sizes are considered to be appropriate for the kind of care offered and would provide space for a bed and other necessary furniture.

All bedrooms in the lower ground level would have windows facing into the proposed sunken garden. This would provide daylight and sunlight. The proposed sunken garden has a width of between 5 and 11 metres with a length of 30 metres. A daylight analysis and shadow study has been undertaken which shows that all bedrooms would receive an acceptable level of sunlight in accordance with best practice guidelines.

Above ground floor level 12 bedrooms would be north facing along the boundary to Danson Park. Outlook and daylight would be acceptable as the windows would be generously proportioned and there would be a gap of approx. 24 metres to the nearest neighbour on Danson Mead (no.1).

All bedroom windows fronting the eastern elevation of the development would have a separation distance from the properties opposite (3-15 Danson Road) of between 34.7 and 46.5 metres. Given this distance outlook and daylight would be acceptable.

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All west facing bedrooms would overlook the park and would have uninterrupted views. Accordingly, no objection is raised on daylight or outlook grounds.

As part of this application the applicants have submitted a Noise Assessment for the development which concludes that the primary source of noise affecting the site would be from road traffic. The report demonstrates that acceptable internal noise levels for future residents can be achieved if enhanced acoustic glazing is provided to habitable rooms on sensitive facades (i.e. those facing Danson Road). Acoustically treated trickle vents (or equivalent wall vents) will also need to be incorporated into the glazing units in order that their acoustic performance is not compromised.

A condition has been recommended that requires the glazing and ventilator specifications detailed in the Noise assessment are fully implemented.

### **Highways and Refuse**

#### *Highways Safety*

The existing vehicular accesses to the existing houses would be removed and a new vehicular entrance would be provided at the southern end of the Danson Road frontage with the exit toward the northern end of the site frontage.

The proposed development would provide seventeen (17) car parking spaces for staff and visitors. One space would be provided for disabled parking, which is considered to be acceptable in the view of the Local Highways Authority. The London Plan (2021) does not set out a parking requirement for this use with discretion for the LPA to define what would be acceptable. Given the PTAL of 3-4 (Moderate-Good) and the proposed use, movements of staff and visitors, the car parking provision proposed would be considered acceptable.

20% of the proposed spaces would be fitted with active charging points with the remainder having a passive provision. This would be in line with the London Plan (2021).

Twelve (12) bicycle parking spaces would be provided within the rear garden of the development. Access to these would be via a side gate. Four cycle parking spaces would be provided to the front. The London Plan (2021) would require 1 space per full time member of staff (long stay) plus 1 space per 20 bedrooms (short stay), this means that sixteen (16) cycle parking spaces would be needed. Given that sixteen cycle parking spaces are being provided, the provision is acceptable..

The Transport Statement submitted in support of the application includes an assessment of the likely traffic generation and car parking demand of the proposed care home compared with the existing 4 dwellings using the industry standard TRICS database. The analysis suggests the proposals would generate between 10 and 8 additional vehicular trips during the am and pm highway network peak periods respectively and the proposed car parking demand would amount to 11 vehicles.

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The applicant has stated that they operate several nursing, residential and care homes across south east England and East Anglia and the applicant has carried out a parking survey of the existing facility at Heathfield Court, Colyers Lane, Erith which has 66 bedrooms and 18 car parking spaces.

The Erith site has a lower PTAL of 1b (Very Poor) while the application site has a PTAL of 4 (Good). Opportunities to use public transport for the application site are better.

The proposal is a little larger than the surveyed site (70 bedrooms) with 17 car parking spaces. However, given the additional benefit of the higher PTAL level, it is likely that car use will be naturally offset. The applicant is also willing to introduce a Travel Plan to promote sustainable travel to and from the site.

The busiest period of accumulation recorded in the survey was around 12.30pm when 12 parking spaces were occupied and at no times did the car parking at full capacity.

The Highway Authority therefore considers the conclusions of the Transport Statement in terms of traffic generation and car parking accumulation to be reasonable.

Further information and mitigation measures were provided to address concerns by the Local Highways Authority regarding the position of the proposed exit located close to the traffic signal-controlled junction at Danson Road and the A207. The main concern would be vehicles turning right out of the site, crossing traffic queuing for the signal-controlled junction. This could lead to highway safety hazards.

Additional information and mitigation measures were provided by the applicant and reviewed by the Local Highways Authority. It is proposed to implement a left turn only exit and this would be considered acceptable. A condition is recommended to secure the implementation of the left hand turn only measures suggested.

#### Refuse

Refuse and medical waste would be collected by a private waste collection company. The submitted refuse collection strategy shows that a small tipper vehicle would be used which could navigate the site, subject to one parking bay being suspended at the entrance to the site.

The parking bay would only have to be suspended for a limited period of time and once the refuse vehicle has entered the site the parking bay can be used again. With regard to collection, the applicant has confirmed that collection can be organised around the day to day running of the care home in order to ensure that collections occur on days/periods when the car park is not likely to be full and when the suspension of this parking par would have a very limited impact on the overall parking provision.

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#### **Trees**

The applicants have submitted an arboricultural report which was produced prior to the design of the development being finalised. Only limited details on protection measures were therefore provided. Five category U trees (T1, T2, T11, T13 and T16) would be removed.

The proposed bin store would be located underneath a tree which is proposed to be retained as part of this development. The submitted bin store plan shows that the proposed refuse store would sit on a structure in order to protect the root protection area of the tree. This is considered to be acceptable.

Given that the arboricultural report was produced prior to the design of the development being finalised a condition is recommended requiring that a new report be provided detailing how trees are to be adequately protected.

#### **Archaeology**

The application site is situated in the Bexleyheath & Crayford Area of Archaeological Search. As part of the application a Desk Based Assessment has been undertaken. A condition is recommended requiring a written scheme of investigation is submitted.

Subject to this condition the development is considered to accord with Policy CS19 of the Bexley Core Strategy (2012).

#### **Environmental Considerations**

Policies CS01, CS08 and CS09 of the Core Strategy (2012) seek to ensure that development proposals maximise opportunities to improve the health of the environment (including drainage, air quality, biodiversity and contamination) and promote sustainable development and mitigate the effects of climate change.

Paragraph 174 of the NPPF (2021) seeks to ensure that developments contribute to and enhance the natural and local environment.

New development is expected to demonstrate how it has incorporated sustainable principles into the development including: construction techniques, renewable energy, green infrastructure and carbon reduction technologies.

Policy CS08 of the Core Strategy sets out that new development will be expected to comply with the London Plan regarding such matters as sustainable development.

#### **Energy**

In accordance with Policy SI2 of the London Plan (2021) all major developments are required to be net zero in carbon emissions. A minimum on-site reduction of 35% beyond Building Regulations must be met, and the remaining shortfall to zero-carbon should be offset through a cash-in-lieu contribution to the borough's carbon offset fund.

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As part of this application the applicants have submitted an Energy Statement and an Overheating Assessment which shows that the proposed development has a zero-carbon shortfall of 583.9 tonnes over the next 30 years. This means that an offset payment of **£55,470.50** is required. This can be secured via a S106 agreement.

The London Plan (2021) now also contains an additional requirement in the energy hierarchy, '4) Be Seen: monitor, verify and report on energy performance'.

Paragraph 9.2.10 states:

“Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC), and reporting to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London.”.

The applicants energy statement does mention monitoring equipment being installed, but relevant data collected should be reported to the Mayor. An Informative is recommended to remind the applicant of this.

#### Drainage

The application site is located in Flood Zone 1 and therefore would be at low risk of flooding. However, given the proposed basement, a Flood Risk/Foul and Surface Water Management Statement and a drainage strategy have been submitted. The flood risk assessment is considered to be acceptable. However, further details for the drainage strategy would be required. The submitted report shows that maximum discharge rate would not achieve greenfield runoff rates. According to the submitted report the calculated greenfield runoff rates could be achieved on site with a suitable SUDS design.

A condition is recommended requiring further details to ensure conformity with Policy SI13 of the London Plan (2021).

#### Impact on Biodiversity and Ecological Impact

Policy CS17 of the Core Strategy sets out that the Council will seek to protect and enhance biodiversity. Policy CS18 further seeks biodiversity enhancements and improved access to nature, particularly in areas of deficiency, through new development.

As part of this application the applicants have submitted a Preliminary Ecological Appraisal. The submitted report is considered to be acceptable, and a condition is recommended to secure that the development is undertaken in accordance with the details submitted.



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#### *Air Quality*

The applicants have submitted a detailed assessment of air quality impacts associated with this proposal. The report was carried out in accordance with accepted methodologies and assesses the impacts associated with both the construction and operation of the development in terms of nitrogen dioxide and particulates. It also includes an air quality neutral assessment which is a requirement for proposed major developments in the London Plan (Policy S11).

The submitted assessment has been reviewed by the Councils Environmental Health Officers and is considered to be acceptable. Two conditions are recommended to require the submission of a demolition and construction management plan and evidence to show that the development has been registered on the Non-Road Mobile Machinery (NRMM) register.

#### **Fire Safety**

Policy D12 of the London Plan (2021) requires that all major developments are accompanied with a Fire Statement which is an independent fire strategy that has been produced by a third party, suitably qualified assessor.

The applicants have submitted a fire statement which has been produced by Fire Training International, a company who specialise in fire safety for care homes. The submitted fire statement addresses all points set out within Policy D12 of the London Plan (2021) and no objection is raised on fire safety grounds.

#### **Secured by Design**

By its very nature as a care home for those with dementia, security will be of paramount to the applicant and, therefore, will be an important feature throughout the development. Notwithstanding this it is important to make sure that the development is secure from the outside and to prevent crime from occurring. A Secured by Design condition is recommended.

#### **NHS**

It is acknowledged that the nature of this development would result in development an increased pressures on the local NHS services. In order to mitigate pressures the London Healthy Urban Development Unit has calculated that a financial contribution of £130,235 is required in order to alleviate any pressure caused. This would be secured through a S106 agreement.

## **EQUALITIES CONSIDERATIONS**

The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

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In summary, the Council must, in the exercise of its function, ***have due regard*** to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and persons who do not share it.

“To have due regard” requires the decision maker “to ensure that there has been a proper and conscientious focus on the statutory criteria ... the decision maker must be clear precisely what the equality implications are when he puts them in the balance, and he must recognise the desirability of achieving them, but ultimately it is for him to decide what weight they should be given in the light of all relevant factors”: Elias LJ in *R (Hurley) v Secretary of State for Business, Innovation and Skills* [2012] EWHC 201 (Admin). The duty must be “exercised in substance, with rigour, and with an open mind”. It is not a question of “ticking boxes”: McCombe LJ in *Bracking v Secretary of State for Work and Pensions* [2013] EWCA Civ 1345.

However, to be clear, the “to have due regard” duty does not establish an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

The planning issues above raise equalities implications which relate to protected characteristic of age and disability. Officers have due regard to these protected characteristic vis a vis the public sector equality duty in assessing this application.

## HUMAN RIGHTS IMPLICATIONS

In determining this application the Council is required to have regard to the provisions of the Human Rights Act 1998.

Section 6 of the Human Rights Act 1998 prohibits authorities (including the Council as local planning authority) from acting in a way which is incompatible with the European Convention on Human Rights. “Convention” here means the European Convention on Human Rights, certain parts of which were incorporated into English law under the Human Rights Act 1998. Various Convention rights are likely to be relevant including:

- Article 8: Respect for your private and family life, home and correspondence
- Protocol 1, Article 1: Right to peaceful enjoyment of your property

The decision maker need to satisfy themselves that the impacts are acceptable and that any potential interference with the above Convention Rights will be legitimate and justified.

Officers have taken into account both public and private interests when making this recommendation.

## **MAJOR APPLICATIONS**

### **APPLICATION NO. 19/03072/FULM (cont'd)**

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This application has the legitimate aim of providing a nursing home for high dependency residents with Dementia and end of life care needs

Members must also consider whether there is any interference any of the Convention Rights, and if so whether such interface is proportionate and justified taking into account the public vs. private interests. Members must therefore, carefully consider the balance to be struck between individual rights and the wider public interest.

#### **Response to representations**

A number of objections have raised concerns with regard to property values as a result of this proposal and covenants relating to the Bean Estate. These are not a material planning consideration. Objections have also raised the issue of the development not providing enough rooms for local residents. However, in the submitted proposal the applicant has stated in their "*Danson Road Nursing Home Proposal*" document that should the application be successful that the applicant will only market to residents living within the borough. But this does not preclude them from accepting people from outside the borough.

Objections have been raised with regard to the Council preventing rear extensions along Danson Road. Each planning application is assessed on its own merits and determined in line with the development plan and other material considerations.

It is no considered the development would set a precedent for flatted development along Danson Road. Any scheme for flats would be assessed against the relevant policies in the development plan and other material considerations.

With regard to the public surveys undertaken by the applicant, this is not a requirement of the planning process.

#### **Conclusion**

Based on the above analysis, it is considered that the proposed redevelopment to provide a 70 care home would not cause harm sufficient to Danson Park or the listed buildings within to warrant refusal. Additionally, there is not an adverse impact resulting from the scheme that would significantly outweigh the benefits of the scheme in providing 70 beds for dementia and end of life care.

Therefore, the scheme is considered acceptable, subject to conditions and the entering into of a S106 agreement.

#### **RECOMMENDATION**

That the Committee resolve to GRANT planning permission subject to:

- A) The prior completion of a legal agreement to secure the following planning obligations:

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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- (i) A 20 year commuted sum of £6,464.27 for the maintenance of the proposed hedge to be planted in Danson Park.
- (ii) A Carbon Offset payment of £55,470.50
- (iii) A payment of £130,235 towards NHS health contributions

That the Head of Planning and Regulatory Services is delegated authority to negotiate the legal agreement summarised above. If by 3 months from the date of the Planning Committee resolution the legal agreement has not been completed, the Head of Planning and Regulatory Services may exercise his delegated authority to refuse planning permission (where he considers it expedient to do so).

B) That the Head of Planning and Regulatory Services is delegated Authority (subject to A above) to issue the planning permission and impose conditions (and informatives) to secure the following matters:

#### Conditions:

1. The development hereby permitted shall be begun within 3 years from the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004).

2. The development hereby permitted shall only be carried out in accordance with the following approved plans and documents:

#### Plans:

3000 Rev P10, 3001 Rev P8, 3002 Rev P8, 3003 Rev P7, 3004 Rev P3, 3601 Rev P5, 1003 Rev P7, 12395/P09, 3602 Rev P1, 190322-005, 190320-004 Rev B, 12395\_TG\_P\_001 (Illustrative Landscape Plan), 12395\_TG\_P\_100 (Landscape General Arrangement Plan), 12395\_TG\_P\_300.

#### Documents:

Right turn mitigation strategy (undertaken by Ardent Consulting Engineers)  
Fire Statement (undertaken by Fire Training International LTD)  
Air Quality Assessment (undertaken by Dustscan AQ) dated October 2019.  
Noise Assessment (undertaken by Ardent Consulting Engineers ref: 190320-03) dated September 2019

Reason: For the avoidance of doubt and in the interests of good planning.

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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3. No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
  - A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
  - B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Reason: Heritage assets of archaeological interest may survive on the site. The planning authority and Historic England (Archaeology) wishes to secure the provision of appropriate archaeological investigation, including the publication of results.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme.

4. A. The development may not commence until a Demolition and Construction Management and Logistics Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include details of:
  - a) The location of notice boards on the site to include details of the site manager, including contact details (phone, email, postal address) and 'out of hours' contact details;
  - b) A strategy for the parking of vehicles of site operatives and visitors;
  - c) A strategy for the loading and unloading of plant and materials;
  - d) A strategy for the storage of plant and materials used in constructing the development;
  - e) Details of days/hours of work and deliveries of construction materials;
  - f) Measures to be adopted to maintain the site in a tidy condition in terms of disposal/storage of rubbish, storage and unloading of building materials and similar construction activities;
  - g) Measures to be adopted to ensure that pedestrian access past the site on the public footpaths is safe and not (unduly) obstructed during construction works;
  - h) Construction site lighting;
  - i) Reasonable measures to be adopted, such as a restriction on the size of construction vehicles and machinery accessing the site, to minimise any potential damage occurring to adjacent streets throughout the construction period;

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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- j) Location of vehicle and construction machinery access during the period of site works including identification of any works necessary to the public highway necessary to provide a means of access during the construction and/or operation of the development;
- k) Numbers and timing of truck movements throughout the day and the proposed routes broken down by size of trucks;
- l) Vehicle holding areas;
- m) Construction traffic routes;
- n) Means of minimising noise and vibration (including any piling), and compliance with BS 5228;
- o) Procedures including wheel washing for controlling sediment runoff, dust and the removal of soil, debris and demolition and construction materials from public roads or places;
- p) A Dust Management Plan, including details of mitigation measures for dust and emissions during demolition and construction along with a monitoring regime for the same in accordance with Air Quality: Best Practice Guidance - The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance (published by the Greater London Authority, July 2014);
- q) A Demolition and Construction Site Waste Management Plan which includes details of managing demolition and construction waste having regard to the site waste hierarchy (prevention, reuse, recycling, recovery, safe disposal).
- r) Location of workers' conveniences (e.g. toilets, showers); and,
- s) Details of the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate.

B. The development hereby permitted shall only be carried out in accordance with the approved details.

Reason: In order to ensure that the construction of the development is undertaken in a manner which minimises its' effect on the local environment.

This pre-commencement condition is required as it relates to both demolition and construction works.

5. A. Prior to the commencement of development, the development hereby approved shall be registered on the Non-Road Mobile Machinery (NRMM) register: <https://nrmm.london/user-nrmm/register>.

Throughout the duration of construction all NRMM to be used on the development site shall be submitted to the NRMM register.

B. The development shall only be carried out in accordance with the submitted details to the NNMM register.

Reason: In the interests of maintaining local air quality.

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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This pre-commencement condition is necessary as the Non-Road Mobile Machinery is used in the demolition/construction process.

6. A. The development shall not commence until an Arboricultural Method Statement in accordance with BS5837:2012, including tree protection measures, has been submitted to and approved in writing by the Local Planning Authority in relation to the development.

The plans and particulars submitted in accordance with this condition shall include:-

(I) a plan showing the location of, and allocating a reference number to, each existing tree on the site which has a stem with a diameter, measured over the bark at a point 1.5 metres above ground level, exceeding 75 mm, showing which trees are to be retained/removed and the crown spread of each retained tree;

(II) details of the species, diameter (measured in accordance with paragraph (a) above), and the approximate height, and an assessment of the general state of health and stability, of each retained tree and of each tree which is on land adjacent to the site and to which paragraphs (c) and (d) below apply;

(III) details of any proposed topping or lopping of any retained tree, or of any tree on land adjacent to the site;

(IV) details of any proposed alterations in existing ground levels, and of the position of any proposed excavation works in relation to any nearby trees

(V) details of the for the protection of any retained tree from damage before or during the course of development. In the event that any part of the protective fencing is damaged or removed during the course of development it shall be promptly repaired or replaced to the satisfaction of the Local Planning Authority. No protective fencing shall be removed until all equipment and machinery and surplus materials have been removed from the site

(VI) details of any measures used to avoid damaged caused to tree roots by any hardstanding or structure erected within the root protection zone of any tree on site.

- B) The development shall be undertaken in accordance with the approved Statement and existing trees identified to be retained shall be protected in accordance with the measures outlined in the approved Statement.

- C) In the event that any part of the protective fencing is damaged or removed during the course of development it shall be repaired or replaced within 48

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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hours or as soon as reasonably possible. No protective fencing shall be removed until all equipment, machinery and surplus materials have been removed from the site.

Reason: To prevent any unnecessary damage to the trees during the construction process.

This pre-commencement condition is necessary as these details relate to the protection of trees during construction works.

7. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

8. A. No material operations within the meaning of section 56(4) of the Town and Country Planning Act, 1990 (as amended) may take place, save for demolition until a scheme for a Sustainable Drainage System in accordance with the Bexley Sustainable Drainage Design and Evaluation Guide (2018) shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall include details of:

- i. How reduction in surface water runoff to the greenfield runoff rate shall be achieved;
- ii. Calculations to demonstrate that the proposed system is fit for purpose, including correctly sized attenuation and surface water discharge rates;
- iii. Installation of petrol/oil interceptors as necessary;
- iv. Distribution of foul water flows into the surrounding sewer network as necessary;
- v. Installation of rainfall attenuation units for capturing and reusing water;
- vi. Information about the design storm period and intensity, the method employed to delay and control surface water discharged from the site and measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- vii. Include a timetable for its implementation; and
- viii. Provide a management and maintenance plan for the lifetime of the development.

- B. The Scheme must demonstrate how the drainage hierarchy set out in London Plan Policy 5.13 has been followed:

- 1<sup>st</sup> Store rain water for later use;



## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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- 2<sup>nd</sup> Use infiltration techniques, such as porous surfaces in non-clay areas;
- 3<sup>rd</sup> Attenuate rainwater in ponds or open water features for gradual release to a watercourse;
- 4<sup>th</sup> Attenuate rainwater by storing in tanks or sealed water feature for gradual release to a watercourse;
- 5<sup>th</sup> Discharge rainwater direct to watercourse;
- 6<sup>th</sup> Discharge rainwater to a surface water drain; and
- 7<sup>th</sup> Discharge to the combined sewer

C. The development shall only be carried out in accordance with the approved details.

Reason: To ensure that the site is sustainably drained. These details are required at an early stage to ensure the drainage measures are factored into the build process.

9. A. Prior to the commencement of above ground works a detailed schedule and specification/samples of the materials and finishes to be used shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:

- Brickwork (including bonding and mortar);
- Cladding;
- Windows and doors (including reveals and frames);
- Soffits;
- Balconies and privacy screens;
- Canopies;
- External guttering;
- Roofing materials;
- Boundary treatments

B. The development shall be carried out and retained in accordance with the approved details.

Reason: To ensure the satisfactory external appearance of the development.

10. A. Prior to the commencement of above ground works details of electric vehicle charging point provision for conveniently located charging points shall be submitted to and approved in writing by the Local Planning Authority.

B. The agreed details shall be implemented prior to occupation of the development and shall be permanently maintained and available for use thereafter.

Reason: To accord with the London Plan and in the interests of sustainability. These details are required prior to commencement as the infrastructure will need to be designed and planned with cables and ducting being laid during

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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construction and possibly the electricity supply and/or circuitry being upgraded to suit, which would be difficult to achieve post construction.

11. The proposed access and egress to the site onto the existing highway shall be constructed in accordance with design and specification first submitted to, and approved in writing by, the Local Planning Authority before the development is first brought into use.

**Reason:** - To ensure a satisfactory standard of development and in the interests of highway safety.

12. A. Details of arrangements for cycle storage (including means of enclosure for the area concerned where necessary) for 12 long stay and 4 short stay spaces shall be submitted to, and approved in writing by, the Local Planning Authority before any part of the development hereby permitted is first brought into use.

B. the approved arrangements shall be completed to the satisfaction of the Authority before any part of the development is first occupied, and permanently maintained thereafter to the Authority's satisfaction.

**Reason:** To ensure a satisfactory standard of development and to encourage travel to and from the site by sustainable means

13. A. Before any part of the development is first brought into use, a Travel Plan incorporating measures to reduce car traffic by encouraging travel to and from the site by other means of transport shall be submitted to, and approved in writing by, the Local Planning Authority. The plan shall include a methodology for its implementation and monitoring. The development shall not be occupied or operated other than in complete accordance with the agreed Travel Plan.

B. No part of the development shall be occupied prior to implementation of the approved travel plan (or implementation of those parts identified in the approved travel plan as capable of being implemented prior to occupation). Those parts of the approved travel plan that are identified as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented for the lifetime of the development.

**Reason:** In the interests of minimising the environmental impact of the scheme and to promote sustainable travel to and from the site.

14. Notwithstanding condition 2, prior to above ground works, a scheme of soft and hard landscaping, which shall include details of vehicular car parking, public footpath and means of access to the communal amenity areas for occupants of the development (including people who require level access and wheelchair users) planting plans and specifications, and a management plan

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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for future maintenance of the areas concerned shall be submitted to and approved in writing by the Local Planning Authority.

- The hard landscaping works, shall be carried out prior to occupation in accordance with the approved details.
- The soft landscaping works shall be carried out prior to occupation or in the first seeding season following practical completion (whichever is earlier) in accordance with the approved details.
- The management plan shall be implemented in accordance with the approved details.

Any trees or plants which, within a period of 5 years from the carrying out of the soft landscaping works, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species to those originally planted.

Reason: In the interests of the visual and residential amenities of the area.

15. Prior to occupation of the development hereby approved, details of bird nesting boxes and bat boxes to be incorporated into the development shall be submitted to and approved in writing by the Local Planning Authority.

The details shall include the exact location, number specification and design of the habitats. The boxes shall be installed within the development in accordance with the approved details, prior to the first occupation of the building to which they form part or the first use of the space in which they are contained, and shall be maintained as such thereafter.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance Policies CS09 and CS18 of the Bexley Core Strategy.

16. The access to the site shall be provided with those parts of 2.4m x 2.4m pedestrian visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.

Reason: In the interests of highway safety

- 17.A. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing. Before development restarts at that part of the site a Risk Assessment and Remediation Scheme shall be produced by (a) suitably

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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qualified person(s) and submitted for written approval to the Local Planning Authority.

B. The development may only restart on that part of the site in accordance with the approved Remediation Scheme.

C. Prior to first occupation

- i. A Verification Report that demonstrates the effectiveness of the works carried out pursuant to approved details in relation to Part A and B of this condition shall be submitted for written approval to the Local Planning Authority.
- ii. No occupation or use of the development shall take place until the Report has been approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land, together with those to controlled waters, property and ecological systems, are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors.

18. The premises shall be used as a residential care home and for no other purpose (including any other purpose in Class C2 of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

Reason: In order to ensure that the use is appropriate in this location, as other uses may generate additional impacts.

### Informatives

1. The applicant should be aware that this development is liable for both the Mayoral Community Infrastructure Levy and the London Borough of Bexley's Community Infrastructure Levy (CIL).

Before the implementation of this planning permission someone will need to assume Liability for any CIL Charge for the development. Therefore the Council's CIL Administration Officer should be contacted at the earliest opportunity, to discuss what is required and to ensure that the correct process is followed. Contact in the first instance can be made by email to [DevelopmentControl@bexley.gov.uk](mailto:DevelopmentControl@bexley.gov.uk) or by telephone to 020 3045 5912.

Please note: - any failure to follow the correct process can lead to surcharges being applied to any CIL Charge due and subsequent legal proceedings can be taken including the issuing of a CIL Stop Notice.

2. The implementation of this planning permission will require the assignment of a postal number(s). The Council, as the Local Street Naming and Numbering

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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Authority, are responsible for approving new road names, assigning postal numbers and entering the information on the National Land & Property Gazetteer, a national database of address information. An application must be submitted to the Council at the earliest opportunity, to ensure that any new number(s) are assigned before the development is occupied. A fee will be required for this service (see Bexley Council's web site for details or telephone 0203 045 5884).

3. The applicant is advised to contact the Council's Street Scene Services department in respect of the construction of the proposed vehicular access to the site.
4. An undertaking should be given that access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire-fighting purposes will be provided.
5. If you are planning on using mains water for construction purposes, it is important you let Thames Water know before you start using it, to avoid potential fines for improper usage.
6. There are water mains crossing or close to your development. Thames Water do not permit the building over or construction within 3m of water mains. If you are planning significant works near Thames Water mains (within 3m) Thames Water need to check that your development does not reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services they provide in any other way. The applicant is advised to read the Thames Water guide 'working near or diverting our pipes'.
7. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read the Thames water guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you are considering working above or near Thames Water pipes or other structures.
8. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx.. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
9. Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC), and reporting to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London.

## MAJOR APPLICATIONS

### APPLICATION NO. 19/03072/FULM (cont'd)

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10. All NRMM should meet, as a minimum, the Stage IIIA emission criteria of Directive 97/68/EC and its subsequent amendments unless it can be demonstrated that Stage IIIA equipment is not available.

All NRMM should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment.

That the Head of Planning and Regulatory Services is delegated authority to make changes to the wording of the Planning Committee's decision (such as to delete, vary or add conditions, informatives and/or planning obligations) and to accept changes to the development prior to the decision being actioned, always provided that the Head of Planning and Regulatory Services is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

----- END -----

## **APPENDIX 3**



## Appeal Decision

Inquiry held on 25 - 28 January 2022

Site visit made on 31 January 2022

**by Andrew Dawe BSc (Hons), MSc, MPhil, MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 12<sup>th</sup> April 2022

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**Appeal Ref: APP/D3830/W/21/3281350**

**Land East of Turners Hill Road, Fellbridge, Crawley, RH10 4HH**

**(grid ref. 5333519, 139402)**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Mr Grant Stevenson of Rainier Developments (Cophorne) Ltd against the decision of Mid Sussex District Council.
  - The application Ref DM/20/3081, dated 18 August 2020, was refused by notice dated 7 July 2021.
  - The development proposed is the development of a 64 bed care home (Class C2) and associated infrastructure, including a new access road, car park and landscaped gardens.
- 

### Decision

1. The appeal is allowed and planning permission is granted for the development of a 64 bed care home (Class C2) and associated infrastructure, including a new access road, car park and landscaped gardens at Land East of Turners Hill Road, Fellbridge, Crawley, RH10 4HH (grid ref. 5333519, 139402) in accordance with the terms of the application, Ref DM/20/3081, dated 18 August 2020, subject to the conditions set out in the attached Annex.

### Application for costs

2. An application for costs was made by Mr Grant Stevenson of Rainier Developments (Cophorne) Ltd against Mid Sussex District Council. This application is the subject of a separate Decision.

### Preliminary Matters

3. For clarity, the date of the application in the third bullet of the above header and in the decision is taken from the original planning application form, notwithstanding that it is stated as 19 August 2020 on the Appeal form.
4. The emerging Mid Sussex District Council Site Allocations Development Plan Document (the SADPD) remains to be adopted. However, it is at an advanced stage whereby consultation on the Inspector's Main Modifications (MMs) has recently taken place. Those MMs include under MM3 a proposed additional policy to those originally set out, policy SA39, relating to Specialist Accommodation for Older People and Care Homes. Given the advanced stage towards adoption of the SADPD, and the relevance of that emerging policy SA39 to this appeal, that policy attracts a significant degree of weight for the purposes of this appeal.



## **Main Issues**

5. The main issues are:

- i) the effect of the proposed development on the landscape character and appearance of the site and surrounding area;
- ii) the effect of the proposed development in terms of the Council's spatial strategy with particular regard to sustainable travel, having regard to local and national policy;
- iii) the nature and scale of the need for housing of the type proposed to meet the needs of older people.

## **Reasons**

### *Landscape character and appearance*

6. The site is located outside of any defined built-up area boundaries, is not allocated in the development plan for the proposed use and is not contiguous with an existing built-up area of any settlement. As such it would not be supported by policy DP6 of the MSDP relating to settlement hierarchy, and in relation to this main issue is within the countryside. Furthermore, paragraph 174 of the National Planning Policy Framework (the Framework), states that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things, recognising the intrinsic character and beauty of the countryside.
7. Policy DP12 of the Mid Sussex District Plan (the MSDP) sets out the requirement for protection and enhancement of the countryside. It states that the countryside will be protected in recognition of its intrinsic character and beauty. It goes on to state that development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and it is necessary for the purposes of agriculture; or it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.
8. Policy DP26 of the MSDP relates to character and design and requires, amongst other things, that all development and surrounding spaces will be well designed and reflect the distinctive character of the towns and villages while being sensitive to the countryside. Furthermore, policy CDNP05 of the Crawley Down Neighbourhood Plan (the CDNP) states the planning permission will be granted for residential development subject to, amongst other things, the scale, height and form fitting unobtrusively with the surrounding buildings and the character of the area or street scene.
9. The Appellant conducted a Landscape and Visual Appraisal (LVA), which has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment third edition 2013 which is not disputed. I have taken account of the LVA in respect of this issue along with all other relevant evidence.
10. In respect of a Landscape Character Assessment for Mid Sussex 2005, the site is located within Landscape Character Area (LCA) 6 relating to High Weald

which occupies a large proportion of the District; and in respect of the Mid Sussex Landscape Capacity Study 2007, it is within LCA 01 – East Crawley – Copthorne Settled Woodland Matrix. The LVA finds that the site and surrounding area are broadly consistent with the descriptive analysis for both of these LCAs and I have no substantive basis to consider differently.

11. The site comprises mixed woodland comprising a variety of mature trees, mainly deciduous but also with some evergreen. The development in the close vicinity of the site, in terms of that fronting Turners Hill Road is limited to a small number of properties to the north, south and opposite the site, sporadically positioned. The proposed development would lessen the degree to which that partially sporadic nature of development in that vicinity of the site would remain. However, the sporadic nature and linear aspect of development along Turners Hill Road is not the sole characteristic of that immediate vicinity. In this respect there is also a more formal small housing estate opposite and to the south-west of the site and a small number of properties along Chapel Lane extending away from Turners Hill Road to the north and north-east of the site.
12. Notwithstanding the wooded, verdant and undeveloped nature of the site, it is therefore set within that context of existing built form in close proximity to the junction with the A264 to the south, known as the Dukes Head roundabout. It is really only beyond Mill Lane opposite the north-west corner of the site and the dwelling immediately to the north of the site on the opposite side of Chapel Lane, that the countryside character on both sides of the road becomes more generally open. This includes fields, woodland and a small number of properties spread out on the western side of the road, and the spacious grounds of the Effingham Park hotel on the eastern side.
13. The proposed development would therefore not encroach into that more widely open countryside environment. Furthermore, and in any case, it would still retain a significant verdant character with the retention of most of the existing mature roadside trees on the site. It would be a noticeably and distinctly larger building than those in that immediate vicinity and it would occupy a large area of the plot. However, other than in respect of the housing estate opposite, there is no uniformity in the scale of those existing buildings or their footprint to plot ratio. Furthermore, it would not be an unusual feature in the context of the slightly wider area where there are existing large buildings such as relating to the hotel in Effingham Park to the north or business units to the east alongside the A264.
14. In visual terms, the site has a distinctly wooded appearance which on the approaches along Turners Hill Road is dominated by the mature frontage trees. However, I saw that those trees further within the site's boundaries can also be seen to varying degrees, certainly in the winter, in the closer proximity either via the Rowan site or viewed directly through the frontage trees when in front of and very close to the site. That is a similar scenario on the approach to the site along Chapel Lane.
15. The proposed care home would therefore be visible to varying degrees from local public vantage points. However, it would be set back and softened by the intervening vegetation which would likely remain the dominant feature of the site, despite the gap that would be created by the site access and the loss of trees further within the site, particularly as seen on the approaches to the site along Turners Hill Road. The degree of prominence of the proposed building as

seen from outside of the site would also be reduced to some extent through its design and position on the site and some likely additional softening by proposed new trees, hedge and shrub planting. In this respect, as well as the varying degrees of set back from the site boundaries, the massing of the proposed building would be broken up with a single storey element separating the two main sections, and the building slab level would be generally slightly lower than Turners Hill Road.

16. Although there are those existing dwellings to the east and north of the site, they are not clearly visible from the road, such that beyond Rowan on that eastern side of Turners Hill Road, there is a distinctly verdant character to the streetscene. That would therefore be eroded to a degree but for the above reasons, not significantly. Furthermore, the proposed development would be seen in the context of an existing prominent dwelling positioned close to the road opposite the site on Turners Hill Road, as well as the immediately to the south. As such, the presence of the proposed additional built form within that existing context would not be seen as an isolated alien visual feature.
17. The proposed development of the currently undeveloped wooded site would inevitably change the character and appearance of the site and to some extent the immediate surroundings. As such, to a degree, it would detract from the intrinsic character and beauty of the countryside. However, for the above reasons, the extent of that harm, including localised visual effects, would be limited.
18. For the above reasons, I conclude on this issue that the proposed development, as well as not being supported by policy DP6 of the MSDP, would cause some harm to the landscape character and appearance of the site and surrounding area. As such, regardless of the disputed position as to whether or not the proposed development is supported by a specific policy reference, it would conflict with policies DP12 and DP26 of the MSDP and policy CDNP05 of the CDNP. However, also for the above reasons, the extent of that harm would be limited, and I will consider this further in the planning balance.

#### *Sustainable travel*

19. Policy DP21 of the MSDP states that decisions on development proposals will take account of whether, amongst other things, the scheme is sustainably located to minimise the need for travel; and appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, including suitable facilities for secure and safe cycle parking, have been fully explored and taken up. It goes on to state that where practical and viable, developments should be located and designed to incorporate facilities for charging plug-in and other ultra-low emission vehicles.
20. Policy CDNP10 of the CDNP states that development that does not conflict with other policies will be permitted provided that it promotes sustainable transport within the Neighbourhood Area by, amongst other things, demonstrating that adequate sustainable transport links to the principal village facilities including the village centre, the primary school, Health Centre and recreation open space already exist or will be provided.

21. As established above, the proposed development would not be supported by policy DP6 of the MSDP in terms of its location within the countryside, outside of a defined settlement boundary and clearly separated from such defined settlements. Furthermore, policy SA39 of the emerging SADPD sets out certain criteria under which proposals for specialist accommodation for older people and care homes will be supported, comprising where the site is allocated, part of a strategic allocation, located within the defined Built-Up Area Boundary, or where outside of that boundary it is contiguous with it and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy. The appeal site does not meet any of those criteria such that the proposed development would not be supported by that policy.
22. Section 9 of the Framework relates to promoting sustainable transport and in paragraph 105 states, amongst other things, that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
23. The nature of the proposed development would indicate that residents themselves would be unlikely to leave the site on their own in terms of accessing the wider area either on foot or by other means of transport, such as to local services and facilities such as shops. Nevertheless, there would be a number of staff and the likelihood of regular visiting by family and friends travelling to and from the site; and as referred to above the proposed development would be located outside of any settlements with defined District Plan boundaries, which would not be within easy walking distance of the site. There are a relatively small number of dwellings in the immediate vicinity of the site, notably including the small estate opposite the site. However, those would be unlikely to account for a significant number of people travelling to and from the site.
24. Furthermore, the speed of traffic along the A264 and B2028 and absence of dedicated cycle lanes in the close vicinity of the site would be likely to deter most cyclists. This is notwithstanding the presence of a solid white line to the side of and set away from the carriageway along most of the A264 between the Dukes Head roundabout and the main roundabout junction serving Copthorne towards its western end, which would be likely to provide some degree of separation from motorised traffic. Nevertheless, cycle usage to and from the site would be likely to be encouraged to some degree through the proposed planning obligations to enable works to be undertaken by the County Council relating to a scheme to manage traffic speeds on Turners Hill Road and improving pedestrian and cycle infrastructure and/or the Turners Hill Road cycle path, together with the proposed on-site cycle parking.
25. That District Plan defined built up area of Copthorne is relatively close, being in between Crawley and the site and would therefore involve relatively short travel distances, albeit still more likely to be by motorised transport than on foot or cycle, particularly from the more westerly parts of that settlement. Likewise, the low density housing north of Effingham Park would be in fairly close proximity, albeit again not within short walking distance and where I saw the intervening footway to be generally unlit.
26. The site is therefore by no means isolated from existing housing in the near and slightly wider vicinity from where vehicle trips would be quite short. Nevertheless, it remains the case that the more substantial wider populations,

such as in Crawley, East Grinstead and Crawley Down, from where most staff and visitors would be more likely to be drawn, would be at such distances as to involve the likelihood of significant use of and reliance on motorised transport to get to and from the site, albeit with easy access via the existing road network.

27. However, there are three bus stops within easy walking distance of the site serving bus routes east and westwards to Copthorne, Crawley and East Grinstead and southwards to Crawley Down, and to the nearest railway stations at Three Bridges and East Grinstead. Although not all local settlements are served by buses, a large number of people living in the wider area including relating to the above District Plan defined settlements would have such potential access to a bus service. There would inevitably be varying degrees of convenience for those coming to the site in terms of the proximity of bus stops to homes within those larger settlements. However, it remains the case that there are a number of services to different locations thereby increasing the likelihood of some degree of use.
28. A key factor in respect of likely bus usage would be the frequency of services to enable staff and visitors to get to and from the site at times to suit their requirements. The frequency relating to the three bus stops close to the site in each of the above directions varies, with the eastbound stop served by the least number; and in all cases Sunday services are noticeably less. Nevertheless, other than on Sundays, with a small number of exceptions there is generally at least one service an hour from early morning to late evening, serving each of those three local bus stops, and often more, ranging from one to four and in one case five per hour.
29. The bus services, particularly on Monday to Saturdays, therefore allow use throughout the day and at frequencies that would generally enable staff and visitors to utilise them at a variety of times. These may not fit in precisely with shift patterns or visiting times for all those potential users, necessitating varying degrees of planning around that or the inevitable use of private cars to some degree instead. However, the services are at a level likely to be sufficient to enable a good degree of usage should that be the chosen mode of transport. The more limited Sunday services are however only approximately two hourly and not to Crawley Down. That would still enable some degree of use, depending on where people are coming from, although it would be less likely to fit in with required timings.
30. The three bus stops concerned, and the pedestrian routes between them and the site, are well lit which would likely be a factor encouraging their use during hours of darkness. The proposals would also include the upgrading of the existing pathway between the site and the A264 junction to make it easier and safer to use for all pedestrians. In this respect, I note that the Local Highway Authority (LHA) is also satisfied that the proposed upgraded footway would provide a workable route for pedestrians to the nearest bus stops. The LHA also refers to all the bus stops being accessible along the existing footway network from Turners Hill Road, with informal dropped kerb crossing points provided over Turners Hill Road and Copthorne Common Road to provide access to the westbound bus stop. I have no substantive basis to consider differently.

31. The bus stops are however unsheltered which would be likely to make them less attractive for use in inclement weather, albeit that I have no substantive evidence to indicate the extent to which this would be likely to affect usage. Furthermore, their use would involve crossing the A264 and B2028 for at least one leg of any return journey. Whilst that could be a deterrent for some people using buses, I have not received any substantive evidence of this situation having caused any accidents to date involving pedestrians crossing the roads concerned, albeit that the proposed development would add to the potential numbers of people using those crossing points. Furthermore, the proposed development would include improvements to the Turners Hill Road crossing points, comprising dropped kerb tactile paving.
32. Walking alongside the A264, including for access to the bus stops, is in proximity to fast moving traffic. However, the road is wide and pedestrians are also protected to some degree by the separation provided by the solid white line on the road referred to previously. Whilst Turners Hill Road is narrower, the existing narrow and poor quality path alongside it is proposed to be widened and improved, and where approximately half of its length between the site and the Dukes Head roundabout is, and would be, set away from the roadside, separated by a grass verge. Furthermore, as referred to above, the planning obligations would secure the means to improve conditions for pedestrians and cyclists on Turners Hill Road.
33. I have had regard to another recent appeal decision relating to a proposed care home at Tilgate Forest Lodge in Pease Pottage<sup>1</sup> which was dismissed (the Tilgate decision). My colleague in making that decision, whilst citing benefits and applying associated weight to these, including in relation to meeting a need for older persons care accommodation, gave substantial weight to the development not being in an accessible location, albeit with some factors in its favour in this respect such as there being a pavement along the adjacent road, which also has nearby bus stops and is part of a National Cycle Route.
34. However, in that case, unlike for the current appeal, it was noted that the bus stops mainly rely on light spill from the adjacent A23 rather on the road concerned, albeit in that case one of the stops has a shelter. My colleague also referred to deficiencies in terms of the convenience of the bus service in that case. However, I do not have the full details of the level of provision concerned, including the extent of locations served by buses linking to the site in that case. For these reasons, that other appeal cannot be clearly compared with the current appeal in respect of this main issue which I have considered on its own merits. Furthermore, the planning balance resulting in the dismissal in that other case importantly also included, amongst other things, great weight being afforded to harm to the character and appearance of an Area of Outstanding Natural Beauty, which is not a designation relating to this appeal site.
35. The proposed development would include provision for a Travel Plan and a staff minibus service to incentivise the use of travel modes other than the private car. I acknowledge that there is no comparative objective evidence to demonstrate the extent to which the measures concerned would be likely to be utilised, which is a similar point to one made by my colleague in the Tilgate decision. There is also limited specific detail provided as to the how the

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<sup>1</sup> Appeal Ref. APP/D3830/W/20/3251365

proposed Travel Plan would operate in full at this stage, such as in relation to the proposed minibus service, albeit that this could be secured by a condition to ensure an appropriate level of provision. Nevertheless, despite figures submitted indicating that cycling and bus use in the wider area constitutes a low percentage of trips, the proposed Travel Plan would be likely to form a basis for encouraging the use of alternative modes of transport to the private car; and in respect of the minibus, a further means by which a choice of transport modes would be provided, albeit to an unknown extent.

36. I note that my colleague in the Tilgate decision refers to the proposed Travel Plan in that particular case as having a more limited practical effect, especially with regard to buses, albeit also referring to there being no compelling comparative objective evidence to suggest a likely take-up of staff car sharing. As referred to above I have insufficient evidence to indicate that the level of convenience of bus services to the current appeal site is comparable to that other case, and no mention was made in that decision of a minibus service as is proposed in this case.
37. The proposed development would also incorporate electric vehicle charging facilities. Whilst this would still relate to the use of individually owned private cars, it would nevertheless encourage the use of a more sustainable form of transport in terms of emissions.
38. I have also had regard to the extent to which staff and visitors would have access to local services and facilities such as shops, health and leisure provision. The extent of such a need to access facilities close to the workplace for staff as opposed to close to where they live is disputed by the parties. Nevertheless, the prime reason for the journey from home to the site for staff would be to work, albeit that it cannot be generally disregarded that people at or travelling to and from a place of work would not reasonably wish to combine this with other visits to services and facilities before or after work or during breaks. There would therefore be limited scope for this or for visitors to do so also within the close vicinity of the site.
39. A lot of mention was made at the Inquiry of the shop and takeaway provision at the nearby petrol filling station on the A264. I saw that this is fairly easily accessible from the site, albeit via the road crossing points in the vicinity of the Dukes Head roundabout and on a narrow path alongside moderately fast-moving traffic on the road. For reasons referred to previously relating to walking alongside the roads concerned, together with there being street lighting for much of the route, the shop concerned would be likely to comprise a useable and potential destination. However, the nature of the shop is such that it only offers a limited facility in terms of general shopping provision, with provision likely to cater more for small-scale top-up shopping, lunch or snacks for example.
40. Other than that shop and the public house located adjacent to the Dukes Head roundabout, there are little or no other services and facilities in the close vicinity of the site, accessible on foot. However, the proposed development would include on-site catering facilities, with provision for a café shown on the plans which would be likely to lessen reliance on outside food outlets to at least some degree in relation to meal provision for staff.
41. I have also had regard to whether the circumstances in terms of access to services and facilities would be similar to those relating to general purpose

Class C3 housing, having regard to other recent appeal decisions for housing developments in the vicinity of the site. These include proposed developments referred to by the Council at Land off Turners Hill Road, Crawley Down including 167 dwellings<sup>2</sup>; The Park Farm, Snow Hill, Crawley Down for two dwellings<sup>3</sup>; and at land rear of Star Place, Copthorne Common Road for either 2 or 3 dwellings<sup>4</sup>, all of which were dismissed. However, despite those decisions citing, amongst other things, matters relating to the locations not being sustainable in transport terms, that was in a different context to a care home proposal whereby the residents themselves would not be reliant on accessing outside services and facilities independently; and where staff and visitors would be likely to live elsewhere, thereby being less likely to be so reliant on there being services and facilities within close proximity of the site. Furthermore, even if there were to be more sequentially preferable sites in the local area to meet any local need, I have determined this appeal on its merits.

42. I have had regard to the planning permission recently granted for a change of use on the adjacent Rowan site from an existing dwelling and outbuildings to create a Class C2 care facility. The Council granted planning permission for that use and acknowledged factors such as proximity to bus routes and provision for electric vehicle charging. However, it was a balanced decision, taking account of need for the accommodation, referring to it not being in a sustainable location in relation to access to shops and other services and with a reliance on the private motor car. However, in that case the balance included the factor of the site already being developed and in existing residential use, unlike the current appeal site. This in itself is therefore a significant difference to the circumstances of the appeal proposal.
43. For the above reasons, together with not being supported by policy DP6 of the MSDP, or emerging SADPD policy SA39 in terms of not relating to an allocation and not being contiguous with the Built-Up Area Boundary, the proposed development would have some shortcomings in terms of the Council's spatial strategy with particular regard to sustainable travel, having regard to local and national policy. As such, it would also conflict with policy DP21 of the MSDP, policy CDNP10 of the CDNP and paragraph 105 of the Framework. However, also for the above reasons, including the likelihood that there would be some degree of choice of transport modes, the extent of any harm relating to this issue would be limited. I shall consider this further in the planning balance.

#### *Need*

44. The MSDP appropriately addresses the need and supports proposals for housing for older people through policies DP25 and DP30. The former states, amongst other things, that the provision of community facilities and local services that contribute to creating sustainable communities will be supported and that such facilities and services to meet local needs will be identified through Neighbourhood Plans or a Site Allocations Development Plan Document. Furthermore, policy DP30, relating to housing mix, states that to support sustainable communities, housing development will, amongst other things, meet the current and future needs of different groups in the community including older people. It goes on to state that if a shortfall is identified in the supply of specialist accommodation and care homes falling within Use Class C2

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<sup>2</sup> Appeal Ref. APP/D3830/W/16/3142489

<sup>3</sup> Appeal Ref. APP/D3830/W/17/3181272

<sup>4</sup> Appeal Refs. APP/D3830/W/21/3268144 & 3268145



to meet demand in the District, the Council will consider allocating sites for such use through a Site Allocations Document.

45. It is not disputed that the proposed development would meet a need for registered care accommodation. However, the weight to be afforded to such a benefit is disputed, having regard to the existing and projected supply and demand. It is this that I will therefore consider in more detail.
46. In terms of the methodology used to assess the level of need for registered care beds, the Council undertook an assessment of housing need for older people, published as an addendum to the Housing and Economic Development Needs Assessment (HEDNA) in August 2016. The HEDNA Addendum forms part of the evidence base for the MSDP and the assessment was undertaken using the Strategic Housing for Older People Analysis tool (the SHOP@ tool). This tool has limitations, including that it is based on national population prevalence data rather than local, and is claimed by the Council to be out of date. Nevertheless, it is common ground between the Council and Appellant that it is the latest published assessment of older persons accommodation needs in the Mid Sussex Council Area. Furthermore, whilst reference has been made to the new Strategic Housing Market Assessment (the SHMA), the Council has confirmed that it does not rely on the evidence in the SHMA for the purposes of this appeal, and I have no substantive basis to consider otherwise.
47. A lot of time was taken up in the Inquiry with consideration of the level of need having regard to the HEDNA Addendum methodology, which after all is that which the Council saw fit to use as its evidence base for the adopted MSDP, as has been the case with other relatively recent Inquiry decisions relating to housing for older people including those at Albourne<sup>5</sup> and Pease Pottage<sup>6</sup>, albeit that the former related to provision for extra care units as opposed to a care home.
48. It is also agreed by the Council and Appellant that another frequently used methodology within the sector is based upon care home occupancy by age based on prevalence rates researched by sector specialists LaingBuisson. This methodology is also referred to by the Appellant alongside the HEDNA Addendum/SHOP@ tool but is not relied upon in isolation. It is agreed by the parties that the level of demand shown by the LaingBuisson research indicates a significantly lower demand for care beds for the elderly than under HEDNA/SHOP@. However, as highlighted by the Appellant, the bed numbers concerned in relation to the application of LaingBuisson are a baseline as, amongst other things, the rate is based on occupation of bedspaces and is therefore suppressed due to those areas of the country where there are insufficient beds to meet demand. I have received no substantive rejection of that being the case from the Council. The Appellant has indicated that the true level of need is likely to fall at a point between the figures relating to the two methodologies. However, I have no substantive basis to support the extent to which that would be the case, especially given uncertainty around the extent to which the level of demand has been suppressed. Therefore, for the above reasons, it seems to me that, notwithstanding its limitations, the HEDNA Addendum is the most appropriate methodology to adopt for the purposes of this appeal.

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<sup>5</sup> Appeal Ref. APP/D3830/W/19/3241644

<sup>6</sup> Appeal Ref. APP/D3830/W/20/3251365

49. Having regard to the HEDNA/SHOP@ methodology, in terms of need for registered care beds within the MSDP plan period up to 2031, on a purely quantitative basis, based on a demand for 2442 beds and supply of 1518 as of November 2021, this would amount to 924 beds. The corresponding immediate need as of November 2021, based on a demand for 1806 beds would be 288 beds. These figures in themselves represent significant shortfalls.
50. Furthermore, they do not take account of the significant number of rooms which are not single occupancy and are without any ensuite facilities, agreed by the Council and Appellant to now be a reasonable minimum expectation for registered care bedrooms for older people. On that basis, the need over the plan period would be for 1294 beds, with an immediate need, agreed to be the more important figure, of 658 beds based on a current supply of rooms with at least an ensuite toilet and/or bathroom of 1148 rooms. The Appellant considers that the timescale for completion of the proposed development would be by 2025 which I have no substantive basis to disagree with, especially as there is an operator involved subject to planning permission being granted. Based on a demand then for 2123 beds, there would be a need by that time of an additional 317 beds on top of the above immediate need figures.
51. On the Appellant's figures, in the absence of anything similar from the Council, only 11 of the 37 registered care homes in the District have any rooms with an ensuite facility including a wetroom, with an estimate of a small number more than 589 of the current 1518 supply of bedrooms having such a facility. I have no substantive basis to disagree with this analysis and acknowledge that such provision, as is proposed in this case, would prevent the need for sharing such facilities, both from a wellbeing perspective and to minimise the spread of infections. On that basis the need would be much greater than the consideration relating to provision of only the minimum ensuite facilities.
52. It is important to consider the extent to which the above need figures would be likely to be addressed through any proposed care homes in the pipeline and the facilitation of such development in the development plan, including any allocated sites for this purpose in the emerging SADPD. In terms of those in the pipeline in Mid Sussex, there are two proposals with planning permission and one, at the time of the Inquiry, awaiting a decision. I have not been informed that the two with permission (at Haywards Heath and Sayers Common for 67 and 70 bedrooms respectively) are under construction, albeit that could change at any time, notwithstanding the Appellant's claim that they currently have no associated operators.
53. Furthermore, the degree of uncertainty until a decision is made relating to the third proposal in Burgess Hill for 68 bedrooms, reduces the weight afforded to that additional potential supply. Nevertheless, even if permission were to be granted for that one and all three were to be constructed, providing a total of 205 bedrooms, it is uncertain as to when they would be completed. Not being in place now, and even with the minimum period necessary until completion, means that they do not address the immediate need referred to above. Even if built by 2025 those 205 bedrooms would still fall significantly short of even the additional need of 317 beds referred to above, on top of which there would remain the current immediate need figures.
54. I acknowledge that the relevant MSDP policies and emerging SADPD policy SA39 provide support for such proposals, that future proposals may come

forward, and that there will be likely to be some natural replacement of that existing provision without the minimum ensuite facilities. I also note that emerging policy SA39 was added to take account of the previously referred to Albourne appeal decision which underlines the importance of providing for older persons housing. This is with reference to what is now paragraph 62 of the Framework and the Planning Practice Guidance which stresses that the need to provide housing for older people is critical in view of the rising numbers in the overall population.

55. That emerging policy provides clear support for care homes and has been proposed in the context of an identified need. However, based on the evidence before me, there remains uncertainty as to the extent to which it will result in the significant unmet need identified above being addressed, in the shorter term and within the MSDP period, in terms of the scale and nature of that need, particularly when taking account of the qualitative factors, including ensuite provision, and given that there is only one site allocated in the SADPD for C2 use.
56. There is also an additional factor concerning attrition rates whereby it would not necessarily just be non-ensuite rooms lost if and when those homes close which have both ensuite and non-ensuite rooms. This would therefore add to the unmet need for suitable care home accommodation, albeit partially offset by recent new developments and acknowledging that there is no clear evidence as to ongoing attrition rates despite evidence of some closures over the last few years.
57. A further factor potentially impinging on the degree to which care home need will be met during the MSDP period relates to the undisputed evidence provided by the Appellant relating to viability and land value factors. This identifies that it is hard for such care home development to compete with general needs housebuilders on housing sites not specifically allocated for housing for older people, including care homes, but which could in theory be suitable for this.
58. The SADPD allocation referred to above includes, amongst other things, Class C2 Use for a minimum of 142 dwellings, relating to a site in East Grinstead, Ref SA20. That allocation is not specifically for a registered care home such that it could be developed for extra care, claimed by the Appellant to be more likely given the number of rooms the allocation relates to. However, even if that were built as a registered care home, it again does not change the immediate need and remains not having any planning permission in place, resulting in uncertainty as to if and when it would be constructed in order to meet the need within the MSDP period. Furthermore, in itself it would only address a relatively small proportion of the overall need during the plan period, whether relating this to supply generally or just that with at least the minimum ensuite facilities.
59. The Council highlights the extent to which there is increasing diversification within the care sector with less emphasis on registered care beds than expected as opposed to extra care in particular, albeit citing work carried out in Hampshire. The particular demand for extra care provision was a point made by my colleague in the previously referred to Albourne decision. However, that appeal related to proposed extra care units and so did not address, in the same way as in this case, the specific need for registered care. That is a clear difference between the two cases, whereby I have considered this proposal on

its own merits. Whilst I acknowledge the likelihood of increased diversification going forward, the extent to which that would affect an ongoing remaining need for registered care homes in Mid Sussex is unclear, particularly given the extent of the current and future need within the MSDP period referred to above.

60. The Council highlights that the Appellant did not previously identify qualitative aspects of need in representations to the SADPD, in the Statement of Case or in Mr Burden's proof of evidence. Although such qualitative analysis was introduced in and relates to Mr Newton Taylor's evidence, it is nevertheless somewhat puzzling as to why it was not otherwise previously introduced by the Appellant given the extent to which it is now relied upon. Despite that, it was a matter fully explored at the Inquiry, as a result of which I have found it to be an important issue for consideration.
61. For the above reasons, I conclude on this issue that there is a significant unmet need for registered care homes in Mid Sussex, more so in relation to provision for bedrooms that have at least the minimum ensuite facilities. In considering the extent of the shortfall in the context of the critical need for such accommodation nationally, I afford substantial weight to the benefit of adding to the local supply with the proposed care home. That benefit is strengthened by the circumstances whereby there is an operator committed to the proposal subject to gaining planning permission, indicating a likelihood of relatively short term implementation, and given the intended provision for full wetroom ensuite facilities, thereby exceeding what was agreed to be the minimum requirement.

#### *Other Matters*

62. Having regard to matters of highway safety, the Appellant has submitted a Transport Statement (TS) which forecasts that the proposed development would have no perceptible material impact on the local transport network. Furthermore, it is common ground between the Council and Appellant that the trip rates set out in the TS are appropriate for the proposed development and that the forecast trip generation would not exceed the traffic levels that were previously considered acceptable by the LHA for a previous application for residential development on the site. I have no substantive basis to consider otherwise.
63. In relation to the nearby Copthorne Preparatory School, whilst any increases in pupil numbers would potentially add to that existing level of traffic upon which the TS was based, evidence produced at the Inquiry suggested that such expansion of the school may not be going ahead. In any case, even if there were any expansion, that would need to be a matter for consideration at that time in terms of any related highways safety implications.
64. The LHA has raised no objections to the proposed development on highway safety grounds and I have no substantive basis to consider differently subject to appropriate conditions and planning obligations. Furthermore, the LHA is satisfied that there would be sufficient parking provision on the site for the level of usage likely with development of the nature proposed, and again I have no substantive basis to consider differently.
65. With regard to noise concerns, comings and goings in relation to the site and its vicinity would inevitably increase due to the existing undeveloped nature of the site. However, in the context of other traffic movements locally on the adjacent roads and in relation to existing residential development in the locality

this would be unlikely to cause significantly increased or unexpected levels of noise to surrounding occupiers. Furthermore, given the positioning of the proposed car parking areas, served by access directly onto Turners Hill Road, much of the vehicular activity would be generally focussed away from the quieter rear of the site. Other potential noise from construction activity and any plant and machinery within the proposed development could also be appropriately controlled through conditions. For future residents, measures to protect them from unacceptable levels of noise from the adjacent road, could be appropriately secured by condition in relation to the detailed design of the building concerned.

66. With regard to the ecology of the site, the Appellant has undertaken a Preliminary Ecological Appraisal, a Preliminary Bat Roost Assessment and analysis concerning Biodiversity Net Gain (the Ecological Report) which assesses the site as being of local ecological importance; and an Arboricultural Impact Assessment with associated Arboricultural Note, both of which I have taken into account. The proposals would involve the loss of a significant number of trees and associated understorey habitat and the ecological report highlights that there would be a net loss of biodiversity on the site as a result of the proposed development. However, the tree loss would mainly be in the central part of the site primarily comprising early successional species and young semi-mature trees. The generally higher quality mature boundary trees, protected by Tree Preservation Order (TPO), with varied understorey would generally be retained. In this respect, those proposed to be removed to make way for the proposed site access are classified in the ecology report as Category C trees as opposed to those either side being Category B and I have no substantive basis to disagree with such categorisation.
67. Furthermore, the Council's Tree Officer raises no objections on arboricultural grounds, subject to appropriate conditions, having regard to the position of the proposed access in terms of measures to mitigate its impact on two larger trees either side; that there would not otherwise be any excavation works within the root protection areas of trees retained at the site boundaries; and referring to appropriate proposed new tree planting on the site, subject to the need for the submission of a detailed planting plan which could be secured by condition.
68. The Ecology Report highlights that no trees with potential for bat roosting would be removed and that there would be a suitable buffer between the development and the trees concerned to prevent disturbance. Nevertheless, only one tree was found to possess moderate, as opposed to otherwise low, potential to support roosting bats. The report, amongst other things, also draws attention to the need to conduct sensitive vegetation removal including in respect of breeding birds, reptiles and hedgehogs. It also highlights that there are no records of badgers within two kilometres of the site in the past 20 years and that no signs of badgers were found on the site during the survey work undertaken. I have no substantive basis to consider otherwise.
69. In terms of those conditions suggested by the Council as being necessary in the event of the appeal being allowed, those that would relate to ecological mitigation would importantly include securing the protection of intended retained trees, and their associated understoreys and habitat value, during the construction phase. It is also likely that proposed new tree and hedge planting and other soft landscaping, further details of which could also be secured by

condition, would provide some degree of replacement or improved habitat. With such conditions, and for the above reasons, despite a net loss of biodiversity on the site, it is therefore likely that any harm to the ecological value of the site would be limited and not to an unacceptable level.

70. In respect of the potential effects on the amenities of surrounding residents relating to increased levels of lighting and pollution generated as a result of the proposed development, I have no substantive basis to consider that any such increases would cause significant additional harm. Furthermore, measures to control odours, any external lighting, and to ensure adequate air quality associated with the proposed development, could all be appropriately controlled by conditions.
71. Having regard to concerns over the impact of the proposed development on the local medical infrastructure, I have no substantive evidence to indicate that this would be likely to cause significant additional pressure on such provision, especially as the nature of the proposed development would involve a level of care within the home itself.
72. In terms of any additional strain that may be caused by the proposed development on local drainage infrastructure, I have received no substantive evidence to indicate that foul and surface water could not be adequately disposed of from the proposed developed site, subject to details that could be secured by condition. In this respect, I also note that the Council's Flood Risk and Drainage Team raises no objections in respect of drainage subject to further details being submitted through a condition.

#### *Conditions and planning obligations*

73. The Council has submitted 25 suggested conditions were I minded to allow the appeal. These follow the submission of an amended schedule where one new suggested condition has been added. These are generally agreed by the Appellant who has also confirmed agreement to the imposition of the pre-commencement conditions concerned. I have considered these in the light of advice in the National Planning Practice Guidance and have, in the interests of clarity and precision, amended some of the wording, combined two of the originally suggested conditions and added one. I have referred to the condition numbers, cross referenced to the attached annex, in brackets for clarity purposes.
74. For certainty, the standard time condition for commencement of the development (1), and a condition requiring the development to be carried out in accordance with the approved plans (2), would be necessary.
75. In the interests of highway safety conditions would be necessary to secure: the completion of the proposed off-site footway and tactile paving crossing points alongside Turners Hill Road, also so as to provide sustainable travel options (3); the submission and implementation of a Construction Management Plan, also to protect the amenities of surrounding residents and the area generally (6); the completion of the proposed site access (13). Also, to provide sustainable travel options, conditions would be necessary to secure details and the implementation of covered and secure cycle parking spaces on the site (14); the implementation of the proposed electric vehicle charging spaces (23); and the submission and implementation of a Travel Plan, including provision for a staff minibus (24).

76. So as to provide adequate drainage of the site, conditions would be necessary to secure the submission and implementation of details of foul and surface water drainage measures (4 & 5).
77. In the interests of tree protection, the character and appearance of the area, and the ecological value of the site, a condition would be necessary to secure the implementation of proposed arboricultural measures (7). Also in the interests of the character and appearance of the area conditions would be necessary to secure the submission and implementation of: samples of facing materials and finishes proposed to be used in the construction of the proposed development (8); further details of various architectural elements of the proposed development (9); hard and soft landscaping details (12), also in the interests of the site's ecological value; details of the proposed bin store, pumping station and sub-station (22).
78. To protect the living conditions of local residents, conditions would be necessary to: control the hours of construction and demolition works as well as the times for deliveries or collection of plant, equipment or materials during the construction phase (10); secure measures for controlling the emission of fumes and odour and noise from the proposed development (15 & 16), also in the interests of the living conditions of prospective residents; secure measures to mitigate any risks from landfill/ground gas, also in the interests of the living conditions of prospective residents (17); secure details prior to implementation of any external lighting (18); ensure adequate levels of air quality relating to the proposed development (19), also in the interests of the living conditions of prospective residents. In order to protect the amenities of residents of the proposed development in respect of noise generated by traffic or other external sources, a condition would be necessary to secure details and implementation of appropriate mitigation measures (20).
79. In order to protect the local environment and the safety of construction workers and future and existing residents, a condition would be necessary to secure provision during construction for the remediation of any contamination found at the site that had not been previously identified (11).
80. Having regard to the safe movement of aircraft and the operation of Gatwick Airport, a condition would be necessary to secure the submission and implementation of a Bird Hazard Management Plan so as to minimise the attractiveness of the proposed roof area to birds (21).
81. An additional condition (25) to require the implementation and retention of the proposed car parking spaces would also be necessary in the interests of ensuring provision for adequate parking and highway safety. Whilst this would be additional to those suggested and discussed at the Inquiry, I consider that the Appellant would not be prejudiced by this as it would not require anything not already proposed, as shown on the submitted plans; and would not be unexpected as it is a condition already suggested by the LHA in its consultation response to the application concerned.
82. Planning Obligations have been submitted within a Section 106 Agreement making provision for the following:
- Appropriate financial contribution towards local library provision relating to additional stock that would be required at East Grinstead Library, including on the basis that the library service is proactive in its contact

with residents of care homes as a result of the benefit to stimulation and engagement that the services can provide. This would be in accordance with the Framework which, in paragraph 93 sets out that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should, amongst other things, plan positively for the provision and use of community facilities and other local services to enhance the sustainability of communities and residential environments; and the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document (the SPD) which highlights, amongst other things, that where a library is unable to meet standards due to development, a reasonable contribution will be requested towards the service.

- Appropriate financial contribution relating to works undertaken by the County Council concerning a scheme to manage traffic speeds on Turners Hill Road and improving pedestrian and cycle infrastructure and/or the Turners Hill Road cycle path, so as to encourage less car dependency and the use of sustainable transport modes, particularly by staff and visitors. This would be in accordance with the Framework which in paragraph 104 states, amongst other things, that opportunities to promote walking, cycling and public transport use are identified and pursued; and with the SPD which in respect of this matter relates to ensuring provision of an efficient and sustainable transport network and highlights the MSDP policy DP19 aim to facilitate and promote the increased use of alternative means of transport to the private car.
83. The Council and West Sussex County Council have submitted a statement of compliance of the planning obligations with Regulation 122 of the Community Infrastructure Regulations 2010 (as amended) (CIL Regulations). Based on that evidence, policy DP20 of the MSDP relating to securing infrastructure, the relevant paragraphs of the Framework and the SPD, I am satisfied that the provisions, would meet the tests set out in paragraph 57 of the Framework and Regulation 122(2) of the CIL Regulations.

#### *Planning balance*

84. I have found that the proposed development, as well as not being supported by policy DP6 of the MSDP, would cause some harm to the landscape character and appearance of the site and surrounding area. However, for the reasons set out, the extent of that harm would be limited.
85. I have also found that, together with the proposed development not being supported by policy DP6 of the MSDP, or emerging SADPD policy SA39, it would have some shortcomings in terms of the Council's spatial strategy with particular regard to sustainable travel, having regard to local and national policy. However, again for the reasons set out, the extent of any harm would be limited.
86. The proposed development would however contribute towards what I have found to be a significant unmet need for registered care homes in Mid Sussex, more so in relation to provision for bedrooms that have at least the minimum ensuite facilities, causing me to afford substantial weight to the benefit of adding to the local supply with the proposed care home. I have also found that that benefit is strengthened by the circumstances whereby there is an operator committed to the proposal subject to gaining planning permission, indicating a



likelihood of relatively short term implementation, and given the intended provision for full wetroom ensuite facilities, thereby exceeding what was agreed to be the minimum requirement. There would also be the likelihood of added local economic benefits associated with the jobs generated by the proposed development, both during its construction in the shorter term and once operational in the longer term.

87. Notwithstanding my findings in relation to the first two main issues, I have found there to be no other matters that would cause unacceptable harm, subject to appropriate conditions and planning obligations where applicable.
88. Applications for planning permission must be determined in accordance with an up-to-date development plan unless material considerations in a particular case indicate that the plan should not be followed. Taking all of the above into account, the benefits of the proposed development, comprising material considerations, would outweigh the harm that I have identified and the conflict with development plan policies. As such, the material considerations in this case indicate that planning permission should be granted that is not in accordance with the development plan.
89. Some Inquiry time was taken up with the disputed matter of whether the policies which are most important for determining the appeal are out of date. Whilst I have considered the submissions on this matter, I have not dealt with this in detail in light of the above overall planning balance, which does not rely on whether or not the tilted balance relating to paragraph 11(d)(ii) of the Framework applies.

### **Conclusion**

90. For the reasons given above I conclude that the appeal should be allowed.

*Andrew Dawe*

INSPECTOR

## **APPEARANCES**

### FOR THE APPELLANT:

Christopher Young QC, No5 Chambers

Instructed by Timothy Burden,  
Turley Associates

He called:

Clare Brockhurst (for round table discussion  
on landscape matters)

Director, Leyton Place Limited

Matthew Grist

Director and Head of Transport  
Planning, Jubb

Nigel Newton Taylor

Director, HPC

Richard Garside

Director and Head of  
Development Consultancy,  
Newsteer

Timothy Burden

Director, Turley Associates

### FOR THE LOCAL PLANNING AUTHORITY:

Jack Parker, Barrister Cornerstone Barristers

Instructed by Tom Clark, Mid  
Sussex District Council

He called:

Christopher Tunnell

Director of Planning and Leader  
of the London Planning Group,  
Arup

Also participated in round table discussion on conditions:

Susan Dubberley

Mid Sussex District Council

## **INQUIRY DOCUMENTS (IDS):**

1. Opening Statement made on behalf of the Appellant.
2. Opening Statement for Mid Sussex District Council.
3. PPG - Housing for older and disabled people.
4. Government response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People.
5. Suggested viewpoints and locations for site visit.
6. Suggested Conditions.
7. Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document.
8. Appellant's agreement to pre-commencement conditions.
9. Location plan prepared by Appellant for site relating to appeal ref APP/D3830/W/20/3251365 – Tilgate Forest Lodge, Brighton Road, Pease Pottage.
10. Planning Statement and site plan supporting MSDC Planning Application: DM/21/3385 – Land to the south of Kings Way, Burgess Hill, West Sussex.
11. Appellant's Costs Application.
12. Plan showing proposed off-site footpath and crossing works: dwg no. 006 Rev P1.
13. Amended suggested conditions.
14. Details of notifications carried out for Rowan planning application Ref DM/21/0028.
15. Crawley Observer article 18 November 2021 concerning Copthorne Preparatory School.
16. Further amended suggested conditions 28 January 2022 and confirmation of the Appellant's agreement to those that would be pre-commencement conditions.
17. Council's response to Appellant's costs application.
18. Closing Statement for Mid Sussex District Council.
19. Closing Statement made on behalf of the Appellant.
20. Email dated 21 January 2022 from the Council to clarify its position with regard to evidence in the HEDNA Addendum 2016 and 2021 SHMA.

## **ANNEX - Conditions**

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.
2. The development hereby permitted shall be carried out in accordance with the plans listed below:
  - Site Location Plan 100 Rev A
  - Site Roof Plan 176 106 Rev -
  - Cut and Fill Plan – Site Roof Plan 176 107 Rev-
  - Elevations 176 125 Rev A
  - Elevations 176 126 Rev A
  - Elevations 176 127 Rev A
  - Ground Floor Plan 176 114 Rev A
  - First Floor Plan 176 115 Rev A
  - Second Floor Plan 176 116 Rev A
  - Roof Plan 176 117 Rev A
  - Landscape Proposals RDL712 DRG01 P4
  - Landscape Sections and Entrance Details RDL712 DRG02 P5
  - 20191 001 Rev P1 Proposed Vehicular Access
  - 20191 006 Rev P1 – Proposed off site footpath and crossing works.
3. No part of the development shall be occupied until provision of the footway and tactile paving crossing points alongside Turners Hill Road has been constructed in accordance with plan: 20191 006 Rev P1.
4. No development shall take place unless and until details of the proposed foul water drainage and means of disposal have been submitted to and approved in writing by the Local Planning Authority. No building shall be occupied until all the drainage works concerned have been carried out in accordance with the approved details. Maintenance and management during the lifetime of the development shall be in accordance with the approved details.
5. No development shall take place unless and until details of the surface water drainage and have been submitted to and approved in writing by the Local Planning Authority. No building shall be occupied until all the drainage works concerned have been carried out in accordance with the approved details. Maintenance and management during the lifetime of the development shall be in accordance with the approved details.
6. No development shall take place, including any works of demolition, until a Construction Management Plan (CMP) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved CMP shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate, but not necessarily restricted to, the following matters:
  - the anticipated number, frequency and types of vehicles used during construction;
  - the method of controlling surface water during construction;
  - the method of access and routing of vehicles during construction;
  - the parking of vehicles by site operatives and visitors;
  - the loading and unloading of plant, materials and waste;

- the storage of plant and materials used in construction of the development,
  - the erection and maintenance of security hoarding;
  - the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders, if required);
  - details of public engagement both prior to and during construction works;
  - measures to control noise affecting nearby residents;
  - dust control measures;
  - pollution incident control.
7. The development hereby permitted shall be carried out in accordance with the Arboricultural Impact Assessment (reference 12622\_R01\_A) dated 14th August 2020 and the Arboricultural Note (reference 13340-C001a\_JP\_270121) dated 27<sup>th</sup> January 2021, which shall be implemented and adhered to throughout the entire construction period.
8. No development shall be carried out above ground slab level until samples of materials and finishes to be used for all facing materials, including the external walls/roof/fenestration of the proposed buildings, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
9. No development shall be carried out above ground slab level until 1:20 scale section and elevations (vignettes) of:
- (a) the single storey frontage showing the entrance, green roof and columns;
  - (b) a typical dormer window;
  - (c) a chimney;
  - (d) a first-floor terrace/balcony;

have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

10. Works of construction or demolition, including the use of plant and machinery, necessary for implementation of this consent, as well as deliveries or collection of plant, equipment or materials for use during the demolition/construction phase, shall be limited to the following times:

Monday – Friday: 08:00 - 18:00 Hours

Saturday: 09:00 - 13:00 Hours

Sundays and Bank/Public Holidays: None permitted

11. If during construction, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing by the Local Planning Authority), shall be carried out until a method statement identifying and assessing the risk and proposing remediation measures, together with a programme, has been submitted to and approved in writing by the Local Planning Authority. The remediation measures shall be carried out as approved and in accordance with the approved programme. If

no unexpected contamination is encountered during development works, on completion of works and prior to first occupation of the proposed development, a letter confirming this shall be submitted to the Local Planning Authority. If unexpected contamination is encountered during development works, on completion of works and prior to first occupation of the proposed development, the agreed information, results of investigation and details of any remediation undertaken shall be submitted to and approved in writing by the Local Planning Authority.

12. No development shall be carried out above ground slab level until full details of both hard and soft landscaping, which shall include indications of all existing trees and hedgerows on the land, and details of those to be retained, together with measures for their protection in the course of development, have been submitted to and approved in writing by the Local Planning Authority, which shall be carried out as approved.

Hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the first occupation of any part of the development, or in accordance with a programme which, prior to such occupation, shall first have been submitted to and approved in writing by the Local Planning Authority. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

13. No part of the proposed development shall be first occupied until such time as the vehicular access serving the development has been constructed in accordance with the submitted details shown on the drawing titled Proposed Vehicular Access 20191\_001\_P1.
14. No part of the development shall be first occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details that shall first have been submitted to and approved in writing by the Local Planning Authority. The cycle parking spaces shall thereafter be maintained as such thereafter for the purpose of cycle parking.
15. The development hereby permitted shall not be brought into use until a scheme for the installation of equipment to control the emission of fumes and odour from the premises has been submitted to and approved in writing by the Local Planning Authority, and the scheme as approved has been implemented. The equipment concerned shall thereafter be maintained in accordance with the approved details. The submitted odour control scheme shall be in accordance with current best practice and shall include an odour risk assessment, as well as a maintenance and monitoring schedule for the odour control system, to ensure adequate control of odours, to align with the manufacturer's instructions.
16. The development hereby permitted shall not come into operation until a scheme has been submitted to and approved in writing by the Local Planning Authority demonstrating that the noise rating level (L<sub>Ar</sub>,Tr) of plant and machinery within the development shall be at least 5dB below the background noise level (L<sub>A90</sub>,T) at the nearest residential facade. All measurements shall

be defined and derived in accordance with BS4142: 2014+A1:2019. The assessment shall be carried out with the plant/machinery operating at its maximum setting. The approved measures shall be implemented before the development is brought into first use and thereafter be maintained in accordance with the approved details.

17. Before the development hereby permitted commences, an investigation and risk assessment for landfill/ground gas to ascertain whether gas protection measures are required shall be undertaken. The investigation and risk assessment shall be undertaken by competent persons and a written report of the findings shall be submitted to, and approved in writing by, the Local Planning Authority. Where gas protection measures are required the details of these shall be submitted to, and approved in writing by, the Local Planning Authority. All required gas protection measures shall be installed before the development is occupied.
18. Prior to the installation of any external lighting to the site, details of light intensity, spread and any shielding and times of use together with a report to demonstrate its effect on nearby residential properties shall be submitted to and approved in writing by the Local Planning Authority. It is recommended that the information be provided in a format that demonstrates compliance with the ILP Guidance Notes for the Reduction of Obtrusive Light. Relevant information is available from the following site: <https://www.theilp.org.uk/documents/obtrusive-light>. The lighting concerned shall be implemented in accordance with the approved details and maintained as such thereafter.
19. Prior to the commencement of construction of any part of the development hereby permitted, the details of a scheme of mitigation measures to improve air quality relating to the development shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be in accordance with, and to a value derived in accordance with, the Air Quality and Emissions Mitigation Guidance for Sussex which is current at the time of the submission of the scheme to the Local Planning Authority. All works which form part of the approved scheme shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.
20. No development shall take place until a scheme for protecting the proposed residential units from noise generated by traffic or other external sources, has been submitted to, and approved in writing by, the Local Planning Authority. All works that form part of the scheme shall be completed in accordance with the approved details before any part of the noise sensitive development is occupied. Unless otherwise agreed in writing, the submitted scheme shall demonstrate that the maximum internal noise levels in bedrooms post construction will be 30 dB LAeq T (where T is 23:00 - 07:00) and in bedrooms and living rooms will be 35 dB LAeq T (where T is 07:00 - 23:00). Noise from individual external events typical to the area shall not exceed 45 dB LAm<sub>ax</sub> when measured in bedrooms internally between 23:00 and 07:00, post construction. In the event that the required internal noise levels can only be achieved with windows closed, then the applicant shall submit details of an alternative means of ventilation with sufficient capacity to ensure thermal comfort of the occupants with the windows closed.

Unless agreed in writing, noise levels in gardens and outdoor living areas shall not exceed 55 dB LAeq 1 hr when measured at any period.

Details of post installation acoustic installation testing shall be submitted to and approved in writing by the Local Planning Authority upon request.

21. Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of: management of any flat/shallow pitched roofs on the proposed building which may be attractive to nesting, roosting and "loafing" birds. The Bird Hazard Management Plan shall be implemented as approved upon completion of the roof and shall remain in force for the life of the building. No subsequent alterations to the plan shall take place unless first submitted to and approved in writing by the Local Planning Authority.
22. No part of the development hereby permitted shall be first occupied until the proposed bin store, pumping station and sub-station have been implemented in accordance with drawings showing their details that shall firstly have been submitted to and approved in writing by the Local Planning Authority.
23. No part of the development hereby permitted shall be first occupied until the electric vehicle charging space(s) have been provided in accordance with plans and details which shall firstly have been submitted to and approved in writing by the Local Planning Authority.
24. Prior to the first occupation of the development hereby permitted, a Travel Plan including the provision of a staff minibus shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be implemented as approved unless otherwise agreed in writing by the Local Planning Authority.
25. No part of the development hereby permitted shall be first occupied until the car parking areas have been constructed and provided in accordance with the approved plans. The car parking spaces shall thereafter be retained at all times for their designated purpose.



## **APPENDIX 4**



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## Appeal Decision

Hearing 28 September 2021

Site visit made on 6 July 2021 and 28 September 2021

**by Rachael Pipkin BA (Hons) MPhil MRTPI**

an Inspector appointed by the Secretary of State

**Decision date: 2 November 2021**

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**Appeal Ref: APP/G2245/W/21/3271595**

**Kent and Surrey Golf and Country Club, Crouch House Road, Edenbridge  
TN8 5LQ**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Pacalis Group Companies, BLCP Eden 1 Ltd and BLCP Eden 2 Ltd against the decision of Sevenoaks District Council.
  - The application Ref 19/02834/OUT, dated 20 September 2019, was refused by notice dated 25 September 2020.
  - The development proposed is replacement of existing golf clubhouse and hotel following demolition of existing to create a continuing care retirement community (CCRC) for the elderly alongside a new golf clubhouse with hotel accommodation containing shared social, managerial and operational space to operate and service the continued golf course use and the CCRC with all matters reserved except for access.
- 

### Decision

1. The appeal is allowed and outline planning permission is granted for replacement of existing golf clubhouse and hotel following demolition of existing to create a continuing care retirement community (CCRC) for the elderly alongside a new golf clubhouse with hotel accommodation containing shared social, managerial and operational space to operate and service the continued golf course use and the CCRC with all matters reserved except for access at Kent and Surrey Golf and Country Club, Crouch House Road, Edenbridge TN8 5LQ in accordance with the terms of the application Ref 19/02834/OUT, dated 20 September 2019 and subject to the conditions set out in the attached schedule.

### Application for Costs

2. An application for costs was made by Pacalis Group Companies, BLCP Eden 1 Ltd and BLCP Eden 2 Ltd against the decision of Sevenoaks District Council. This application is the subject of a separate Decision.

### Procedural Matters

3. The original application was made in outline with only access to be determined at this stage. All other matters were reserved for future determination. I have had regard to the existing and proposed site plans and the indicative layout of the proposed development, but have regarded all elements of these drawings as indicative apart from the details of the access.

4. The appellants have submitted a copy of a completed signed planning obligation by way of a Unilateral Undertaking (UU) under Section 106 of the Town and Country Planning Act 1990 (as amended) dated 22 June 2021. This deals with control of the use of the development (occupation), highway contributions and infrastructure including the provision of a controlled pedestrian crossing and bus stop works, communal transport for residents and staff, ecology and landscape management, public access to the golf course and facilities, public open space and contributions to public rights of way improvements. I will discuss this in more detail later in this decision.
5. During the course of the appeal, a revised National Planning Policy Framework (the Framework) was published. The parties have had an opportunity to comment on the implications of the revised Framework during the appeal process. I have dealt with the appeal accordingly.

### **Background and Main Issues**

6. The parties do not dispute that the proposal would be inappropriate development in the Green Belt as defined in the Framework. The main issues are therefore:
  - the effect of the proposal on the openness of the Green Belt; and
  - whether the harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations. If so, would this amount to the very special circumstances required to justify the proposal.

### **Reasons**

7. The appeal site lies on the western side of Crouch House Road. It comprises the clubhouse building which includes hotel accommodation and a large area of surface parking plus two of the golf course holes at the eastern end of the golf course. The clubhouse is a reasonably large, one and a half storey, L-shaped building. It lies a short distance back from Crouch House Road beyond the car parking. Adjacent to the clubhouse there is a single-storey building and a disused golf driving range which lies outside the appeal site.
8. The site is surrounded by open land, comprising the remainder of the golf course and fields and the adjacent golf driving range, with housing development on the opposite side of Crouch House Road. A railway line runs along part of its north-eastern boundary. A public right of way (PROW) crosses through the site. This limited development on the western side of the road, gives the area an open and spacious character. Its eastern boundary is adjacent to the urban confines of Edenbridge on the opposite side of Crouch House Road. The site lies entirely within the Green Belt.

#### *Openness of the Green Belt*

9. Paragraph 137 of the Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It identifies openness as an essential characteristic of the Green Belt. There is no definition of 'openness' in the Framework although it is commonly taken to mean the absence of built or otherwise urbanising development. An assessment of openness requires a consideration of the scale of the development, its locational context and both its spatial and visual implications.

10. The indicative drawings show substantial built development extending westwards from Crouch House Road onto undeveloped land. The proposed clubhouse, hotel and hub building would be two-storeys and the largest building. It would be positioned at the far western end of the site on the edge of the retained golf course. The residential units would be arranged as short terraces and blocks of flats of between 1.5 and 3 storeys, extending in a linear pattern along two internal access roads between the hub building and Crouch House Road to the east.
11. The extension of the built form into open land would inevitably cause harm to openness. The appellants consider that the harm to the openness is limited, arguing that since the appeal proposal is for outline permission, matters relating to the appearance, landscaping, layout and scale of the development are all reserved and could change through any reserved matters approval.
12. Whilst I acknowledge this point, the proposed replacement clubhouse building would have to be significantly larger than the existing in order to accommodate the range of activities proposed. It would also need to be closer to the golf course and therefore positioned away from the built up area. Moreover, a large number of residential buildings as well as access roads and parking spaces would be built on land that is currently open. Consequently, I find that the proposal would significantly reduce the spatial openness of the area.
13. The appeal site is enclosed by boundary vegetation, hedgerows and trees. The site is also bunded. These provide some limitations to views into the site. However, in order to achieve a satisfactory relationship with the existing built up area, it is inevitable that much of the proposed development would need to be positioned towards the eastern side of the site, closer to Crouch House Road from which there would be open views into the site. The presence of internal roads and buildings would have a greater visual impact on the area than the existing building on the site. This would not be sufficiently screened by either the boundary vegetation or bunding within the site. It would also be visible from the railway line and a public footpath. There would therefore be a significant adverse effect on the visual openness of the site.
14. The Council's Green Belt Assessment 2017 assessed the District's Green Belt against the five purposes of the Green Belt, as set out in the 2019 Framework. The appeal site lies within a parcel of Green Belt land of some 300 hectares. This parcel was assessed as being strongly performing Green Belt due to its importance in preventing the outward sprawl of Edenbridge into the surrounding open land and maintaining an essential gap between the built up area and the villages beyond.
15. The appeal site is around 8 hectares and accounts for under 3 per cent of this parcel of Green Belt. It is close to the built up area and some distance from other settlements. Development of this relatively small area would not significantly undermine its purpose in maintaining an essential gap, although it would represent encroachment into the countryside with the subsequent loss of openness.
16. Notwithstanding that the scheme would result in the loss of a relatively small parcel of Green Belt, I conclude that the appeal proposal would result in a significant loss of openness both visually and spatially thereby causing

significant harm to the Green Belt. Therefore, it would be contrary to the objectives of the Framework.

#### *Other considerations*

17. The Framework sets out that identified harm to the Green Belt may be weighed with any other material consideration in order to determine if there are very special circumstance which may justify inappropriate development. The appellants have referred to a number of matters, each of which I deal with below.

#### Housing Supply

18. The Council acknowledges that it cannot demonstrate a five year supply of deliverable housing sites and has confirmed that its housing policies are out of date. The statement of common ground indicates that the shortfall in delivery is 'severe'. At the hearing, it was agreed that the Council had 2.6 years supply. I certainly consider this to be a significant shortfall.
19. The Framework sets out at paragraph 11(d)(i) and Footnote 8 that where a five year supply of housing land cannot be demonstrated or delivery of housing has been substantially below the housing requirement over the previous three years, then the most important policies for determining the application should be considered out of date and planning permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed. Footnote 7 sets out that this includes land designated as Green Belt.
20. The proposed development is seeking the provision of 100 units of extra care housing. Both parties agree that this type of accommodation would fall within Class C2 of the Town and Country Planning (Use Classes) Order 1987 (UCO).
21. The PPG<sup>1</sup> advises that housing provided for older people, including residential institutions in Class C2, should be counted towards housing land supply. It goes on to explain at paragraph 16a<sup>2</sup> that housing provided for older people should be counted against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households.
22. The Council in its Housing Land Supply update<sup>3</sup> (HLS report) sets out that C2 units are expressed in terms of bedspaces. It utilises a methodology for calculating the equivalent number of C3 housing units from C2 units based on an average household occupancy of 1.87 adults.
23. Whilst this approach is noted, I find that the nature of the proposed units would be more akin to a small dwelling with a separate kitchen and living area and mostly two bedrooms. Notwithstanding that the proposal would fall within Class C2, given that each unit would be capable of accommodating a small household rather than just a single occupant occupying a room within a more traditional residential care home setting, I consider that it would be

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<sup>1</sup> Paragraph: 035 Reference ID: 68-035-20190722

<sup>2</sup> Paragraph: 016a Reference ID: 63-016a-20190626

<sup>3</sup> Sevenoaks District Council, Housing Land Supply Update, 27<sup>th</sup> September 2019 (Update to take account of C2 supply)

reasonable to count this as a dwelling rather than on the basis of bedspaces. For this reason, it seems to me that the proposed development would contribute 100 residential units, albeit of a specialist nature, to the Council's housing land supply.

24. Even if I am wrong and the contribution to housing should be adjusted to be counted as bedspaces, the scheme would contribute an equivalent of at least 53 housing units based on the provision of 100 bedspaces. However, it seems to me that since the majority of units provide two bedrooms, in reality this figure could be higher and its overall contribution to housing supply greater.
25. Data within the SHMA shows that nearly 73 per cent of older person households within the District are relatively likely to live in outright owned accommodation. These people will often have significant equity in their homes which may mean that market solutions will also be required to meet their needs. Amongst these households, there is a high proportion of under-occupancy with nearly 59 per cent of such households having at least 2 spare bedrooms.
26. The emerging Local Plan, whilst carrying very limited weight, recognises that encouraging older people to downsize can play an important role in releasing larger homes for growing families. Whilst not all older person households would either need to or wish to move into a retirement village such as proposed here, there is evidence that such accommodation does meet a need for some. The provision of specialist housing more suited to the needs of this part of the population is likely to encourage them to move, freeing up housing stock and would make a valuable contribution to overall housing supply.
27. The Council acknowledges its shortage of housing land. However, it considers that the provision of housing would not outweigh the overriding need to protect the Green Belt from harmful development in accordance with paragraph 11(d)(i) of the Framework. Whilst I accept that on its own, the provision of general housing would not be sufficient to outweigh the harm to the Green Belt. I do nevertheless find that the contribution to housing supply including the freeing up of housing stock, are factors that together carry substantial weight in the balance.

#### Housing Needs of Older People

28. The Framework sets out at paragraph 61 that local planning authorities should undertake a local housing needs assessment, conducted using the standard method in national planning guidance. Paragraph 62 goes on to require that it assess the housing needs of different groups including for older people.
29. The Planning Practice Guidance<sup>4</sup> (PPG) sets out that the need to provide housing for older people is critical in view of the rising numbers in the overall population. Furthermore, it considers that older people should be offered a better choice of accommodation to suit their changing needs in order that they can live independently for longer and feel connected to their communities. Extra care housing is once form of housing for older people which is recognised by the Government as providing such benefits.
30. The Council produced a Strategic Housing Market Assessment (SHMA) in 2015 which formed part of its evidence base for the Council's emerging Local Plan.

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<sup>4</sup> Paragraph: 001 Reference ID: 63-001-20190626

The SHMA predicts an increase in those aged over 65 within the District by 48 per cent from 2013 to 2033, with particularly strong growth expected in those aged over 75, driven by improving life expectancy. With an aging population, the Council accepts that there is a need for the type of housing proposed. However, it disputes that the scale and location of the proposed development are able to meet the need appropriately.

31. The SHMA makes an assessment of overall housing need, including the need for different types of home, particularly for a growing older population. As part of its assessment, the SHMA sets out the need for specialist housing and accommodation for older persons. It places specialist housing including sheltered and extra care housing for older persons into Class C3 of the UCO. It makes a separate assessment of the need for care home bedspaces, considered to fall within Class C2.
32. The SHMA estimated a requirement for an additional 1,319 specialist housing units in the District between 2013 and 2033. This equates to an annual need of 66 dwellings. This is based on existing provision of 102 affordable extra care units and 1,490 sheltered housing units, both market and affordable.
33. Notwithstanding the inconsistency between the use classes applied to this type of housing, as extra care housing, I consider the scheme would contribute to the need for 1,319 specialist housing units as set out in the SHMA, rather than making a contribution to the need for C2 units, which is based on bedspaces. In providing 100 extra care units it would make a sizeable contribution to the overall need set out within the SHMA.
34. Although the SHMA treats extra care housing as Class C3, from the evidence submitted, the Council has calculated the delivery of extra care housing as falling within Class C2. The Council undertook a review of schemes delivering C2 accommodation as set out within its HLS report. This provided details of schemes with planning permission falling within Class C2. A number of these were providing traditional care homes but there is evidence that several were providing extra care accommodation.
35. Based on analysis of these approved schemes and the figures and evidence put forward by the appellants, there appears to have been provision of around 189 extra care unit completions between 2015 and 2019 and a further 67 extra care units with planning permission. These figures have not been disputed.
36. No evidence has been put to me to demonstrate that there have been any further schemes permitted within the District since 2019. On this basis, and using the requirement set out in the SHMA, around 256 units of extra care accommodation have or will be provided. Part of this provision included a scheme at White Oak Court, Sycamore Drive<sup>5</sup> was completed for a change of use of 51 units from sheltered housing to extra care. These 51 units existed prior to the SHMA have been undertaken and would have counted against the existing supply. Therefore, whilst they count towards the supply of extra care units they would not have contributed to a net gain in the overall number of specialist housing within Sevenoaks.

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<sup>5</sup> Council Ref: SE/18/00568/FUL

37. By my calculation, the overall contribution to the 1,319 figure provided by extra care housing would amount to just over 200 units. This equates to around 15 per cent of the overall SHMA requirement for specialist housing to 2033. With the addition of a further 100 units, this would bring the figure to around 23 per cent at around halfway into the SHMA period.
38. Since I have not been provided with any details of how many Class C3 sheltered housing units have been provided, it is not possible to reach a firm conclusion as to what the overall level of delivery has been against the annual need identified within the SHMA and the extent of any shortfall or oversupply. Even in the absence of confirmed numbers of sheltered accommodation delivery, the delivery of less than a quarter of the overall need for specialist housing as extra care housing (including the appeal scheme), does not suggest there has been or would be an oversupply of such housing.
39. The Council submitted a Market Position Statement 2021-26<sup>6</sup> (MPS) for accommodation with care and support. This set out the requirement for extra care housing specifically for older persons, referred to as Housing with Care, for all local authorities covered by Kent County Council. The Council confirmed that the MPS was based on 2017 population forecasts and used a model endorsed by the Housing Learning and Information Network (Housing LIN). It also covered both market and affordable requirements although it did not split the need into these types.
40. The MPS sets out that within Sevenoaks there is a shortfall of 93 extra care units to 2026 and on the basis that this demand would be met, a further 39 extra care units would be required between 2026 and 2031. A total of 132 additional units would be needed. Essentially, by the end of 2031, it suggests that Sevenoaks would require a total of 253 extra care units. Based on the MPS, the appeal scheme would meet the entire need for the District to 2026 in a single location.
41. However, I find it hard to reconcile the MPS figure with the evidence put forward within the SHMA and the HLS report in relation to both demand and supply. By my calculation, the MPS indicates that as of March 2021, Sevenoaks was assessed to have 121 units either currently available or in the 'pipeline'. However, the SHMA in 2015 identified that there were 102 existing extra care units and the HLS report, indicates that some 256 units have either been implemented or have permission. This would bring combined existing and pipeline supply to around 360 units and significantly higher than the 121 identified in the MPS.
42. A need of some 66 units per year as indicated in the SHMA would equate to 660 units over an equivalent ten year period. This would be significantly more than the 132 units predicted to be needed during the MPS ten year period of 2021-2031. Even taking account that some of the 660 units needed would be traditional sheltered accommodation, I nevertheless find that the disparity between these assessments of need would be significant.
43. I recognise that the MPS is a more up-to-date document. However, I have no information as to how the figures have been calculated to inform both the existing and pipeline supply position within the MPS. It is also not clear what

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<sup>6</sup> Kent County Council, Accommodation with Care & Support Adult Social Care Commissioning Market Position Statement 2021-26 (Last updated 04/2021)



the methodology has been to determine future demand and the extent to which this has been informed by local assumptions for Sevenoaks District. I have no evidence of the extent to which this has been subject to scrutiny. For these reasons, I can only give this limited weight.

44. The SHMA figures were based on data and a toolkit from the Housing LIN. It used the 2012-based sub-national population projections. The appellants have indicated that this would have been the SHOP@ tool (Strategic Housing for Older People Analysis Tool). This is a tool for forecasting the housing and care needs of older people. The Housing LIN toolkit indicated that there should be around 170 units of specialised accommodation (other than registered care home places) per thousand people aged over 75 years.
45. The appellants have asserted that the figure of 170 specialist housing units per 1,000 of the population is split into 12.5 per cent sheltered housing, 2.5 per cent enhanced sheltered and 2 per cent extra care accommodation. Enhanced sheltered and extra care accommodation are similar and it was accepted by the Council that it would be reasonable to count these together. In combination, it was agreed that the need for this type of accommodation would represent 4.5 per cent of the population aged over 75 years.
46. Using this toolkit, the appellants have made an alternative assessment of demand for extra care housing. This is based on the mid-2019 population projections<sup>7</sup>, taking a percentage of the population of over 75s. This gives an existing need of 555 units of extra care and enhanced sheltered housing increasing to 841 units by 2033. The current supply, both existing and in the pipeline, of around 360 units of this type falls significantly short of the 555 units needed.
47. The appellants have argued that this figure should be adjusted to 8 per cent, thereby taking into account those aged between 65 and 74 years as well as aspirations and social policy. I look at each of these in turn.
48. Whilst the accommodation would be available to anyone over the age of 55 who meets the eligibility criteria which includes amongst other things a need for care, physical frailty and social isolation, based on evidence from research and surveys of other care homes, the need is expected to be from those in their late 70s and 80s, with the average age of residents around 82 years. Therefore, whilst I accept that there will be people from within the lower age bracket who will both qualify for and choose this housing option, I have no figure to quantify this. I nevertheless agree that the figure of need would be higher to take into account this age group.
49. In terms of social policy and aspirations, it seems to me that with increased provision of extra care housing there could be an uplift in demand due to a shift from more traditional care home accommodation. This is borne out in the MPS, the SHMA and the Council's 2017 Local Housing Needs Study. On this basis, I agree that the appellants' figures based on 4.5 per cent may be conservative but I am unable to reach any firm conclusions on this.
50. Due to differences in methodologies and assumptions and recognising that the SHMA is now some years old, it is not possible to reach a definitive position on overall need. The Council advised at the Hearing that it has commissioned

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<sup>7</sup> ONS Mid-2019: April 2020 local authority district codes – Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland

work to look at older person's housing needs within the District. However, this is not yet available. Nevertheless, I find that, on balance, based on existing supply including that in the pipeline, the population and its projected increase within older year groups, there is currently an existing and significant shortfall and a growing need for this type of housing. The proposed development would make a significant contribution towards meeting this requirement.

51. The Council's draft Local Plan<sup>8</sup>, following an unsuccessful Judicial Review of the Inspector's conclusions that the plan should not be adopted, holds no weight in decision making. However, it recognises that a high proportion of the District's housing requirement will be for specialist accommodation for older people, quoting the housing need figures from the SHMA. Whilst the Council's intentions for planning for older persons housing as set out within the draft Local Plan are noted, there are currently no policies in place that would specifically secure this type of housing.
52. With an aging population within the District and based on the evidence of need, I have no reason to dispute that the proposal would meet the housing needs of older people. However, I turn now to consider whether this accommodation is being provided in the right place.
53. The draft Local Plan proposed that older person housing is concentrated in the three main strategic settlements in Sevenoaks, Edenbridge and Swanley. This is to ensure that older persons' housing is distributed spatially and sustainably so that not only can it meet the need identified, but also be located where older persons can remain close to their existing connections, family and community. Whilst not adopted policy, this approach to my mind, seems reasonable.
54. None of the submitted evidence provides any analysis of need below District level. However, as one of the larger settlements within the District, it would be reasonable to expect that a proportion of the overall need would arise within Edenbridge.
55. The Council has referred to a number of elderly care accommodation developments within the urban confines of Edenbridge quoting figures in the region of 240 units. However, no extra care housing has been provided within Edenbridge and its parish. Furthermore, with the exception of Edenbridge Manor Care Home, which is a traditional care home providing 85 units, the other developments date back to 2012 or earlier. They therefore pre-date the SHMA assessment and the need set out therein is evidently on top of this existing provision.
56. There is no evidence to suggest that there is any extra care housing serving Edenbridge. The schemes for this type of housing to which I have been referred are for developments in other settlements, including Sevenoaks and Swanley. The proposed development would make a contribution to different types of specialist housing designed to meet the diverse needs of older people serving Edenbridge. Whilst it would be a sizeable development, in serving the third largest settlement within the District it would meet a local need.
57. The appeal site was submitted under the call for sites in 2017 for housing development. It was assessed as being unsuitable due to the loss of an

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<sup>8</sup> Sevenoaks District Local Plan, Proposed Submission Version Regulation 19 Consultation December 2018

outdoor sports facility and for the majority of the site being isolated from the main town. In particular that the site was not in walking distance of public transport and existing services and facilities, thereby trips to these facilities would be reliant on the car.

58. The Sevenoaks Allocations and Development Management Plan 2015 (ADMP) identified two possible sites for mixed use development including housing for older people and a further six housing sites identified as suitable for housing specifically designed for older people. These were considered too small by the appellants for what they were proposing. From the evidence submitted, of those developed none have delivered any such housing and a number remain undeveloped.
59. The Council has not specifically stated the proposed development should be delivered on one of the allocated sites although it considers sites within urban confines should be considered. It also maintains the position set out within the ADMP that it can meet its housing targets without the need to release land in the Green Belt and by focusing development within the existing urban and village locations of the District. However, at the Hearing I was told that less than 1,000 houses would be delivered on allocated sites within existing urban areas on non-Green Belt land which suggests that land within the Green Belt would need to be considered.
60. In such circumstances, the appellants have argued that they are unable to compete with general housing developers for suitable larger sites as required for their proposal. No viability assessment has been put to me to substantiate that claim. Nevertheless, I accept that there is a minimum number of units and site area that would be likely to be required to support the retirement village concept and the viable provision of shared on-site facilities for residents. I also acknowledge that the availability of sites is considerably constrained by both the Green Belt and Area of Outstanding Natural Beauty designations that cover 93 per cent and 60 per cent respectively of the District.
61. I note that an Inspector in allowing an appeal<sup>9</sup> for a development of 79 extra care unit at Land to the rear of 237-259 London Road, West Malling within neighbouring Tonbridge & Malling Borough Council where Green Belt designations likewise limited the choice of sites, reached a very similar conclusion.
62. The SHMA suggests that the provision of specialist housing is split roughly 60:40 between market and affordable tenures. The appeal scheme would deliver market housing and the Council has confirmed that it would not be liable for affordable housing contributions.
63. Consequently, I conclude that the proposed development would make a significant contribution to meeting the overall need for specialist housing within the District for which the current development plan does not make adequate provision for and for which the emerging local plan, whilst supportive, would be unlikely to deliver for some time yet.

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<sup>9</sup> APP/H2265/W/18/3202040

### Locational factors

64. The SHMA recommends that the Council identifies sites in accessible locations for specialist housing. The proposed extra care accommodation would be on the edge of the urban area, some 1.2 kilometres from the town centre. For less mobile residents, it would not be within easy reach of services and facilities which would be around a 15 to 20 minute walk from the site. Given the age of anticipated future occupants, this would be neither convenient nor provide a realistic option for many of them. Whilst there is a bus stop opposite the site, the service is not considered to be sufficiently frequent to provide a satisfactory means of access to the town centre.
65. In view of the anticipated age of the future occupants, the appellants have explained that the operational model is based upon bringing services and facilities to the residents. This would be supplemented by a communal transport service for residents to enable them to access local services and facilities off-site with a buggy transport system operating within the site between the residential units and the hub building. Details and the provision of this would be confirmed through a Communal Transport Plan which would be secured through the submitted UU.
66. Whilst there is nothing to prevent future residents from owning and using a car, in view of their advanced age and the arrangements for access to services and facilities, it seems to me that future residents would not be overly reliant on the use of the private car, usage of which is likely to be modest.
67. There is an existing golf course and hotel on the site, which when operational, would be accessed by staff, club members and hotel guests. The appeal scheme would increase the number of staff and the hotel capacity on site with subsequent increases in trips to and from the site. In terms of staff coming to work at the site, the appellants argue this is no different to people working at industrial premises on the edge of town. Furthermore, whilst the walking distance may not be suitable for future residents, this does not mean that younger or more mobile people working or visiting the site would not be able to walk or cycle to it. The site is, after all, on the edge of the settlement, linked to it by footpaths and not entirely disconnected from it.
68. Overall, I conclude that the appeal site is not in a highly sustainable location and there would inevitably be some increase in traffic to and from the site, including trips by private cars. However, with alternative transport means for future residents as well as taking into account the existing use of the site, this only carries limited weight against the proposal. In coming to this view, I am also mindful that locational factors were not identified by the Council as a reason for refusal.

### Health and Well-Being Benefits

69. There is a body of evidence to support the provision of housing for older people, such as extra care housing, which allows for and enables social contact and interaction, helping to address issues of loneliness and isolation that can occur. To be successful in this, such developments need to be situated in the community, close to local amenities and facilities, to ensure that people within the scheme can stay independent and involved members of that community for as long as possible.

70. The entire site would include a mix of uses with associated comings and goings and activities. Future occupants would have the benefit of living as a community with associated opportunities for social interaction with each other and others attending at the hub building. This would help tackle issues of isolation. Whilst some concerns about opportunities for social interactions have been raised in respect of the layout, this could be addressed through the reserved matters.
71. The appellants have provided evidence of the beneficial impact on public health budgets as future residents would have on-site care and support services. Moreover, with future occupants being able to retain their independence with the care they need, the scheme would promote improved well-being.
72. I find I have no reasons to disagree with this position and I agree that there are likely to be overall benefits to health and well-being from this proposal. However, because the scheme is a distance from off-site local services and facilities which may limit opportunities for interactions beyond the immediate community, I reduce the weight accorded to this and therefore give it moderate weight.
73. The Council has raised a concern about the impact of this scale of facility on existing local infrastructure, such as health care provision. Whilst this is noted, the intention is to draw people mainly from the local area who would already be registered for such services. Furthermore, with improved well-being and the provision of on-site consulting rooms for visiting health care practitioners to administer treatments, it is not expected to give rise to significant additional pressure on existing services.

#### Safeguarding the Long Term Future of the Existing Golf Course and Use

74. The existing golf course on the site is currently closed. It is located within an area where there are a significant number of golf courses. Some of these have closed down which the appellants attribute to an issue of oversupply as well as reduced demand for such facilities from the population. In these circumstances, the appellants have indicated that the golf club will not reopen at the end of the current pandemic.
75. The loss of an outdoor sports facility was one of the reasons for not including the site within the site allocations for the local plan. The appellants have argued that the proposal would enable the retention of the golf course, for which there is local support, and there would be no loss of an outdoor sports facility.
76. The appellants contend that the appeal golf course is well located to the settlement, providing an opportunity for combined trips and access to employees. The care community would allow for the diversification of the hotel / golf course use with shared facilities and services. This would ensure the ongoing viability and commerciality of the golf course, would enable the maintenance of the land and provide a leisure facility within an accessible location.
77. It has been suggested that the existing golf course is not financially viable. However, I have been provided with no evidence of income and expenditure or falling membership numbers to demonstrate that there is no longer a need

or viable operating model for the golf course to continue. Whilst I accept that the existing facilities are in need of modernisation and that works to them would improve the appearance of the area along Crouch House Road, it has also not been demonstrated that refurbishment of the existing facilities would be prohibitive. In the absence of this and whilst I understand the appellants' desire to improve the golf course facilities, I can only give this very limited weight.

78. The appellants have also highlighted that with the existing golf course closed, there are problems with unauthorised access to the land with people using motorised vehicles and causing damage to the grounds. In bringing the site back into active use with associated maintenance and supervision, this type of anti-social behaviour could be more effectively addressed. Whilst security and fencing could help solve the problem, with public footpaths crossing the site, this would be a difficult and expensive solution.
79. I appreciate that it would be easier to tackle such issues were the golf course to be operational. However, as it has not been demonstrated that the golf course could not reopen without the proposed development, I attribute very limited weight to this matter.

#### Economic Benefits

80. At the time of the planning application some 14 full-time equivalent staff were employed at the site. The appellants consider the combined use would result in more than 100 individual positions extending to between 130 to 150 people employed with part time working and seasonal working. This would be equivalent to 110 full time staff. In addition, associated economic benefits with serving the residential and leisure use is estimated to be some 30 to 40 jobs through suppliers and delivery of services.
81. Whilst these figures may vary a little, it seems inevitable that the proposed use which includes an expanded operation and new uses would generate a considerable amount of additional employment over and above the existing with a knock-on effect locally. During the construction period, the development would create employment on site as well as those working on the site contributing to the local economy.
82. The existing hotel accommodation provided within the golf clubhouse is not of a high standard, with poor disabled access. There is no evidence of any deliberate neglect of the hotel. The scheme would provide an enlarged hotel with better facilities which may give rise to some additional tourism and associated economic benefits over the existing hotel. However, it seems to me that a new hotel could be provided in place of the existing. As such I find it would essentially be replacing an existing hotel, albeit with a larger one, this carries limited weight in terms of justifying the proposal.
83. When taken together, the scheme would provide additional employment and a number of associated economic benefits. Overall, these are positive benefits of the scheme to which, in combination, I give moderate weight.

#### Open Space

84. As part of the proposal new publicly accessible open space of 0.5 hectares would be created and secured through the UU. Whilst this would contribute to health, well-being and provide space for the community, it would also be on

an area of existing open land that was part of the golf course. Furthermore, it seems to me that this new area of open space would largely meet the needs of the proposed development and its future occupants, employees and visitors. Consequently, I find this delivers very modest public benefits and therefore carries very limited weight.

#### Public Footpath

85. The scheme includes upgrades to the PROW both within the appeal site and wider site. This would make it more accessible by all, with improved surface material to enable wheelchair users to use it. However, this upgrade to the surface of the PROW is largely to accommodate the increased use of the footpath arising from the proposal. As such, whilst there would be some benefit from this, I only give this very limited weight.

#### New pedestrian crossing

86. The scheme includes the provision of a controlled pedestrian crossing, traffic calming measures and improvements to the nearby bus stops on Crouch House Road. The road is subject to a 30 mph speed limit, however, evidence indicates that these are regularly and significantly exceeded. The local highway authority has supported the highway improvements in terms of traffic calming and the provision of a pedestrian crossing. The proposed crossing would largely benefit future occupants and users of the proposed development in providing safe pedestrian access to it. Nevertheless, in helping to reduce speeds along this road there would be a wider benefit to the community. I therefore give this moderate weight.

#### Facilities for wider community

87. The proposed facilities would be open to the wider community providing bookable space for community meetings and weddings. From what I heard, there are a number of existing community facilities within Edenbridge and there is no identified need for additional community facilities. Whilst I do not have full details of these and whether they would be directly comparable with what the appeal scheme is offering, it nonetheless appears that Edenbridge is already relatively well-served in this regard. It seems to me that the provision of these facilities would largely provide a benefit to the owners of the facilities. Nevertheless, a small public benefit would be derived from having these facilities as an option to what is already available. I give this very limited weight.

#### Planning Obligation

88. The signed Section 106 Agreement makes provision for appropriate control of the use and its occupation as well as provision for communal transport, landscape and ecology management, open space, highway and PROW improvements. The full details of the highway improvements would be secured by way of a Section 278 Agreement under the Highways Act 1980. I am satisfied that each sought obligation meets the three tests set out in paragraph 57 of the Framework for planning obligations. As a result, I have taken the completed planning obligation into account.

### Other Issues

89. A question has been raised about the cost of the accommodation and whether it would be affordable. The scheme is not proposing the provision of affordable units and would provide market extra care housing. The appellants have indicated these would be priced according to local market conditions. The sale price of these market units is not a matter before me.
90. Concerns have been raised about the effect of the proposal on the local area both during and after its construction. There may be some disruption during construction works, however, a condition requiring a construction traffic plan to be agreed prior to works commencing would alleviate this. The highway authority has assessed the trip generation from the proposed development as submitted by the appellants. They have not disagreed with this nor indicated that it would give rise to an unacceptable increase in traffic to the detriment of highway safety.
91. Several interested parties have raised concerns about the capacity of the local sewage network to accommodate the proposed increase in dwellings and other uses on the site. The imposition of a condition requiring details to ensure this is satisfactory and implemented accordingly would secure this.
92. The appellants submitted ecological appraisals and impact assessments<sup>10</sup> which demonstrated that the footprint of the proposed development would be unlikely to significantly impact protected or notable species. However, as the proposal is in outline and the landscape and layout is indicative, further consideration of these matters would be considered under any reserved matters application.
93. The replacement fairways for those lost through the proposed development would be likely to give rise to some harm due to vegetation clearance and the protected and priority species known to be there through the appellants' survey. The Council has confirmed that any vegetation clearance to change the layout of the existing golf course would not require planning approval. If the correct licences and appropriate mitigation were to be implemented, the owners of the site could clear vegetation on site irrespective of this appeal scheme.
94. The appellants, through the UU, would provide an Ecological and Landscape Management Plan to detail the management of the property and its operations. This would provide for the protection, mitigation and enhancement of the biodiversity and ecology of the appeal site and its surrounds.

### *The Green Belt Balance*

95. Paragraph 147 of the Framework makes it clear that inappropriate development is, by definition, harmful to the Green Belt, and should not be approved except in very special circumstances. I have concluded that the proposal would be inappropriate development and would therefore, by definition, be harmful to the Green Belt. I have also found that it would cause significant harm to the openness of the Green Belt. These are matters to which I give substantial weight as required by paragraph 148 of the Framework.

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<sup>10</sup> The Ecology Go-op, Preliminary Ecological Appraisal, 4 March 2019 and The Ecology Co-Op, Ecological Impact Assessment, 9 September 2019



96. The proposal would make a contribution to general housing supply within the District of 100 units including through the release of family housing to the market. In view of the Council's significant shortfall in housing supply, I accord substantial weight to this.
97. The scheme would provide 100 units of extra care housing for older people. This would address an existing shortfall and contribute to meeting a critical need. Due to its location on the edge of the settlement with limited direct access to the existing services and facilities, I reduce the weight attributed to this provision. I nevertheless consider this carries significant weight.
98. Notwithstanding the location of the development, I find future residents would benefit from improved well-being and health. The proposed scheme would also provide a number of economic benefits in terms of job creation and support for local services. In addition, the highway improvements would provide some wider benefits in terms of highway safety along Crouch House Road. I accord each of these factors moderate weight.
99. Although of benefit to the appearance and security of the area, it has not been satisfactorily demonstrated that the safeguarding and improvements to the golf club and its facilities are reliant on the wider scheme. This therefore carries very limited weight. The provision of facilities to the wider community are also matters to which I accord very limited weight.
100. The provision of open space and improvements to the PROW would be largely of benefit to the proposed development and its occupants and users. I therefore accord these benefits very limited weight.
101. The proposal would not be in a highly sustainable location. However, I have found that this carries limited weight against the scheme. Taking this into account, I nevertheless find that the other considerations cumulatively clearly outweigh the harm to the Green Belt I have identified. Consequently, the very special circumstances necessary to justify the development exist.
102. The demonstration of very special circumstances accords with national policy. Any conflict with Policies LO1 and LO8 of the Sevenoaks Core Strategy 2011 (CS) which together seek to protect and maintain the extent of Green Belt and other identified conflicts with the development plan are outweighed by other material considerations.

### **Conditions**

103. The Council has proposed a number of conditions should the appeal be allowed. I have considered these and imposed them where they meet the tests set out in Paragraph 56 of the Framework, amending where necessary for the sake of simplicity, clarity and precision.
104. In addition to the standard conditions relating to the submission of reserved matters it is necessary to identify the plans to which the decision relates, but only insofar as they relate to reserved matters for consideration at this stage, as this provides certainty. Conditions restricting the number of units, quantum of floorspace and height of each element of the proposed development are necessary to control the extent of the development. A condition requiring the extra care units to be constructed to accessible and adaptable standards is reasonable in view of the proposed future occupants of the development.

105. To protect trees on site, local amenity and highway safety, conditions securing a tree protection scheme and construction traffic management plan are necessary.
106. Conditions securing an Order for the realignment of the PROW and certification for its provision and for its surface, are both necessary and reasonable to ensure this work is carried out as approved and to an appropriate standard. A condition preventing any planting within 1 metre of its edge is necessary in the interests of public safety. I have however omitted a condition preventing disturbance of the surface as the Council confirmed this is covered by other legislation.
107. I have imposed conditions requiring the details and implementation of the disposal of foul and surface water sewage and a sustainable surface water drainage scheme and verification of this in the interests of the safe and suitable operation of the site. Conditions requiring investigation of potential contamination and its remediation are necessary to ensure the site is safe for the use proposed.
108. In the interests of protecting ecology and enhancing biodiversity, conditions to secure works to be carried out in accordance with the submitted ecology assessments and to provide for biodiversity enhancements are necessary and reasonable.
109. I have imposed conditions requiring details of the provision of electric vehicle charging sockets, car parking for a car share/club and a travel plans in order to deliver sustainable travel. A condition requiring details and implementation in accordance with sustainable design, construction and energy efficiency measures is reasonable in the interests of reducing the environmental impact of the development and tackling climate change. However, I have amended the targets to accord with the requirements of adopted Policy SP2 of the CS.
110. Conditions requiring details of materials, hard and soft landscaping, lighting scheme and means of enclosure are necessary and reasonable in the interests of the character and appearance of the development. Exceptionally, a condition restricting permitted development for means of enclosure is reasonable for the same reason.
111. I have not imposed a condition seeking archaeological investigation as the site is not located within an area of archaeological potential.

### **Conclusion**

112. I have concluded above that, for this appeal, very special circumstances exist to justify inappropriate development in the Green Belt. My findings on other matters do not lead me to reach a different conclusion. Consequently, I conclude overall that the proposal would comply with the relevant provisions of the Framework and the development plan when considered as a whole. For the reasons given above, and having considered all other matters raised, I conclude that the appeal should be allowed.

*Rachael Pipkin*

INSPECTOR

## Schedule of Conditions

- 1) Details of the appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the Local Planning Authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the Local Planning Authority not later than 3 years from the date of this permission.

The development hereby permitted shall take place no later than 2 years from the date of approval of the last of the reserved matters to be approved.

- 3) The development hereby permitted shall be carried out in accordance with the following approved plans (noting the indicative and illustrative nature of many the plans, ahead of detailed design work and submission in reserved matters):

- P01 Block Plan
- P02 Proposed Site Layout 1 of 2
- P03 Proposed Site Layout 2 of 2
- P04 Proposed Golf Course Layout
- P05 Proposed Site Section A A
- P06 Proposed Site Section B B
- P07 Proposed Site Section C C
- P08 Proposed Site Section D D
- P09 Proposed Site Sectional E to F
- P15 Location plan
- P20 to P45 and P60 - P45
- P50 Proposed Club and Care Hub 1 of 2
- P51 Proposed Club and Care Hub 2 of 2
- Existing impermeable areas 19033-D03A
- Proposed impermeable areas 19033-D04A
- 19033-GA-01-C Access & Traffic Calming
- 254KSGLM02 Landscape Masterplan
- 768 - P70 Indicative Building heights
- Drainage Strategy layout Sheet 1 of 2 19033-D01-G
- Drainage Strategy layout Sheet 2 of 2 19033-D02-F

- 4) No more than 100 individual accommodation/extra care units shall be built on the site within the Continuing Care Retirement Community in the C2 Use Class with a maximum internal floor area of 13,145 square metres and shall have a maximum of two full storeys with some having accommodation in the roof space areas.
- 5) The community hub and golf clubhouse, with hotel accommodation, will have a maximum internal floor area of 3,470 square metres and shall have a maximum of two storeys.
- 6) In terms of ancillary buildings – cycle storage, buggy store, refuse stores, golf course serving buildings – there will be a maximum internal floor area of 480 square metres and no more than 55 square metres maximum internal floor

area in terms of small clubhouse/hub gathering and activity building for use by the CCRC.

- 7) All of the extra care units will comply, as a minimum, with the technical standard M4(2) for accessible and adaptable dwellings as set out in the Building Regulations.
- 8) No site clearance works, or development shall take place until a tree protection scheme has been submitted to and approved in writing by the Local Planning Authority. The site clearance works, and development shall be carried out in accordance with the approved tree protection scheme.
- 9) No development shall commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Construction Traffic Management Plan shall be implemented in accordance with the approved details.
- 10) No development shall take place over the alignment of Public Footpath SR600 until an Order for its permanent diversion has been made and confirmed, and the diverted route has been fully provided and certified.
- 11) The public rights of way within the development site shall be surfaced by the developer to a specification to be submitted to and agreed in writing by the Local Planning Authority prior to commencement. This shall be implemented in accordance with the approved details before any of the proposed units are occupied or the clubhouse/hotel/hub building is brought into use. It will thereafter be maintained.
- 12) No hedging or shrubs should be planted within 1 metre of the edge of any public rights of way on the site.
- 13) No development shall be commenced until information and details of the phasing of the development ensuring it aligns with any required reinforcing of the sewage network to ensure adequate waste capacity is available.

Construction of the development shall not commence until details of the proposed means of foul sewage and surface water sewage disposal have been submitted to and approved in writing by the Local Planning Authority. Such details once approved shall be fully implemented and not altered without the prior written permission of the Local Planning Authority.

- 14) Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the Local Planning Authority. The detailed drainage scheme will be based upon the principles from Drainage Strategy Sheets (Sheet 1: 19033, D01, G and Sheet 2: 19033, D02, F). The discharge rate from the site shall not exceed the agreed discharge rate of 40.1 l/s ( $Q_{bar}$  for all storm events) and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site. The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

- 15) No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate the suitable modelled operation of the drainage system where the system constructed is different to that approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.
- 16) Before the development commences, an investigation and risk assessment of land contamination shall be completed by competent persons and a report of the findings submitted to and approved in writing by the Local Planning Authority. This shall include an appropriate survey of the nature and extent of any contamination affecting the site, and an assessment of the potential risks to human health, controlled waters, property and ecological systems. Where unacceptable risks are identified, an appropriate scheme of remediation to make the site suitable for the intended use must also be submitted to and approved in writing by the Local Planning Authority.
- 17) Where remediation is necessary in relation to condition 16, and unless otherwise agreed in writing by the Local Planning Authority, none of the development shall be occupied until the approved scheme of remediation has been completed, and a verification report demonstrating the effectiveness of the remediation carried out has been submitted to and approved in writing by the Local Planning Authority. The verification report shall include a description of the works undertaken and a photographic record where appropriate, the results of any additional monitoring or sampling, evidence that any imported soil is from a suitable source, and copies of relevant waste documentation for any contaminated material removed from the site.

In the event that, contamination is found at any time when carrying out the approved development, that was not previously identified, it must be reported immediately to the Local Planning Authority. An appropriate investigation and risk assessment must be undertaken, and where remediation is necessary, a remediation scheme must be prepared by competent persons and submitted to the Local Planning Authority for approval. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to and approved in writing by the Local Planning Authority.

- 18) The development shall be implemented in accordance with the recommendations, mitigations and enhancement features detailed in the Ecological Impact Assessment dated 23 December 2019 and Preliminary Ecological Appraisal dated 4 March 2019 by the Ecology Cooperation Ltd. Prior to the commencement of development updated versions (including updated appropriate surveys as required) will be submitted to and approved in writing by the Local Planning Authority. Such amended versions will take into account any layout and landscaping detailed design submitted as part of any reserved matters application.
- 19) Prior to the commencement of development, details of measures and a programme of works to enhance biodiversity shall be submitted to and approved in writing by the Local Planning Authority and the works shall be carried out in accordance with the approved details and the programme of works. The required details shall include the following:
- Native tree and hedgerow planting,
  - Wildflower meadow seeding,
  - Bat and bird boxes, and
  - Lighting scheme that avoids light spill onto the boundary features and retained mature trees.
- 20) Prior to first occupation of the development hereby approved, a scheme to provide electrical charging sockets, for the charging of electric vehicles shall be submitted to and approved in writing by the Local Planning Authority. These details shall include number, type and location. The sockets shall be provided and installed in accordance with the approved details prior to the first occupation of any part of the development.
- 21) Prior to first occupation of the development hereby approved, details of car parking facilities for car share/car club vehicles and a programme of works, shall be submitted to and approved in writing by the Local Planning Authority. The car parking facilities shall be provided in accordance with the approved details and the programme of works, shall be for the exclusive use of electric vehicles, and shall be retained for such use, at all times.
- 22) Prior to first occupation of the development hereby approved, a travel plan shall be submitted to and approved in writing by the Local Planning Authority. The measures within the approved travel plan shall be implemented in accordance with the approved details and programme. In addition to the details set out in the Framework Travel Plan details within Transport Assessment 19-TP0015 v1r1 by Neil Brant Consulting September 2019. The plan shall contain the following information:
- Measures to promote sustainable travel, including sustainable transport incentives to residents: and
  - Travel plan implementation and monitoring schedule.
- 23) The development hereby approved shall not be commenced until details of the implementation and design of the matters contained in the Sustainable Design & Construction Statement & Renewable Energy Assessment P2082-B20-REP-MEP-002 by Box Twenty dated September 2019 have been submitted to and

approved in writing by the Local Planning Authority. Such measures shall include:

- That the Club and Care Hub Building achieves BREEAM Excellent rating.
- At least a 10% reduction in total carbon emissions through on-site installation and implementation of decentralised, renewable or low-carbon energy sources

The development shall be carried out in accordance with the approved details.

- 24) No development above ground floor slab level of any part of the development hereby permitted shall take place until samples/details of the materials to be used in the external surfaces of the development have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved materials.
- 25) No development above ground floor slab level of any part of the development hereby permitted shall take place until details of the hard and soft landscaping, finished levels or contours, car parking layouts, vehicle and pedestrian access and circulation areas, hard surfacing materials and all means of enclosure have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details prior to the first occupation of the development and shall thereafter be retained for the lifetime of the development.
- 26) Details of the landscaping planting plans and schedules of trees and plants, including species, sizes and numbers, along with details of all new trees and bushes, and trees that are to be retained, and a written specification of the landscape works (including a programme for implementation, cultivation and other operations associated with plan and grass establishment) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved landscaping planting plans and schedules prior to first occupation of the development.

Any tree or shrub which forms part of the approved landscaping which, within a period of five years from planting, fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed, shall be replaced in the next planting season by a tree or shrub of a similar species, size and maturity.

- 27) Details of a lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved lighting scheme prior to first occupation of the development and shall thereafter be retained for the lifetime of the development.
- 28) No development shall take place before details of all walls (including retaining walls), fences, gates or other means of enclosure to be erected in or around the development have been submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development. The means of enclosure shall be carried out in accordance with the approved details and shall thereafter be permanently retained and maintained.

- 29) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revising revoking and re-enacting that Order with or without modification), no new fences, gates, walls or other means of enclosure shall be erected without the prior written approval of the Local Planning Authority.

**End of schedule**



## **APPEARANCES**

### FOR THE APPELLANTS:

John Sneddon

Managing Director, Tetlow King  
Planning

David Boden

Pacalis Group Companies

Matthew Hunt

BLCP Eden 1 Ltd and BLCP Eden 2 Ltd

### FOR THE LOCAL PLANNING AUTHORITY:

Mark Mirams

Principal Planning Officer

Emma Henshall

Senior Planning Officer, Policy

Naiomi Sargant

Planning Officer, Policy

Nicky Biddall

Kent County Council Public Rights of  
Way Officer

### INTERESTED PARTIES:

James Corrish

Local resident

## **APPENDIX 5**



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## Appeal Decision

Hearing held on 9, 10 and 21 December 2020

Site visit made on 11 December 2020

**by J Moss BSc (Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 25<sup>th</sup> February 2021

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**Appeal Ref: APP/G5180/W/20/3249202**

**Land at the former Hayes Bowls Club, West Common Road, Hayes, Bromley BR2 7BY**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Michael Hirsch of Carebase Limited against the decision of the Council of the London Borough of Bromley.
  - The application Ref DC/19/01794/FULL1, dated 7 May 2019, was refused by notice dated 4 October 2019.
  - The development proposed is: Change of use of the existing bowls pavilion to D1 (non-residential institution use), and erection of a 3 storey building plus basement to provide a 60 bed care home (Use Class C2), with associated outdoor and indoor amenities, parking spaces and landscaping.
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### Decision

1. The appeal is allowed and planning permission is granted for the change of use of the existing bowls pavilion to D1 (non-residential institution use), and erection of a 3 storey building plus basement to provide a 60 bed care home (Use Class C2), with associated outdoor and indoor amenities, parking spaces and landscaping on land at the former Hayes Bowls Club, West Common Road, Hayes, Bromley BR2 7BY in accordance with the terms of the application reference DC/19/01794/FULL1, dated 7 May 2019, subject to the conditions set out in the schedule attached to this decision.

### Application for costs

2. An application for a partial award of costs was made by Michael Hirsch of Carebase Limited against the Council of the London Borough of Bromley (LBB). This application is the subject of a separate decision.

### Procedural Matters

3. The description of the proposed development was amended during the course of the application. This amendment was in relation to the use of the existing pavilion building, which would be retained as part of the proposed scheme. The description of the development above has, therefore, been taken from the decision notice. This description is also repeated in the signed and dated statement of common ground (SOCG).
4. Although a change of use of the pavilion building is sought in this case, no 'proposed' plans of the building were submitted with the planning application,

save for the historic layout plan illustrating its use as a bowls pavilion<sup>1</sup>. At the hearing the appellant confirmed that no internal amendments are proposed to accommodate the proposed use.

5. The Council had refused the application suggesting that in the absence of an energy assessment the development would be contrary to certain policies of the development plan, which includes the London Plan March 2016 (LP) and the London Borough of Bromley Local Plan January 2019 (LBBLP), as well as the Mayor of London's Energy Assessment Guidance dated October 2018. In response to this particular matter the appellant provided the Energy and CO<sub>2</sub> Reduction Strategy dated January 2020. In its statement of case the Council has confirmed that following the receipt of the strategy, its concerns in this regard have been addressed. A condition has been suggested that would require compliance with the strategy.
6. Having regard to the above, I am satisfied that this matter is no longer a main issue in this case.
7. A unilateral undertaking (UU) was submitted during the appeal, but at the time of the hearing it had not been signed and dated. I subsequently received a signed UU dated 22 December 2020; I have determined the appeal on the basis of this version.
8. Although the lack of a health contribution is referred to in the fifth reason for refusal, the Council are now satisfied that the health contribution included within the UU is satisfactory. Whilst I will return to the provisions of the UU later in this decision, I am satisfied that the matter of the mitigation of the development's impact with regard to the provision of health facilities is no longer a main issue in this case.
9. A condition relating to the door in the rear (south facing) elevation of the pavilion building had not been suggested by any party or discussed during the hearing. After the close of the hearing the main parties were provided with the text of the condition and asked for their comments in this regard. I have had regard to the response received.
10. I visited the site and the surrounding area after the second day of the hearing. At the site itself I was accompanied by representatives from the Council, the appellant and interested parties. I was also able to view the site and immediate area from the balcony of flat No 9 of Burton Pynsent House (BPH). I also viewed the site and surrounding area from the viewpoints agreed on the site visit itinerary<sup>2</sup>.

### **Main Issues**

11. The main issues in this appeal are as follows:
  - i. Whether the location of the proposed development would be acceptable, having regard to the local and national planning policies on such matters as open space (including designated Urban Open Space), sports facilities, community facilities and social infrastructure, and

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<sup>1</sup> The plan entitled 'Bowls Club Proposed Clubhouse', plan reference 117/BC/01 Revision B.

<sup>2</sup> HD19

- whether there is an identified need for the existing open space and sports facility;
- ii. The effect of the development on the character and appearance of the area, as well as the openness of the Urban Open Space and the residential environment;
  - iii. The effect of the development on the living conditions of nearby occupiers;
  - iv. Whether the location of the proposed development would be acceptable, having regard to access to it by sustainable transport modes as well as access to everyday services and facilities;
  - v. The effect of the development on the safe and efficient movement of vehicles and pedestrians within the site and on the surrounding highway network;
  - vi. Any benefits of the proposed development to be weighed in the planning balance, including any need for the provision of a care home.

## **Reasons**

### ***Location of the Proposed Development – Loss of Open Space/Urban Open Space, a Community Facility, Social Infrastructure and/or a Sports Facility***

12. The appeal site adjoins BPH and its grounds, and shares an access off West Common Road (WCR) with BPH and the cricket ground. The buildings and grounds of Hayes School are to the north. The site itself is occupied by an overgrown bowls green, a pavilion and associated parking area.
13. The appellant suggests that since the bowling green was vacated by the former bowls club, it serves no recreation or sporting function and that it is not an available sport and community facility. He points to there being no reference to the appeal site in the Council's Open Space Sports and Recreation Assessment 2017 (OSSRA)<sup>3</sup>.
14. I acknowledge that the site is currently vacant, however I have not been advised of there having been any other use of the site since it was vacated by the bowls club. As such, whilst the site is not currently used, it is right to regard the site as an outdoor sports facility for the purposes of applying planning policy. Whether there is a need for this facility and the likelihood of it being used again as a bowling green (or for any other type of outdoor sports) is a matter considered in more detail later in this decision.
15. The scheme proposes a 60 bed care home within a 3 storey building, with associated outdoor space and parking. The new building and its garden area would more than cover the area occupied by the bowling green, and parking would be provided in the approximate location of the existing parking area. The scheme also proposes the retention of the existing pavilion building, which would accommodate a non-residential institution use.

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<sup>3</sup> HD05.

*- Policy and Guidance*

16. The appeal site, BPH, the cricket ground and Hayes School occupy an area identified in Policy 55 of the LBBLP as Urban Open Space (UOS). The supporting text of Policy 55 informs that UOS is of local significance and suggests that these areas provide important breaks within the built up area. It also suggests areas of UOS have a specific function within their locality, but not all have public access.
17. The Policy sets out three circumstances where proposals for built development will be permitted on UOS. These are, in short, where:
  - a) The development is related to the existing or allocated use;
  - b) The development is small scale and supports the outdoor recreational uses; or
  - c) Any replacement buildings do not exceed the site coverage of the existing development on the site.
18. The UOS designation in Policy 55 has the support of LP Policy 7.18 (Protecting Open Space and Addressing Deficiency), which informs that 'the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area'.
19. In addition to the above, as a sports facility the site as a whole would fall within the definition of social infrastructure, as defined in the supporting text of LP Policy 3.16 (Protection and Enhancement of Social Infrastructure). As such, this Policy and LBBLP Policy 20 (Community Facilities) are relevant in this case. Furthermore, as an existing sports facility, both LP Policy 3.19 (Sports Facilities) and LBBLP Policy 58 (Outdoor Sport, Recreation and Play) are relevant to the appeal site.
20. In general all of the above policies seek to protect and enhance the existing provision, but some advise on the circumstances where their loss would be acceptable. Paragraph 97 of the National Planning Policy Framework (the Framework) takes a similar approach, stating that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless one of three circumstances can be complied with. In this regard, criterion (a) of paragraph 97, as well as policies 20 and 58 of the LBBLP allow development where an assessment demonstrates that there is no longer a need for the land or buildings. Policy 3.16 of the LP states that proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted'.

*- Loss of UOS/Open Space*

21. As noted above, the appeal site is within an area identified in the LBBLP as UOS which is provided with a level of protection by Policy 55. As such, it falls within the definition in the LP of protected open space<sup>4</sup> for the purposes of Policy 7.18, it being land that is subject to a local designation regardless of it being in private ownership where public access is restricted. Whilst I acknowledge that the UOS contains existing buildings, it also contains

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<sup>4</sup> The definition on page 420 of the LP.

significant areas of land that are void of built development, such as the appeal site (save for the pavilion building). These areas provide the visual break within the surrounding built up area that is described in the supporting text of Policy 55.

22. As the scheme proposes new development on land that is currently void of buildings, the proposal would result in the loss of protected open space, which is resisted by LP Policy 7.18. Furthermore, the scheme would not propose equivalent or better quality provision elsewhere within the local catchment area, as required by the Policy.
23. In addition to this, the development would not comply with any of the three circumstances stated in Policy 55 of the LBBLP where built development will be permitted on UOS. It would not be related to the existing outdoor bowling green use, it would not support the outdoor recreational use currently on site, and the new development would not replace existing development on site. It would not, therefore, be permitted by Policy 55.
24. At the hearing the appellant suggested that, even if compliance with one or more of the three criteria listed in Policy 55 is not achieved, the following part of the Policy would permit development where any benefits to the community resulting from the scheme would outweigh the loss of open space. The Policy states that '**subject to the clauses above**, where built development is involved; the Council will weigh any benefits being offered to the community.....against a proposed loss of open space'. The part of the Policy I have highlighted means that compliance with one of the three criteria is required before the balancing exercise is undertaken. The Policy clearly states that proposals for built development in UOS will be permitted **only** under the circumstances listed. Accordingly, the Policy would not permit development that does not comply with the criteria listed, even if any benefits to the community outweigh the loss of open space.
25. Paragraph 97 of the Framework also seeks to resist development on open space land. However, as I note above, it provides a list of three criteria where development might be permitted, which include an assessment that demonstrates that the land is surplus to requirements. As the open space in this case is a sports facility, and sports buildings and land are also subject to the provisions of paragraph 97, I have considered this matter later in this decision under the section on loss of the sports facility.
26. With regard to the extent of harm that results from conflict with LBBLP Policy 55 and LP Policy 7.18, I acknowledge the appellant's case with regard to the contribution the appeal site makes to this particular area of UOS and the effect the development would have on that contribution. Whilst these are matters I consider at relevant points later in this decision, my initial conclusion with regard to policies 55 and 7.18 is that these do not permit the development proposed in this case.
27. Notwithstanding this, the appellant provides a number of reasons why limited weight ought to be given to the UOS designation. I have dealt with each of these in turn as follows.
28. The appellant points to the local plan background evidence to support Policy 55 and suggests that this fails to refer to the appeal site and the wider UOS

within which it is located. As such, he suggests that this area of UOS is based on out of date evidence.

29. I have been provided with some of the background evidence submitted in support of the now adopted (January 2019) LBBLP, including the OSSRA<sup>5</sup>, the local plan background paper on Local Green Space (2016) (LGS)<sup>6</sup> and the report to the Council's development control committee on the Review of Greenbelt, Metropolitan Open Land (MOL) and Urban Open Space Boundaries (2012) (the Review)<sup>7</sup>. I have also seen the local plan Inspector's report<sup>8</sup> where at issue 7 she deals with the matter of the policies relating to valued environments, which includes Policy 55. In the section entitled 'Open and Natural Space'<sup>9</sup> the Inspector considers the policies relating to Greenbelt, MOL and UOS together and, with regard to these designations, she specifically refers to the Review.
30. The area of UOS within which the appeal site is located may not have been assessed in the Review, but the Review did not assess all existing Greenbelt, MOL and UOS designations within the Borough. The Review was undertaken only to suggest amendments to the boundaries of these existing designations for inclusion in the local plan<sup>10</sup>. The local plan Inspector acknowledges this<sup>11</sup>, but does not raise any concerns in this regard.
31. Whilst the UOS in this case may not have been included in the OSSRA, I note that this is an audit of 'publicly accessible open space'<sup>12</sup>. At paragraph 2.16 it states that 'the omission of a site does not necessarily mean that it is not considered to be green space and that policies relating to it are not applicable (i.e. Green Belt, Metropolitan Open Land and Green Chain, Urban Open Space and in the emerging Local Plan Local Green Space)'
32. In conclusion on the matter of valued environments (issue 7 of the report) the Inspector confirms that 'subject to the proposed MMs the policies relating to valued environments are justified, consistent with national policy and the London Plan and effective'<sup>13</sup>.
33. Having regard to the breadth of evidence and representations that would have been considered by the local plan Inspector, I have no reason to disagree with her conclusions with regard to Policy 55 and the UOS designation. I acknowledge that the area of UOS in this case was not specifically assessed in the Council's Local Plan background evidence. However, for the reasons given above I cannot agree with the appellant's suggestion, that the value of the UOS in this case is less than other areas of UOS within the Borough and that for this reason the weight attributed to any harm I identify that would result from conflict with Policy 55 ought to be limited.
34. That the UOS in this case was not put forward as an area of Local Green Space in the LGS would not reduce its value as an area of UOS, i.e. an area of local significance, fulfilling a specific function in the locality and providing an

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<sup>5</sup> HD05.

<sup>6</sup> HD03.

<sup>7</sup> HD13.

<sup>8</sup> HD11 the Report on the Examination of the Bromley Local Plan dated 11 December 2018.

<sup>9</sup> Paragraphs 82 to 87 of HD11.

<sup>10</sup> Paragraph 1.1 of HD13.

<sup>11</sup> Paragraph 83 of HD11.

<sup>12</sup> Paragraph 1.13 of HD05.

<sup>13</sup> Paragraph 90 of HD11.



important break within the built-up area . Neither would it reduce the weight attributed to any harm resulting from conflict with the UOS policy. It simply means that the protection afforded to Local Green Spaces would not apply to the appeal site. That the Local Green Space designation might well benefit from a greater degree of protection is of no consequence in this case. It is right to only considered the development in the context of the open space policy that is relevant to the appeal site, having regard to the distinct functions or qualities of the particular designation and the type of protection provided by the policy.

35. The appellant has drawn my attention to a 2018 decision<sup>14</sup> for two appeals that were determined prior to the date of the local plan Inspector's report and the adoption of the LBBLP. These appeals relate to development on another area of UOS within the Borough. As with the case before me, the site had not been referred to in the OSSRA. Whilst I note the Inspector's criticism of the lack of a full assessment or review of the Council's open space designations as part of the background evidence for the now adopted LBBLP, I am mindful of the more recent local plan Inspector's decision and her conclusions in respect of the UOS designation and policy, which were arrived at having regard to the documents referred to in the 2018 decision.
36. Notwithstanding this, I note that in the 2018 decision the Inspector found conflict with the previous UOS development plan policy (Policy G8), but identified only limited harm resulting from that conflict, having considered matters that were particular to that site. For example, he did not consider the site to provide an important break within the built-up area and concluded that the development would result in limited harm to openness and the local residential environment. He also had regard to several other nearby breaks in the local built-up area, some of which had MOL and UOS designations. In dismissing the appeal the Inspector balanced the limited harm identified against a 'current pressing need to provide additional dwellings in the Borough'. Accordingly, the Inspector had regard to site specific matters and his conclusions result from the planning balance exercise.
37. Having regard to the above, my conclusions in respect of the value of the area of UOS in this case and the weight attributed to any harm resulting from conflict with policies 55 and 7.18 are not altered by this appeal decision.
38. To summarise so far on the matter of the loss of UOS/open space, the development would not be permitted by any of the criteria set out in LBBLP Policy 55 and would, therefore, conflict with this policy, as well as Policy 7.18 of the LP. Furthermore, I have been unable to identify any reason so far to reduce the weight I attribute to any harm that results from conflict with these policies.

*- Loss of a Community Facility, Social Infrastructure and/or a Sports Facility*

39. As confirmed earlier in this decision, for the purposes of planning policy the appeal site is regarded as an outdoor sports facility, as referred to in Policy 3.19 of the LP and Policy 58 of the LBBLP. Such facilities also fall within the definition of social infrastructure, which is the subject of Policy 3.16 of the LP and Policy 20 of the LBBLP. The existing outdoor bowls facility is also

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<sup>14</sup> Appeal reference APP/G5180/W/17/3174961 & APP/G5180/W/17/3179001 - Land at the junction of South Eden Park Road and Bucknall Way, Beckenham BR3 3LZ.

identified as being a use that is found within an area of UOS. The use can, therefore, be regarded as filling that specific function in this locality<sup>15</sup>, which is one of the purposes of the UOS designation. I have already noted that, in general, each of these policies seek to protect and enhance the existing provision.

40. The development proposes the change of use of the existing pavilion building and a new 3 storey building, with associated outdoor space and parking. The new building and its garden area would more than cover the area occupied by the bowling green, and parking would be provided in the approximate location of the existing parking area. The development would, therefore, result in the loss of the existing sports facility.
41. The loss of a sports facility might well be resisted by the policies listed above. However, Policy 3.16 of the LP and Policy 20 of the LBBLP seek to provide, protect and enhance **all** types of high quality social infrastructure. Paragraph 3.86 of the LP confirms that social infrastructure covers a wide range of facilities, including both sports facilities and facilities for health provision. In this regard, the scheme proposes a non residential institution use in the pavilion building, which the appellant advises would 'provide a dedicated community hub, which would include working directly with Dementia UK and to have an admiral nurse on site to support the local community and provide independent and free advice'. At the hearing it was confirmed that this use would be linked to the dementia care provided in the care home. The admiral nurse would work within the local community and provide support for the families of those who suffer with dementia, including families of the care home residents.
42. In addition, a 60 bed care home is proposed within a 3 storey building. The type of accommodation proposed is described in appendix C of the appellant's statement of case<sup>16</sup>, which confirms that the new building would provide a purpose built specialist facility for nursing, residential and dementia care. The level of care to be provided to residents would range from help with washing and dressing (residential care) to 'full nursing input from a nurse 24 hours a day for matters such as wound management, catheter care, blood monitoring and complex medication administration such as sub-cutaneous fluids, injections etc. (known as Nursing Care)<sup>17</sup>.
43. Having regard to the medical care that would be provided within the new building and the pavilion, the scheme as a whole would provide a facility for health provision. Furthermore, having noted the type of accommodation proposed and the facilities this development would contain, I have no doubt that the development would provide high quality social infrastructure of the sort envisaged in policies 3.16 and 20. Accordingly, whilst I acknowledge that the development would result in the loss of a sports facility, which is resisted by Policy 3.16 of the LP and Policy 20 of the LBBLP, it would provide alternative high quality social infrastructure, which is also permitted by these policies.

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<sup>15</sup> Paragraph 5.2.23 of the LBBLP.

<sup>16</sup> Witness statement of Nicola Coveney, managing director of Carebase Limited, which is Appendix C of the appellant's statement of case.

<sup>17</sup> Paragraph 2.2 of Appendix C of the appellant's statement of case – the witness statement of Nicola Coveney, managing director of Carebase Limited.

44. In reaching the conclusion above I acknowledge that the provision of one type of social infrastructure might not necessarily justify the loss of another. Indeed, Policy 3.19 of the LP and 58 of the LBBLP resist the loss of sports facilities specifically. However, Policy 58 informs that the loss of such facilities will be resisted unless it can be demonstrated that they are surplus to requirements. Similarly, criteria a) of paragraph 79 of the Framework would also allow for development on sports land (and open space land) in these circumstances. In this regard it is the appellant's case that there is no longer a need for a bowling green at the appeal site.
45. The appellant refers to the local plan background paper, the OSSRA, which does not include the appeal site within its list of 20 bowling greens identified in the Borough. This omission does not, however, mean that the appeal site is not valued as an outdoor sports facility or that it does not benefit from the protection of policies 3.19 and 58.
46. Nevertheless, the OSSRA does not assist in identifying a particular shortfall or surplus in the number of bowling greens, or indeed any other type of sports facility in the Borough<sup>18</sup>. It does, however, confirm at paragraph 8.38 that most residents are within 15 minute drive of a bowling green, which is identified as the accessibility standard for this type of facility<sup>19</sup>. The Map 8.3 on page 135 of the assessment also shows that the bowling greens listed are located in the northern part of the Borough, and that there are a number close to the appeal site. Indeed, the appellant suggests that there are 29 other bowls clubs within a 5 mile radius of the appeal site<sup>20</sup>. Whilst I note the Council's comments with regard to some of those suggested by the appellant, I do not agree that the 9 greens that are located outside of the Borough should be discounted; I have not been advised that residents from within the Borough are unable to use these greens.
47. As for an alternative outdoor sports use for the site, at the hearing the Council were unable to point me to another sport that could be accommodated on the existing facility, in particular one where there is currently a deficiency of facilities in the area. It was, however, suggested that there are deficiencies for particular sports facilities across the Borough. Notwithstanding this, Sport England suggest that their objection to the development might be overcome if the loss of the facility were mitigated through improvements to other bowls facilities in the area. I have dealt with the mitigation contribution later in this decision.
48. In addition to the above, the appellant points to the fact that the appeal site has been vacant for a period of around 4 years since it was last used by the former bowls club. The appellant has marketed the site and provided details of the marketing exercise. The site as a whole was placed on the market between October 2017 and November 2018 and, whilst this generated some interest in the site, the appellant advised that no party sought to use the site as a bowling green or as any other outdoor sports facility. I note from the table provided at the end of the witness statement of Adrian Tutchings<sup>21</sup> that the majority of those interested primarily sought to use the pavilion, rather than the outdoor sports pitch. Indeed, following the potential letting of the

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<sup>18</sup> Paragraph 13.19 of the OSSRA – HD05.

<sup>19</sup> Paragraph 8.25 of the OSSRA – HD05.

<sup>20</sup> Paragraph 4.18 of the appellant's planning statement dated August 2019.

<sup>21</sup> Witness statement of Adrian Tutchings, which is Appendix E of the appellant's statement of case.

pavilion to the CASPA organisation, when only the bowling green and 6 parking spaces were advertised as being available, no interest was generated.

49. I have been provided with correspondence from 2016 regarding the interest shown by the residents of BPH in leasing the site<sup>22</sup>. Whilst I can see that their interest was rejected by Bespoke Senior Leisure at that time, at the hearing it was confirmed that no enquiries were made by the residents following the most recent marketing exercise.
50. I note the Council's concerns regarding the period of marketing, but can see that the site as a whole was on the market for in excess of 12 months, exceeding the 6 month period considered appropriate in the officer's report. Furthermore, whilst the Council suggests some shortcomings in the extent of marketing, I have not been made aware of a more appropriate means of marketing for such a facility. The appellant acknowledged that there has been a marked increase in the rental value of the site and that this contributed to the bowls club vacating the site. However, at the hearing Mr Tutchings suggested that the rent paid by the bowls club was particularly low and that the rental value advertised was realistic, particularly having regard to the parking spaces that would accompany the offer. Whilst I note the Council's concerns regarding the rental value, I have not been provided with evidence, such as comparison rental properties or an alternative valuation, that would lead me to conclude that the rental value is excessive.
51. Having regard to all of the above, I am satisfied that the appeal site has been appropriately marketed and that, despite this, there has been a lack of any interest in its use as a bowling green or as any other outdoor sports facility. It has not been demonstrated that there is a deficiency in the provision of bowling greens in the Borough and, in particular, in the vicinity of the appeal site. Furthermore, my attention has not been drawn to any particular deficiency in other outdoor sports facilities that might be accommodated on the site. In this regard, I am satisfied that it has, on balance, been demonstrated that this outdoor sports facility, being the specific function of this area of the designated UOS, is surplus to requirements.
52. On a final point on this matter, whilst I acknowledge the suggestion by interested parties that the permission granted for BPH prohibits the loss of the appeal site as a sports facility, I have not been provided with any substantiated evidence of any legal agreement or planning condition that would prohibit the development proposed.

*- Conclusions on Location*

53. As mentioned above, I have sufficient evidence to demonstrate that there is not an identified need for the existing outdoor sports facility at the appeal site. The loss of this facility as a result of the development proposed would not, therefore, conflict with LBBLP Policy 58 or paragraph 97 of the Framework. Furthermore, having regard to the lack of a demonstrated need for this outdoor sports facility, together with its replacement with an alternative form of high quality social infrastructure, the development would also comply with Policy 3.16 of the LP and Policy 20 of the LBBLP. I acknowledge that LP Policy 3.19 would not permit the loss of the sports facility, despite it being demonstrated that there is a lack of need. However,

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<sup>22</sup> HD07.

having regard to my conclusions in relation to the LP policy on social infrastructure, the definition of which includes sports facilities, any harm resulting from conflict with Policy 3.19 would be limited. I am also mindful of the bowls club financial contribution within the UU that is intended to benefit bowls clubs in the Borough. In this regard, I conclude that the location of the development would be acceptable, despite it resulting in the loss of an existing sports facility, which is otherwise defined as a community facility or social infrastructure.

54. Notwithstanding this, I have already concluded that the development would be in conflict with policies 7.18 of the LP and 55 of the LBBLP. In this regard, its location would not be acceptable as it would result in built development on an area of UOS. However, I have concluded that the specific function of this area of the designated UOS (i.e. an outdoor sports facility) is surplus to requirements. My findings in this regard have the effect of limiting the harm that would result from conflict with policies 7.18 and 55. I have considered the harm that would result from the loss of openness of this area of the UOS in the following section of this decision.

### ***Openness, Character and Appearance***

55. The appeal site is set back from WCR by some 150 metres and adjoins the fairly recent residential development of BPH. The site is also located behind a row of predominantly detached properties along Baston Road and Redgate Drive. The buildings occupying the Hayes School site are clustered close to the boundary of the school shared with the appeal site and the access drive. The grounds to the rear of BPH wrap around the southern and eastern boundary of the site. Otherwise the appeal site is a predominantly undeveloped parcel of land surrounded by built development.
56. I acknowledge that part of the primary purpose of UOS is to protect its open character and provide an important break within the built-up area. The appeal site achieves this purpose and I was able to appreciate its open character from within the site, as well as from the adjoining BPH and its grounds. However, during the site visit I noted that there are very few opportunities to appreciate the site's open character from public vantage points. Any views between the dwellings along Baston Road and Redgate Drive were glimpsed and, in general, were only of the hedge and tree line along the rear boundary of the dwellings.
57. Views of the site from WCR were mostly obstructed either by BPH or the buildings and enclosures within the Hayes School site. The most prominent view of the site was from the site entrance on WCR. From here I could not appreciate the open character of the site, particularly as only part of it was visible and framed by BPH and the mature tree line within the Hayes School site, along the boundary. In contrast to this, the expanse of the cricket ground to the front of the BPH and the playing fields within the school's grounds provide a real sense of openness, particularly when viewed alongside the built development on WCR. It is easy to conclude that such areas make a significant contribution to the UOS designation.
58. UOS is intended to make a significant contribution to the residential environment. The appeal site provides a break in development and possesses an open character. In this regard it does make a positive contribution to the

UOS designation. However, its contribution to the overall residential environment is tempered by reason of the limited public views of the site.

59. The scheme proposes the construction of a three storey L shaped building with basement. This would be separated from the existing pavilion by an enclosed garden. The associated parking and turning area would be located on the site of the existing hard surfaced parking area, and the site as a whole would be landscaped.
60. I acknowledge that the introduction of built development on undeveloped land would inevitably have a detrimental effect on the openness of the site. However, I note that the new building would not occupy the whole of the open space to the rear of BPH. A degree of separation and open space would be retained between the development and the dwellings along Baston Road and Redgate Drive. In view of this, it is unlikely that there would be prominent views of the development from these public vantage points; any views are likely to be disrupted by the mature tree and hedge line to the rear of the dwellings.
61. Furthermore, it is likely that the only prominent public view of the development would be from the site entrance on WCR. Even then it is likely that only the wing of the building closest to the pavilion would be visible, which itself would be set back within the appeal site. The wing closest to BPH and Hayes School would be screened by the mature tree line and vegetation on the school site.
62. Having regard to the above, whilst the development would cause detriment to the openness of the appeal site and this part of the UOS designation, the degree of harm caused to the residential environment would not be significant as views of the development would be limited from public vantage points.
63. Notwithstanding the above, the Council suggest that the position of the building, set off WCR, and the concealed nature of the entrance, behind BPH, is at odds with the pattern of development in the area. However, neither the cricket pavilion, BPH nor the Hayes School complex of buildings have a roadside frontage. Whilst all are accessed off WCR, they are all set off the highway and accessed via long private drives. The appeal scheme would be no exception to this.
64. Furthermore, I note that the wing of the building closest to the pavilion would have a shallow pitch, whilst the wing closest to BPH would have a split pitch. Both would be lower in height than BPH. Indeed the building overall would be comparable in scale to the nearby 2 and 3 storey buildings on the adjoining Hayes School site<sup>23</sup>. I do not, therefore, find the scale or mass of the proposed building excessive.
65. With regard to the appearance of the development, whilst I acknowledge that it's modern design would not replicate that of BPH or the surrounding dwellings, there is variety in building styles in the surrounding area, particularly on the Hayes School site. The contrasting design is not, therefore, out of character in this area.

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<sup>23</sup> As demonstrated on page 22 and 23 of the appellant's Architectural Statement dated 27 May 2020.

*- Conclusions on Openness, Character and Appearance*

66. Having regard to the findings above, I conclude that the development would have an acceptable effect on the character and the appearance of the surrounding area. For this reason the development would comply with LP Policy 7.4 (Local Character) and LBBLP Policy 37 (General Design of Development) that require a high quality and standard of design that, amongst other matters, is attractive to look at; has regard to the pattern and grain of the existing spaces; and complements the scale, proportion, form, layout and materials of adjacent buildings and areas.
67. As for the effect of development on the openness of the site and the UOS, I have already concluded that the development would conflict with the UOS designation policy (Policy 55) of the LBBLP. The development would have a detrimental effect on the open character of the site and would, therefore, cause harm in this regard. However, as public views of the development are likely to be limited and a degree of open space surrounding it would be maintained, the proposed scheme would cause only moderate harm to the openness of the UOS and the surrounding residential environment.

***Living Conditions***

*- Outlook and Privacy*

68. As noted above, the grounds of BPH, that wrap around the southern and eastern boundary of the site, would separate the development from the rear boundary of the properties along Baston Road and Redgate Drive. Having regard to the degree of separation, as well as the intervening mature tree and hedge line along the rear of these nearby properties, it is unlikely that the development would have an unacceptable effect on the outlook or privacy currently enjoyed by the occupiers of these dwellings.
69. The appeal site adjoins the complex of apartments occupying BPH. Most apartments have balconies and residents have access to shared areas of open space around the building, including the L shape area described above. A parking and turning area serving BPH also adjoins the western boundary of the appeal site. Residents of BPH, particularly those occupying flats in the northern half of the building, currently enjoy a fairly open outlook over the appeal site.
70. I was able to view the appeal site from flat No 9 within BPH, which is on the upper floors of the building and has windows and balconies (to the side on the north facing elevation and rear on the east facing elevation) that are amongst the closest to the appeal site.
71. The proposed building is designed in an L shape and the outside elevations would be positioned just beyond the northern and eastern hedge boundary of the current bowling green. It would, therefore, be separated from BPH by the secure garden that would serve the care home. The building would be particularly visible from BPH and is likely to be a prominent feature in the immediate surroundings, particularly when viewed from apartments in the northern part of the complex. Indeed, the scheme would result in a greater quantum of development than currently exists within the setting to the rear of BPH. However, the building would be more than 27 metres from the side

elevation of BPH and more than 38 metres from the rear elevation<sup>24</sup>. Furthermore, it would be located in the periphery and not in the direct views from apartment No 9 and others in this part of BPH. Accordingly, while the development would affect the outlook from BPH, there would not be an unacceptable degree of harm caused in this regard.

72. With regard to the effect of the development on the privacy of the occupiers of BPH, I note that the new building would not have any elevations that would directly oppose those in BPH. As such, there would not be any direct views from windows in the care home into windows in the adjoining apartment complex. Any views would also be limited by reason of the degree of separation between the two buildings. Whilst I acknowledge that those arriving at the site, those using the care home's secure garden and those accessing the pavilion building would see some of the balconies and windows in BPH, any views of those visitors, employees or residents would be at a distance, at an obtuse angle, or screened by the site's enclosure. Any views from the site towards BPH and its grounds would not, therefore, cause an unacceptable degree of harm to the privacy of its occupiers.
73. There are no amendments proposed to the elevations of the pavilion and I note that all windows facing onto BPH and its grounds are high level. This is noted by the Inspector in the previous appeal decision<sup>25</sup> for the change of use of the pavilion to a dwelling. I agree with her conclusions in this regard, that there would be limited potential for overlooking of the grounds of BPH from these windows. However, the Inspector notes that the rear door of the pavilion is clearly glazed and concludes that, whilst a condition could be imposed to require obscure glazing, it would be unreasonable to prevent it from opening. As such she concludes that its use would cause harm to the living conditions of the occupiers of BPH due to a loss of privacy.
74. The door opens onto land that is garden area associated with BPH and I have not been advised that the appellant would have any control over that land. Indeed, the boundary of the appeal site is drawn tightly around the rear of the pavilion building and the plan provided during the hearing by the residents of BPH<sup>26</sup> illustrating the boundary of ownership is consistent with this. I also note that no access path is proposed from the rear door of the pavilion to any other part of the appeal site. For this reason, and having regard to the use for the building proposed in this appeal, I do not consider a condition prohibiting the use of the door (except in an emergency) to be unreasonable. Subject to this condition, and a requirement for obscure glazing, the presence of the door would not render the proposed use of the pavilion unacceptable by reason of a loss of privacy to the occupiers of BPH.
75. Whilst the activity within the pavilion may well differ from that generated by its use as a bowls pavilion, I have no reason to conclude that the proposed use would cause an unacceptable degree of harm to the privacy of residents of BPH.

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<sup>24</sup> Measurements shown on page 29 of Architectural Statement dated 27 May 2020.

<sup>25</sup> Appeal reference APP/G5180/W/16/3160356 – Appendix 6 of the Council's hearing statement.

<sup>26</sup> HD08.



*- Noise and Disturbance*

76. The Council suggest that the development would generate a significant amount of employment related activity and that this would be on a 24 hour basis. When compared to the existing use of the site, the development would be a more intensive use that would have an adverse effect on the living conditions of nearby residents. This is also a matter raised by a significant number of local residents.
77. A detailed description of how the care home and the pavilion would operate was provided at the hearing and in the appellant's evidence<sup>27</sup>. This evidence was from the appellant's managing director, Nicola Coveney, and is based on the appellant's experience of operating 14 other similar healthcare facilities. It was suggested that a care home of the size proposed would typically employ 60 full and part time staff and that most of the staff would change shifts at 0700 hours and 1900 hours. The arrival and departure of other medical practitioners, deliveries or other staff working at the site would generally occur during the daytime hours, as would friends and family visiting residents. It was confirmed that in general the site would not have a noisy environment as this would have a negative effect on the wellbeing of residents.
78. As for evening and night time activity, Ms Coveney explained during the hearing that residents' bed times would be early evening and that activity within the care home would be kept to a minimum during the evening and at night to prevent disturbance whilst residents are sleeping. Indeed, only 7 staff would be present on site for the night time shift.
79. As for the proposed use of the pavilion building, at the Hearing Ms Coveney suggested that this would provide office space and a consulting room for only 1 nurse for a limited number of days a week. Whilst the nurse would see patients or their families at the pavilion, they would also undertake visits in the community, away from the site.
80. The site is described as tranquil by many of the interested parties and I acknowledge that this might be an appropriate description of this vacant site at present. However, I must consider how the proposed development would compare with an active use of the site as an outdoor sports facility. I have not been advised of the likely visitor numbers or activity that this would generate. Nevertheless, having regard to the nature of such a use, I acknowledge that it is likely that the proposed development would generate an increase in activity at the site. I also acknowledge that such activity might occur at times of the day when an outdoor sports facility would not ordinarily be in use, such as in the early morning (i.e. during the 0700 hours shift change).
81. It is likely that vehicle and pedestrian activity would be greatest in the car park and around the main entrance to the building (in the elevation facing Hayes School). Whilst this area of the site would be adjacent to the rear boundary of properties along Baston Road, I note that these properties have the benefit of a long garden that would maintain a degree of separation between the dwellings and the parking area. Indeed, the Council refer to the

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<sup>27</sup> Witness statement of Nicola Coveney, managing director of Carebase Limited, which is Appendix C of the appellant's statement of case.

distances separating the development and properties on Baston Road and Redgate Drive<sup>28</sup>, suggesting that the scheme 'would not result in an adverse impact on residential amenities' in this regard. I have no reason to disagree with this conclusion.

82. Although those arriving or leaving the site would pass BPH, the main entrance and parking area would be in the furthest part of the site from the apartment complex and would be separated from it by the new building itself. Activity in the secure garden is unlikely to generate a significant level of noise as the appellant indicated that residents would react negatively to a noisy environment. Furthermore, having regard to the nature of the proposed use of the pavilion as an office and consultancy space for a medical practitioner, activity generated by this use would be contained within the building itself, is likely to be limited to the daytime hours, and is not likely to generate considerable noise or disturbance. For these reasons it is unlikely that activity within the pavilion or the care home garden would have an unacceptable effect on the residents of BPH, despite the proximity of the apartments and their shared garden to the development.
83. Both the Council and interested parties have expressed concern with regard to the likelihood of noise and disturbance at night time and the potential for a high number of emergency vehicles attending the site. Whilst I acknowledge that some of the residents in the care home might well be frail or very ill, Ms Coveney suggested that, in view of the level of nursing care that would be provided at the site, staff on site would deal with most medical emergencies that occur. She suggested that the need for emergency vehicles to visit the site would, therefore, be very limited. Based on the evidence before me, emergency vehicles are unlikely to be a cause of noise or disturbance in and around the site. Furthermore, having regard to the evening and night time environment described by the appellant, it is unlikely that noise generating activity would occur at these times (i.e. after the 1900 hours shift change and before the 0700 hours shift change).
84. In addition to this, whilst lighting on the site might be required at night, the appellant's evidence demonstrates the need to ensure that lighting would not disturb residents while they sleep. I acknowledge the concern raised by interested parties with regard to odours from the on-site kitchen, fumes from vehicles manoeuvring and idling in the car park, and noise from plant and machinery on site. However, I note the lack of objection to the development from the Council's environmental health officer. Notwithstanding this, the appellant has confirmed that all plant would be contained within the building. I was also given no reason to conclude that there would be instances of vehicles idling in the parking area. Again, I am mindful that the residents of the development would be particularly sensitive to disturbance of their environment. The control of external lighting, noise, odour and fumes on site would, therefore, be in the interests of the appellant. For this reason it is unlikely that the development would result in an adverse effect on nearby occupiers in this regard.
85. Overall, I acknowledge that the development would generate a greater level of activity on site and that this might generate a greater degree of noise and disturbance when the proposed use of the site is compared to its use as a

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<sup>28</sup> Officer Report.

sports facility. However, having regard to my findings above, I conclude that any noise and disturbance generated is unlikely to result in an unacceptable degree of harm to the living conditions of nearby residents.

*- Conclusion on Living Conditions*

86. For the reasons given above, I conclude that the effect of the development on the living conditions of nearby occupiers would be acceptable. The proposal would, therefore, comply with Policy 37 of the LBBLP, which requires development to, amongst other matters, respect the amenity of occupiers of neighbouring buildings, provide healthy environments and ensure they are not harmed by inadequate privacy, or by noise and disturbance. Furthermore, the development would not conflict with LP Policy 7.4 which requires at criterion c that development is human in scale and ensures that people feel comfortable with their surroundings.

***Location of the Development - Access by Sustainable Transport Modes***

87. At the hearing it was agreed that the policies referred to in the Council's decision notice that are most relevant to this main issue are LP Policy 3.17 (Health and Social Care Facilities) and LBBLP Policy 11 (Specialist & Older Peoples Accommodation). Policy 3.17 relates to health and social care facilities and requires that these are located in places easily accessible by public transport, cycling and walking. Similarly, Policy 11 provides support for specialist housing where it is 'conveniently located for a range of local shops, services and public transport'. However, the policy informs that this should be 'appropriate to the mobility of the residents'.
88. Whilst the Council suggests that local shops and services are not easily accessed from the site, it is the appellant's case that, having regard to the type of facility proposed, there would be a reduced need for access to everyday services and facilities. Both at the hearing and in the statement of case the appellant suggested that, due to the fragility of residents and as many will suffer with dementia, the need for residents to leave the facility would be very limited. Residents would not be able to leave the site unless accompanied by a carer, and any trips from the site would be by private vehicle, regardless of the distance to be travelled or ease of access to more sustainable transport modes. Any services such as dental care, hairdresser or chiropody would be provided on site and a GP would visit the site on a weekly basis.
89. In addition to this, once at the site there would be a limited need for staff to access local services and facilities. The appellant suggested that, in the interest of continuity of care, staff would not be encouraged to leave the facility during a shift and all meals would be provided on site.
90. Based on the evidence before me, I agree with the appellant, that there would be limited need for residents and staff to have easy access to everyday services and facilities by sustainable transport modes as the vast majority of their everyday needs would be met on the site.
91. With regard to staff and visitors travelling to the site, the Council suggest that this location does not benefit from good transport links. It points to the appeal site's rating as between 1b and 2 on the Transport for London's scale

of public transport accessibility levels (PTAL), which is towards the lower part of the scale.

92. Whilst I acknowledge this, I note that the development type and PTAL matrix on page 108 of the LBBLP informs that development such as that proposed is acceptable in principle in a location with a level 1 and 2 PTAL. Added to this, the appellant has proposed a travel plan that it has implemented at other of its care home sites.
93. The bus stops on Baston Road were drawn to my attention. These are around 500 metres from the WCR entrance to the appeal site. Added to this is the distance from the site entrance to the building, which is around 180 metres. The Council suggests the frequency of the two bus services that can be accessed from these stops as 4 per hour and 1 per hour. The appellant suggests that these bus services provide good local connections, which is important as staff are likely to live in the local area<sup>29</sup>. I was also able to see the railway station at Station Hill, which is within a local shopping area that is around 700 metres from the site entrance. The appellant suggests that both the bus stops and the railway station are within the maximum walking distance used by Transport for London for them to be considered accessible when calculating an area's PTAL.
94. The appeal site is within easy walking distance of both bus stops and a railway station, which itself is located adjacent to local shops, and I did not consider the gradient of the routes to these public transport links to be significant. Whilst I acknowledge that there is no footpath along a section of WRC, between the appeal site entrance and the junction of Warren Road with WCR, this stretch of some 150 metres is lit and overlooked by the row of dwellings along this route. I do not, therefore, find the identified public transport links any less accessible. The lack of a footpath within the site (along the access drive) would not in my view deter pedestrians from accessing the site. I was advised that the driveway is lit at night and traffic on the drive would only be limited to those accessing the site, BPH and the cricket ground.

*- Conclusion on Location - Access by Sustainable Transport Modes*

95. Having regard to the mobility of the future residents of the development and the provision that would be made for residents and staff on site, the need for a location convenient to local shops, services and public transport would be limited. As such, and having regard to the location of the appeal site, which I consider to have reasonable access to such services, the development would not conflict with the LBBLP Policy 11. Furthermore, having regard to the proximity of the development to bus and rail services, I am satisfied that the development would be in compliance with LP Policy 3.17. For these reasons, I conclude that the location of the proposed development would be acceptable, having regard to access to it by sustainable transport modes as well as access to everyday services and facilities by sustainable transport modes.

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<sup>29</sup> Paragraphs 3.75 to 3.83 of the hearing statement of Ian Wharton, which is Appendix D of the appellant's statement of case.

### ***Safe and Efficient Movement of Vehicles and Pedestrians***

#### *- Access Drive*

96. The Council's fourth reason for refusal states that 'the proposal fails to fully demonstrate an acceptable access can be provided and maintained for the existing and future users'. When asked at the hearing to expand upon this, the Council confirmed that it has no concerns with regard to the access drive. Indeed, whilst the Council's Highway engineer mentions the driveway, no concerns or objections are raised in this regard. This is, however, a matter of concern for some interested parties.
97. The appellant confirms that the driveway has a width of between 4.1 metres and 4.8 metres, and suggests that this is sufficient to allow for two cars to pass along the whole length of the drive, and a car and large vehicle to pass at the widest parts of the drive. I note that this accords with the recommended carriageway widths shown in table 7.1 of Manual for Streets. Whilst I acknowledge that the drive would serve the development, BPH and the cricket ground, it is likely that there would be limited conflict with vehicles on the drive and, therefore, minimal incidents of vehicles reversing from the site onto the highway.
98. The appellant has acknowledged the lack of a footway on the drive, but it is suggested that in this case it would not be needed. The appellant points to the three criteria set out in Manual for Streets where it informs that shared surfaces are likely to work well<sup>30</sup>. I agree with the appellant that in this case all three criteria are met. Furthermore, I have already noted that the driveway is lit at night.
99. Having regard to the evidence before me, whilst I acknowledge that the development would result in an increase in vehicle and pedestrian movement to and from the site, I have no reason to conclude that this would result in an unacceptable adverse effect on highway safety by reason of conflict with vehicles and/or pedestrians on the access drive. Furthermore, it is unlikely that the development would cause detriment to the safety of drivers or pedestrians using the driveway.

#### *- Point of Access with WCR*

100. I note that the existing arrangements, which include a gated access set off the highway, would be retained without amendment. Although no concerns regarding the point of access were raised by the Council in written evidence, at the hearing the Council suggest that WCR is a 'pinch point' at the point of access to the site, and that there would be conflict from vehicle movement to and from the site with traffic and parked vehicles on WCR. In this regard, at the site visit I noted that there are no parking restrictions close to the site entrance and acknowledge that there were a number of vehicles parked close to the point of access.
101. Whilst I note the Council's evidence at the hearing, it did not disagree with the appellant's suggestion that the vision splay at the access complies with that set out in Manual for Streets, that traffic speeds on WRC are low, and that a reduced speed limit of 20 MPH on this highway will be shortly

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<sup>30</sup> Paragraph 7.2.14 of Manual for Streets and paragraph 3.66 of the hearing statement of Ian Wharton, which is Appendix D of the appellant's statement of case.

introduced. Indeed, the point of access to the site is not a matter referred to in the consultation response from the Council's highway engineer. I acknowledge that parked vehicles close to the entrance might interrupt drivers' view along WCR. However, the Council was unable to point to any technical evidence or objection from its highway engineer to support its case regarding the inadequacy of the site access. Furthermore, I have not been provided with evidence of any incidents of vehicle collisions or accidents involving pedestrians along this section of WCR. Accordingly, I have no reason to conclude that the development would be unacceptable as a result of additional pedestrian and vehicle traffic using the existing point of access to the site with WCR.

*- Traffic Generation and Congestion*

102. The Council criticises the appellant's calculation of trips generated by the development and suggests that, whilst the development would result in minor impact in traffic flows on the local highway network, WCR is often 'log jammed'. It is suggested that traffic generated by the development would conflict with vehicles of parents dropping off and picking up children at Hayes School. I note that these are points raised by many of the interested parties.
103. The appellant has provided an assessment of vehicle movements to and from the site that are likely to be generated by the development<sup>31</sup>. Traffic to and from the site is likely to peak just before and/or just after a shift change, when the appellant suggests that the vast majority of staff would arrive at or leave the site. This would be at a time outside of the morning and evening rush hour. As for visitors, at the hearing Ms Coveney confirmed that visiting times would not start until 1000 hours and that these would typically occur through the day, but not at meal times. As such, it is unlikely that visitors would travel to the site during the morning or evening rush hour. It is also unlikely that the peak flows of traffic to and from the site would conflict with the school generated traffic, which both the Council and interested parties highlight as a cause of congestion on WCR during the morning rush hour and at the end of the school day.
104. Despite the predicted times of peak traffic to and from the site, the appellant confirmed that the weekday peak hour periods were considered in the assessment as these are periods when existing traffic flows on the highway network are likely to be greatest. This approach in an assessment such as this is common and in most cases would demonstrate the worst case scenario.
105. Having regard to the above, I am satisfied that the additional traffic flows generated by the development would not cause detriment to the safe and efficient movement of vehicles and pedestrians on the adjoining highway network.
106. As for construction traffic, I note the suggested condition requiring the submission of details of a construction environmental management plan, that could include delivery times avoiding periods of congestion on WCR.

*- Parking*

107. The appellant has pointed to the lack of guidance in both the LP and the LBBLP on the appropriate number of on-site car parking spaces for a care

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<sup>31</sup> Table 5.1 of the hearing statement of Ian Wharton, which is Appendix D of the appellant's statement of case.

home. The parking standards suggested in the previous unitary development plan have, therefore, been used by the appellant to calculate that provision of between 15 and 30 spaces would be appropriate to serve the care home, with the addition of 1 to 2 spaces to serve the use proposed in the pavilion. The maximum of this total (32 parking spaces) is proposed at the site. Of these, I note the number of spaces that would be allocated for disabled people and for charging electric vehicles.

108. Notwithstanding the above, the appellant has undertaken a survey of the use of on-site parking at its Heathfield Court care home in Bexley<sup>32</sup>, which has a PTAL to match the appeal site and provides 66 beds. Although only 18 on-site parking spaces are provided at Heathfield Court, the maximum number of spaces used during the period of the survey was 12. It is, therefore, suggested that the calculation using the former unitary development plan parking standards results in an overestimation of the likely need for on-site parking for the proposed development.
109. Having regard to the evidence above, I can only conclude that the proposed parking provision would be more than sufficient to meet the needs of the development as a whole and that it is unlikely that the parking area would be used to capacity. Indeed, I note that the Council's highway engineer has considered the amount of parking provision, but has no concerns in this regard. Reference is, however, made in the consultation response to the provision of overflow parking for BPH.
110. In this regard, at the hearing it was clarified that residents of BPH have a right to use 6 parking spaces within the appeal site for their visitors. Whilst this was not disputed by the appellant, it is suggested that, having regard to the existing parking provision serving BPH, it is unlikely that all 6 parking spaces within the site would be regularly used by visitors to BPH. Indeed, I have had regard to the existing parking provision at BPH and note that it was not suggested that at present visitors to BPH make regular use of the parking provision at the appeal site. Whilst the 6 parking spaces would not be allocated, I have been given no reason to conclude that parking spaces for up to 6 vehicles visiting BPH would not be available at any time once the development is complete and in use. Accordingly, I am still of the view that on-site parking provision would be sufficient.
111. The Council suggest that parking requirements at the site would be greater as a result of the evening and early morning shift start times. However, at the hearing the Council confirmed that it had no objection with regard to the on-site parking provision and that the parking proposed was not inadequate. Despite this, the Council maintained its concerns regarding the inadequacy of the parking survey that had been undertaken on the nearby highway, as referred to in its fourth reason for refusal. However, having regard to the Council's position, that the development would provide adequate on-site parking, I have not considered the Council's concerns with regard to the parking survey.
112. Notwithstanding the above, I acknowledge that interested parties are concerned that the development would result in an increase demand for on-street parking in the vicinity of the appeal site. I particularly note their

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<sup>32</sup> Table 4.1, paragraphs 4.24 to 4.28 and Appendix E of the hearing statement of Ian Wharton, which is Appendix D of the appellant's statement of case.

concerns regarding parking associated with the school, and that the parking survey was undertaken at a time on-street parking was particularly low. I have no reason to doubt that the parking related to the school site causes an inconvenience to local residents and road users, or that highway safety might well be affected by this parking. However, the evidence before me does not lead me to conclude that the development would result in a need for on-street parking or exacerbate any existing problems in this regard.

*– Pedestrian Safety*

113. I note that pedestrian safety on WRC, in particular the section of this highway without a dedicated footway, is a matter of concern for some local residents. I also note the comments of the Council's highway engineer in this regard, although they were not expressed as an objection to the development. Notwithstanding this, I have concluded above that it is unlikely that the development would add to any existing on-street parking problems in the area, including the section of WCR that is without a footway. Added to this, I have also concluded that traffic generated by the development, including pedestrian traffic, would not peak during the morning or evening rush hour, or during the afternoon school closing time. In the absence of any substantiated evidence of detriment to the pedestrian environment, I am unable to conclude that the development would cause an unacceptable degree of harm to pedestrian safety on the local highway network, in particular during the existing periods of congestion on WCR that have been highlighted by the Council and interested parties.

*- Conclusions on Safe and Efficient Movement of Vehicles and Pedestrians*

114. For the reasons given above, I conclude that the development would be acceptable with regard to its effect on the safe and efficient movement of vehicles and pedestrians within the site and on the surrounding highway network. It would not, therefore, conflict with LBBLP Policy 30 (Road Safety), LP Policy 6.3 (Assessing the Effects of Development on Transport Capacity) and Paragraph 109 of the Framework, which do not permit development that would have a significant adverse effect on road safety, an unacceptable impact on highway safety, or an adverse effect on the safety of the transport network. Furthermore, whilst parking standards for the type of development proposed are not provided within either the LP or the LBBLP, having regard to the proposed on-site parking provision, I am satisfied that the development would not conflict with LBBLP Policy 30 (Parking) or LP Policy 6.13 (Parking) which require sufficient off-street parking provision up to a maximum standard, whilst ensuring adequate provision of, amongst other matters, parking for disabled people and for charging electric vehicles.

***Need and Any Other Benefits of the Proposed Development***

115. The appellant identifies the LBB as having the largest ageing population in London, which is set to increase by 20% in 2032. He points to the Council's Older Persons Accommodation Study (2016) that highlights a need to make quality care provision for this population. This is not disputed by the Council.
116. The appellant has also provided two assessments of the current supply of care home beds, which include the existing and future demand for such



accommodation. The first, submitted with the planning application<sup>33</sup> concentrates on provision and demand within a 5 mile radius of the appeal site and concludes that in 2018 there was an under supply of care home beds of some 1,166 and this under supply is likely to increase to 1,551 in 2023 and 1,981 in 2028, assuming bed supply remains the same. The second assessment<sup>34</sup> provided with the appeal looked at provision across the Borough. It refers to the findings of the Care Quality Commission, which suggests that LBB has a total provision of 1,397 registered beds across 34 residential and nursing homes. The appellant indicates that just 1,057 of the registered beds are en-suite bedrooms, and suggests that any provision that is not single occupancy and without an en-suite bathroom would not meet the benchmark in guidance provided by the Department of Health<sup>35</sup>. The assessment of demand suggests that in 2020 2,083 beds were needed in the borough, and that this increases to a need for 2,366 beds in 2025 and 2,671 beds in 2030.

117. The appellant has acknowledged that planning permission has been granted in the Borough for an additional 102 en-suite bedrooms. Despite this, both assessments identify a significant shortfall of care home beds at present and predict an increase in that shortfall into the future.
118. The radius approach taken in the first assessment was criticised in the officer's report and at the hearing it was suggested that there was no reason to discount beds provided in care homes that provided 30 beds or less, as had been done in that assessment. Notwithstanding this, the Council confirmed that there was no dispute with regard to the figures presented by the appellant.
119. Even taking into account the beds currently in care homes that provided 30 or less, the shortfall demonstrated in the first assessment (within a 5 mile radius of the site) would have still been in the region of 599 in 2018, rising to some 1,981 in 2028, assuming supply remains the same. With regard to the second assessment, taking into account all registered care home beds (not just those with en-suite facility) and assuming that the 102 en-suite bedrooms that have the benefit of planning permission in the Borough would be available by 2025, there would still be a shortfall in the region of 867 registered beds. This would rise to a shortfall of some 1,172 registered beds in 2030, again assuming there is no other provision. I consider the shortfall, however it is presented, to be significant.
120. Added to this, the appellant has pointed to the current need for 47% of LBB's care home placements to be accommodated outside of the Borough<sup>36</sup>. This is compared to a figure of 25% in Bexley<sup>37</sup> and 4% in Croydon. Again, this is not disputed by the Council.
121. Having regard to the evidence before me, it has been demonstrated that there is a significant need for care home provision both within the Borough and within a 5 mile radius of the appeal site. This need is only likely to be greater

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<sup>33</sup> The Cushman and Wakefield Demographic Needs Analysis dated 16 April 2019.

<sup>34</sup> The witness statement of Nigel Newton Taylor, which is Appendix A of the appellant's statement of case.

<sup>35</sup> Part 3 of witness statement of Nigel Newton Taylor, which is Appendix A of the appellant's statement of case.

<sup>36</sup> Table on page 20 of the witness statement of Nigel Newton Taylor, which is Appendix A of the appellant's statement of case.

<sup>37</sup> Update of the table on page 20 of the witness statement of Nigel Newton Taylor given at the hearing.

in the future. The provision of 60 beds to the stock of registered care home beds would, therefore, be a significant benefit of the scheme.

122. With regard to the other suggested benefits, the proposed use of the pavilion building would contribute to healthcare provision in the community, which would benefit the community's health and social wellbeing. The Council acknowledges the number of full time jobs that would be created, amounting to 60 full time equivalent employment opportunities. The evidence indicates that many of the opportunities would be taken up by residents local to the area<sup>38</sup>. This would be in addition to the jobs created during construction, although these would only be for the duration of the construction period. Nevertheless, the total employment resulting from the development would be a considerable economic benefit of the scheme.
123. At the hearing it was suggested that at the other appellant's care homes food that is prepared on site is sourced from local shops and that the same approach would be taken at this site. Furthermore, the appellant also indicated that such services as hairdressing and chiropody would also be sourced from the local area. These are further benefits of the scheme that would be felt by the local economy.

### ***Housing Land Supply and Paragraph 11b of the Framework***

124. The Council confirmed at the hearing that accommodation to be provided within care homes is included in the calculation of the Council's supply of housing land. It is common ground that the Council are unable to demonstrate that it has a 5 year supply of housing land, as required by paragraph 67 of the Framework. Whilst the appellant suggested that the current supply might be as low as 1.7 years, the figure agreed at the hearing by both parties was 3.31 years, which is nevertheless substantially below the requirement for a 5 year supply. It is, therefore, common ground that the provisions of paragraph 11 d) and footnote 7 are engaged.
125. I have concluded that the only policies that would stand in the way of the provision of 60 care home beds proposed in this case, and against which I have identified conflict, are LBBLP Policy 55 and LP Policy 7.18. Whilst I consider these policies to be in accordance with the Framework, as the Council cannot demonstrate a five year supply of deliverable housing sites, these policies are considered to be out-of-date for the purposes of paragraph 11(d). I must, therefore, weigh the benefits of the development proposed against its adverse impacts, assessing these against the policies in the Framework.
126. I have identified a considerable shortfall in care home accommodation at present and the likelihood of this increasing in the future. I have, therefore, identified the provision of 60 care home beds as a significant benefit of the scheme. Added to this are the considerable social and economic benefits, which include job creation and healthcare provision in the community. These benefits achieve two of the objectives of sustainable development as identified in the Framework.
127. Balanced against this, I have identified conflict with certain policies of the development plan that seek to protect open space. These policies have the

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<sup>38</sup> Paragraph 4.4 of the witness statement of Nicola Coveney, managing director of Carebase Limited, which is Appendix C of the appellant's statement of case.

support of the Framework. However, I have only identified moderate harm resulting from this conflict, having regard to the effect of the development on the openness of the area of UOS and the surrounding residential environment.

128. In this case, whilst I have identified adverse impacts of the development, these do not significantly and demonstrably outweigh the benefits of the scheme, when assessed against the policies in the Framework taken as a whole. In these circumstances paragraph 11 d) advises that planning permission should be granted. This is a material consideration in the determination of this appeal.

### ***Other Matters***

129. In addition to the considerable support for the development, there is also substantial objection. Many of the points raised have been considered already in this decision. I now consider the remaining matters that have been raised by interested parties.
130. With regard to the concern for the effect of the development on local wildlife, I have had regard to the preliminary ecological appraisal survey and the ecological mitigation plan that accompanied the application. These conclude that, subject to the implementation of recommended mitigation measures and enhancement, the development would not have an adverse effect on wildlife, protected species, or habitats. This conclusion is not disputed by the Council and both parties were in agreement with regard to the need for a condition requiring biodiversity mitigation and enhancement. I have no reason to reach a different conclusion on this matter. I also note the proposed landscaping scheme for the site and the minimal effect the development would have on existing trees.
131. I have no supporting evidence before me to suggest that the development would result in an adverse effect on the security of adjoining properties. Indeed, it is more likely that an active use of the site would deter any criminal activity. Whilst the officer's report confirms that the site is north of an area of archaeological significance, there is no suggestion that the development would have an adverse effect in this regard. The Council has not suggested that the site has been earmarked or designated as land to accommodate further playing fields for the adjoining school. Finally, the maintenance of the access to the site is a matter for the landowner and those with an interest in the land to address; it is not material to the determination of this appeal.

### ***Planning Obligation***

132. I have been provided with a compliance statement<sup>39</sup> which sets out the policy support for the planning obligations contained within the UU. Having regard to this, I am satisfied that the health contribution within the UU accords with the Planning Obligations Supplementary Planning Document dated December 2010. As such, the development would make the appropriate contribution towards health facilities in the area, in accordance with LBBLP Policy 26 (Health and Wellbeing).
133. Turning to the Bowls Club Contribution, my conclusions with regard to the loss of the outdoor sports facility are balanced, and were reached despite the recognised community benefits of such facilities and policy support for its

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<sup>39</sup> HD09 - The Section 106 and CIL Regulations Compliance Statement.

retention. I am, therefore, satisfied that the contribution is necessary to make the development acceptable. Notwithstanding this, as the distribution of the contribution would be controlled by Bowls England and not the Council, there was some considerable discussion during the hearing regarding the mechanism for ensuring that it would benefit bowls clubs in the Borough. Having regard to the status of Bowls England and their purpose, I am satisfied that the contribution would be distributed where needed in the Borough, in accordance with the Bowls England letter dated 24 August 2020<sup>40</sup>.

134. Overall, the contributions required by the UU would be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development, in accordance with regulation 122 of The Community Infrastructure Levy Regulations 2010 as amended.

### **Conditions**

135. The conditions set out in the accompanying schedule are based on those suggested by the main parties in appendix 3 of the SOCG. Where necessary I have amended the wording suggested in the interests of precision and clarity in order to comply with advice in the Planning Practice Guidance: Use of Planning Conditions. The pre-commencement conditions were also discussed and agreed by the parties during the hearing.
136. I have allowed the appeal on the basis that there is an identified need for the care home proposed. The condition limiting the use of the building is, therefore, necessary to ensure that the development would contribute towards the shortfall identified. For the sake of precision and for the avoidance of doubt I have used the description of the Class C2 use as provided in Class C2, Part C of Schedule 1 of the Town and Country Planning (Use Classes) Order 1987 as amended (UCO). This would include both nursing care and dementia care, as referred to in the Council's suggested condition. I have not included the suggested age limit of residents as the appellant indicated that there may be a small number of those needing dementia care under the age of 65.
137. Having had regard to the Council's concerns in respect of the effect of the proposed use of the pavilion building on the living conditions of nearby residents, to my mind a condition limiting its use to the provision of medical or health services would be more effective in limiting any adverse effects than a condition limiting the hours of operation, as suggested by the parties. The limited use is likely to only occur during daytime hours and the condition would allow the Council to prevent other uses that fall within Class E, Part A, Article 3 of Schedule 2 of the UCO that might have a more harmful effect on nearby residents. A condition requiring obscure glazing and limiting the use of the rear door in the pavilion building is also necessary in the interests of the living conditions of residents of BPH.
138. A construction management plan that deals with both environmental and transport matters would be necessary to ensure the construction process would have a limited effect upon the safety of highway users and living conditions of neighbours.

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<sup>40</sup> HD20 - Bowls England Letter dated 24 August 2020.

139. The protection and enhancement of the landscaping of this development together with details of hard landscaping, site levels and slab levels are essential in the interests of good design, the living conditions of nearby residents and preserving the contribution that is made by existing trees on site and near the site. For this reason the conditions relating to these matters are necessary. As is the requirement for details of sustainable drainage and means of hard surfacing, as well as the implementation of the Energy and CO2 Reduction Strategy, in the interest of the environment and to prevent flooding.
140. Completion of the parking, turning areas, cycle store, and bin store prior to the occupation of the development would be necessary to ensure there would be sufficient provision for the development's residents, staff and visitors.
141. Whilst I note the appellant's comments in respect of the need for suggested condition 17, I have had regard to the aspects of site security that the Metropolitan Police Service suggest should be considered in this type of development. I am, therefore, satisfied that the condition requiring details of measures to reduce the risk of crime is necessary in the interests of creating a safe and secure environment for residents, staff and visitors.
142. I have had regard to the biodiversity information already provided with the planning application, however details of how the recommendations in the preliminary ecological appraisal survey and the ecological mitigation plan are to be implemented on site are necessary to ensure both the mitigation and enhancement of biodiversity are achieved on site. A condition requiring the submission and implementation of these details would be in the interests of contributing to and enhancing the natural environment<sup>41</sup>. A condition requiring the submission and implementation of a final version of the travel plan is also necessary in the interests of minimising staff and visitor's reliance on less sustainable modes of transport.
143. The recommended condition 11 is not necessary as the erection of any external plant, equipment or machinery is likely to require the benefit of planning permission in any event. Similarly, details of materials are already provided within the approved drawings, negating the need for the suggested condition 8. I was not given any reason for the suggested condition 16 and cannot envisage a need for the car park to be managed, particularly as access to the site is controlled.

### ***Planning Balance***

144. Section 38(6) of the Planning and Compulsory Purchase Act 2004 indicates that if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be in accordance with the plan unless material considerations indicate otherwise.
145. I have found that the development fails to accord with the development plan as it would result in built development on an area of designated UOS. However, for the reasons given earlier in this decision I have concluded that the Framework's presumption in favour of sustainable development as defined in paragraph 11 d) applies in this case. This is a material consideration of

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<sup>41</sup> Paragraph 170 a) of the Framework.

sufficient weight in this case to indicate that the appeal should be determined otherwise than in accordance with the development plan.

**Overall Conclusion**

146. For the reasons given above, I conclude that the appeal should be allowed.

*J Moss*

INSPECTOR

## **APPEARANCES**

### **FOR THE LOCAL PLANNING AUTHORITY:**

David Bord BA(Hons) PGDip London Borough of Bromley

### **FOR THE APPELLANT:**

Jonathan Clay	Barrister, Cornerstone Barristers
David Fletcher MRTPI	Director, Strutt and Parker
Ian Wharton MCIHT	Associate, Ardent Consulting Engineers
Nigel Newton Taylor MRICS	Director, Healthcare Property Consultants
Nicola Coveney	Managing Director, Carebase Limited
Mike Hirsch	Property Director, Carebase Limited
Ruth French RIBA	Associate, Ryder Architecture
Adrian Tutchings MRICS	Linays Commercial
Sav Patel MRTPI	Associate Director, Strutt and Parker

### **INTERESTED PERSONS:**

Tom Whild MRTPI	Associate, Ken Parke Planning Consultants on behalf of residents of Burton Pynsent House
Nigel Springer	Observer
Mrs. Ayako Salamon	Observer
Alan Woolston	Observer
Tom Woolston	Observer
Andrew Costa	Observer
R. E. Russell	Observer

### **HEARING DOCUMENTS**

- HD01 - Planning Obligations Supplementary Planning Guidance dated December 2010
- HD02 - Email chain from former Hayes Bowls Club – last email dated 16 September 2019
- HD03 – London Borough of Bromley Local Plan Background Paper – Local Green Space dated September 2016.
- HD04 – letter from former occupiers
- HD05 – London Borough of Bromley Open Space, Sport and Recreation Assessment dated 2017
- HD06 - Email from the appellant dated 3 October 2019 – change of description of the application.
- HD07 - Correspondence submitted by the residents of Burton Pynsent House.
- HD08 - Plan submitted by residents of Burton Pynsent House entitled 'Boundary Survey with Ordinance Survey Overlay' dated November 2016.
- HD09 - The Council's Section 106 and CIL Regulations Compliance Statement

- HD10 - Email from Adrian Tutchings dated 9 December 2020 – Additional information regarding the marketing exercise.
- HD11 - Report on the Examination of the Bromley Local Plan dated 11 December 2018.
- HD12 - London Borough of Bromley Submission Local Plan 2017 – Consultation Statement (Regulation 22 (c))
- HD13 - London Borough of Bromley Development Control Committee Report dated 28 June 2012 – Review of Green Belt, Metropolitan Open Land and Urban Open Space Boundaries.
- HD14 - London Borough of Bromley - Housing and Mixed Use Site Assessments 2017
- HD15 - London Borough of Bromley - Draft Local Plan Representations 1 to 20
- HD16 - Bromley Proposed Submission Draft Local Plan consultation 2016 - Summary of Responses June 2017 - Part 4 – contents
- HD17 - London Borough of Bromley - Draft Local Plan representation from Bespoke Senior Leisure Limited dated 15 November 2017
- HD18 - London Borough of Bromley - Draft Local Plan Bespoke Senior Leisure additional hearing statement.
- HD19 - Site Visit Itinerary.
- HD20 - Letter from Bowls England dated 24 August 2020.



## Schedule of Conditions

1. The development hereby permitted shall be begun before the expiry of three years from the date of this permission.
2. The development hereby permitted shall not be carried out otherwise than in complete accordance with the following plans:
  - HAYES-RYD-00-ZZ-DR-A-1001-S2-P6
  - HAYES-RYD-ZZ-00-DR-A-1002-S2-P5
  - HAYES-RYD-ZZ-BA-DR-A-3001-S2-P7
  - HAYES-RYD-00-GF-DR-A-3002-S2-P7
  - HAYES-RYD-00-01-DR-A-3003-S2-P7
  - HAYES-RYD-00-02-DR-A-3004-S2-P7
  - HAYES-RYD-00-RF-DR-A-3005-S2-P7
  - HAYES-RYD-00-XX-DR-A-0402-S2-P1
  - HAYES-RYD-00-ZZ-DR-A-3601-S2-P1
  - HAYES-RYD-00-ZZ-DR-A-3602-S2-P1
  - HAYES-RYD-00-ZZ-DR-A-3801-S2-P1
  - 12300 - Landscape General Arrangement
3. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any Order revoking and re-enacting that Order, with or without modification, the building labelled A, B and C on the plan number RYD ZZ 00 DR A 1002 Revision P5 - Proposed Site Plan shall not be used for any purpose other than for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses)) or as a nursing home.
4. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any Order revoking and re-enacting that Order, with or without modification, the building labelled Existing Pavilion on the plan number RYD ZZ 00 DR A 1002 Revision P5 - Proposed Site Plan shall not be used for any purpose other than for the provision of medical or health services, principally to visiting members of the public.
5. No development shall commence until a scheme for the provision of sustainable urban drainage has been submitted to and approved in writing by the Local Planning Authority. The drainage shall be completed in accordance with the approved details prior to the occupation of the development and shall thereafter be retained as approved.
6. No development shall commence until details of the existing site levels and the proposed slab level of the building have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.
7. No development shall commence until such time as a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include:

- Dust mitigation and management measures;
- The location and operation of plant and wheel washing facilities;
- Measure to reduce construction noise;
- Hours of construction;
- Hours of delivery to the site ensuring these avoid the morning and evening rush hour and the end of the school day during term time;
- Full contact details for the site management office; and
- Details of construction traffic movements, which shall include:
  - Rationalise travel and traffic routes to and from the site, as well as within the site;
  - Measures to ensure safe pedestrian movement;
  - Parking areas for construction workers; and
  - A swept path drawings for the site entrance on West common Road.

The development shall be carried out in accordance with the approved CEMP.

8. Notwithstanding the submitted details, no development shall commence until details of biodiversity enhancement have been submitted to and approved in writing by the Local Planning Authority. The details could include, but are not limited to, bat and bird boxes and bricks; bee bricks; and measures for hedgehogs and badgers. The approved details shall be implemented and completed prior to the occupation of the development and shall thereafter be retained as approved.
9. No development shall commence until details for the protection during construction of all existing trees on site and adjoining the site have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.
10. Notwithstanding the submitted details, no development shall commence until a scheme of all hard and soft landscaping has been submitted to and approved in writing by the local planning authority. The scheme shall include details of:
  - all hard surfacing, which shall either be constructed using porous materials or shall drain to a permeable or porous area or surface within the site;
  - existing and proposed ground levels on the site;
  - all means of enclosure;
  - all existing trees, hedgerows and other planting, identifying those to be retained;
  - a planting specification to include numbers, density, size, species and positions of all new trees, shrubs and other plants; and

- a programme of implementation.
11. All planting, seeding or turfing comprised in the approved details of soft landscaping shall be carried out in the first planting and seeding seasons following the occupation of the building or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
  12. Prior to the occupation of the development hereby permitted all hard landscaping shall be completed in accordance with the approved details of hard landscaping.
  13. Prior to the occupation of the development hereby permitted the access, turning space and vehicle parking shall be laid out and completed in accordance with the approved details. These areas shall thereafter be retained in accordance with the approved details and shall not be used except for access, parking and manoeuvring of vehicles in connection with the development hereby permitted and visitors to BPH.
  14. Prior to the occupation of the development hereby permitted the refuse and recyclable materials storage area shall be completed in accordance with details that shall first have been submitted to and approved in writing by the Local planning Authority.
  15. Prior to the occupation of the development hereby permitted the cycle storage area shall be completed in accordance with details that shall first have been submitted to and approved in writing by the Local planning Authority.
  16. Notwithstanding the submitted details, prior to the occupation of the development hereby permitted a travel plan shall be submitted to and approved in writing by the local planning authority. The development shall thereafter be occupied in accordance with the approved travel plan.
  17. Prior to the occupation of the building labelled Existing Pavilion on the plan number RYD ZZ 00 DR A 1002 Revision P5 - Proposed Site Plan, the door in the south facing elevation of this building shall be obscurely glazed in accordance with details that shall first have been submitted to and approved in writing by the local planning authority. Once installed the obscured glazing shall be retained thereafter and the door itself shall only be used in an emergency.
  18. The development hereby permitted shall be completed in accordance with the Energy and CO2 Reduction Strategy dated January 2020 and shall incorporate in particular the measures set out in section 3 and 5.2 of the strategy.

**\*\* Conditions End \*\***

# APPENDIX 6

# Housing Strategy 2020-2025



## Leader's Foreword

We are living in uncertain times, but what remains true is that Bexley is a very attractive and safe place to live.

Over 70% of Bexley residents own their own home and more aspire to do so; we want to help our residents achieve this ambition. People have come to live and work in the borough for generations, to enjoy our award-winning parks and open spaces, great schools and to take advantage of our riverside locations, bustling town and village centres and pleasant neighbourhoods as well as good links to both London and Kent, major airports, the Channel rail tunnel and ports.

The pandemic has prompted people to re-evaluate what is important to them. We know from media reports and stakeholder feedback that there is an increasing appeal of neighbourhoods away from the city centres and close to parks and open spaces. Bexley has a wealth of attributes that make it increasingly popular for first time buyers and others seeking to put down roots here.

These undoubted strengths make Bexley a great place to live and settle but also bring challenges which we are committed to address: a rising and changing population, increasing cost and demand for homes both to rent and buy, financial constraints and the need to ensure our borough thrives and grows in a sustainable way in line with our growth strategy.

This Housing Strategy was announced as part of the 2019 budget process as we felt we needed to understand the types and volume of housing our borough, residents and future residents will need – mindful of expanding families, our young people growing up, our older people wanting to move to smaller homes in our community or indeed to welcome new people to our borough.

We will review the opportunities that may arise from the Government's review of the current planning system, and together with our Local Plan this insight will help us understand and plan for future need.

Our Council does not have housing stock so meeting the future needs of our residents will mean delivering through others such as registered housing providers or developers, and therefore close relationships and sharing our vision and plan is key to the success of this strategy.

The last few months has made us appreciate the importance of our homes and what Bexley has to offer making this work more important than ever and, working together, I'm sure we can make Bexley an even better place to live.

**Councillor Teresa O'Neill OBE**

**Leader, London Borough of Bexley**

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## Executive Summary

This Housing Strategy is being published, subject to adoption, in the context of the 2020 COVID pandemic noting that, despite extensive mitigation measures put in place by central government, this has placed an unprecedented strain on the economy, health and well-being of the country. As we come to terms with a 'new normal', former assumptions and modelling will need to be looked at anew in terms of the homes we need to build, their tenure and the prioritisation of access to them. Our Housing Strategy must be sufficiently flexible to be able to respond to new demands but also to opportunities.

As set out in our Growth Strategy adopted in 2017, London Borough of Bexley will play a key part in helping London grow sustainably while we continue to respect the borough's overall character and identity. We have a key role in place-shaping and to ensure that our communities, new and old, are connected, happy and prosper. We already have regular train services, including Thameslink who operate services between Bedford and Brighton via Luton and Gatwick airports, that run into London and out to Kent with Crossrail services due to commence in 2021. We are also in easy reach of the channel tunnel and south coast ferry ports. More public transport, both within and beyond Bexley, is key to securing the scale of growth that will ensure all our residents benefit from a good quality of life and improved wellbeing, supported by high quality housing, rewarding employment opportunities and effective local services and facilities. But we also know that, in the short term at least, flexible work patterns will continue and how we travel including to work, will change.

Bexley has always been a place where many of our residents have achieved their aspiration to buy their own home. Owner occupation levels are high in Bexley compared to the rest of London. We recognise that access to affordable, decent housing is fundamental in supporting the health, resilience and aspiration. We also know that it has become increasingly challenging to address the demand for affordable housing in Bexley, in London and in the wider South East not just to buy but to rent as well.

We are one of only four London boroughs (the others being Bromley, Richmond upon Thames and Merton) who do not have their own housing stock or a Housing Revenue Account. Bexley cannot deliver new housing directly making it even more important that we work closely and effectively in partnership to address our housing needs; the Council cannot meet this challenge alone.

BexleyCo Homes, the Council's wholly owned development company, is helping the Council to deliver its vision for housing in Bexley with an agreed strategy of delivering 1,200 exemplary new market and affordable homes over the next 10 years with the ambition to increase to 2,500. This means BexleyCo Homes has the potential to make a significant contribution to the Council's annual housing targets, and the Council has the ability, as Shareholder, to secure a higher level of affordable housing than would necessarily be achievable through planning powers.

Bexley is committed to meet its draft London Plan housing target (currently set at 685 per year, with 305 of those new homes expected to be delivered from small sites across the borough). With 48% of land in the borough designated residential and 38% designated as open space and employment land, there are limitations on the locations that are appropriate for new homes built at higher scale and density. Our



Growth Strategy provides the necessary clarity for developers on where we believe this development is appropriate.

Despite these evident constraints, the Council continues to identify sufficient housing sites to meet its land supply requirement however we know that the supply, nationally, regionally and locally is not keeping pace with demand. As the country emerges from the pandemic this situation is likely to become more complex, and variable across London, regionally and nationally with the impact and recovery period for household economies currently unknown. Bexley welcomes the ambition of the Government to improve the effectiveness of the current planning system but there are concerns about the potential loss of local control and the impact that some of the details would have on the Council's ability to properly plan to secure sufficient levels of homes including affordable housing.

Although uncertainty prevails, this Strategy seeks to ensure our current partners and those who may wish to invest here, are clear about the Council's housing objectives over the next five years. It highlights the critical importance of central government, the Greater London Authority (GLA), Registered Providers (RPs) and developers in helping us secure maximum levels of grant funding to deliver more affordable homes to buy and rent, to build the business case to release employment land for housing, lobby for the right levels of infrastructure, particularly transport in the areas of housing growth and have robust systems in place to ensure we help the people who need our help the most.

We are clear we need sustainable housing growth with new developments delivering a mix of tenures that meet housing needs of all age groups and incomes and deliver the right infrastructure in the right places to deliver successful communities.

We will continue to be clear about the type and location of the housing we need. Our plans will remain strongly evidence based. As London and the wider South East continues to experience major demand for new homes, we remain ready to play our part in meeting this demand, but we can only do this with the right supporting infrastructure in place to stimulate the necessary quality development. We look forward to the planned commencement of Crossrail services from Abbey Wood and to developing the business case to improve connectivity and to extend Crossrail 1 across our borough to Ebbsfleet.

We will continue to support our partners in lobbying for grant funding both for general needs and specialist housing and consider ways we can enable the delivery of homes more quickly, for example by using cash in lieu payments and exploring the potential of Modern Methods of Construction (MMC) including modular and off-site construction in good, accessible locations. We also help developers to be more confident their schemes can be successful by providing an excellent pre Planning Advice Service and we will use our Compulsory Purchase Order (CPO) powers where it is right to do so.

We know the Private Rented Sector (PRS) has become increasingly important and while we do not know what the short-term impact of COVID will be, we expect this sector to continue to grow. In 2018 14% of households in the Borough were renting privately and we anticipate this figure is now higher. A well-run PRS plays a healthy role in providing housing options so our Strategy addresses working with private sector landlords to increase the supply of private rented homes available and to maintain and improve housing standards via a licensing scheme.

We want, wherever possible, to avoid homelessness and have invested in providing directly and through third parties effective homelessness prevention services that meet the requirements of the Homelessness Reduction Act 2017. This has never been more important. We are looking at how our front-line staff can achieve even more effective prevention for clients presenting as homeless by arranging for them to access alternative private rented accommodation.

This is already achieved through a contract with a credit union who have agreed to offer loans for rent in advance and deposits. But we are always looking for ways to do more. We have recently let a contract with a local homeless charity to provide a mediation and support service for those who are threatened with eviction from the family home. This will support clients to remain or to find alternative private rented accommodation and, with our partners continue to put additional plans in place to address housing demand, maintain existing tenancies and provide early housing advice, guidance and support to our residents as long as its required. We know that coming weeks and months will be hard for many and we will be doing all we can to ensure residents can access strong financial advice to enable them to retain their homes be they rent or mortgage payers.

We will continue to ensure we have the right data, so we can be clear about current and future housing needs, in particular for those who are most vulnerable due to age, disability, mental capacity or young people leaving our care.

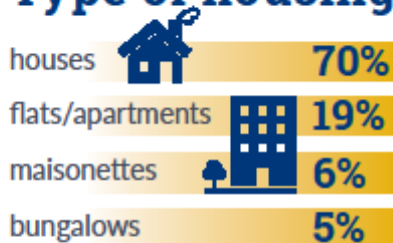
Our plans will remain strongly evidence based, partnership led and rooted in our clear ambition for quality, affordable homes for all.

## Illustrative Housing Facts for Bexley



New affordable homes delivered by Bexley's RP partners over 5 years

### Type of housing



**83%** increase in households living in temporary accommodation in past 5 years



Average monthly rent 2 bed



**22%** increase in households living in private rented accommodation



Population will increase by **21%** by 2050



## Introduction

Bexley has traditionally been a place where many of our residents have achieved their aspiration to buy their home. The majority of the housing stock is owner occupied, although this percentage has decreased in recent years as the private rented sector has grown reflecting national trends. **Three-bedroom houses currently represent 46%<sup>[1]</sup>** of the total housing stock in Bexley with flats representing nearly 26%<sup>1</sup>. Most of the housing stock in the borough was built between 1919 and 1944.

Owner occupation levels are high compared to the rest of London but, like our neighbouring boroughs, we have seen changes in how these homes are used with an increase in the private rented sector. This has led to some of our existing housing stock now being used more intensively.

Bexley has around 14,000 social housing units managed by Registered Providers (RPs). We do not own or manage our own housing council stock as, in 1998, the stock was transferred to two housing associations; Orbit and L&Q. This means that, unlike almost every other London Borough, we cannot directly deliver estate regeneration to increase the delivery of additional homes and directly improve the condition of the borough's existing social housing stock.

The three largest stock holding RPs in Bexley today are Peabody, Orbit and L&Q. We also have a range of smaller providers that we currently and will continue to work with to expand their programmes in the borough. We are also keen to attract new providers.

Pressure on housing in Bexley is set to continue into the foreseeable future. In common with other boroughs we have significant homelessness pressures alongside a shortage of suitable private rented accommodation and reducing affordability. Developing affordable homes can be problematic in Bexley due to viability issues caused by lower land values and the ability of market sales to cross subsidise London Affordable Rented homes. Housing pressures will be exacerbated further in the short to medium term by the impact of the COVID pandemic on employment, health and well-being. We will use the tools within our enhanced performance management culture so that we are more resilient in the face of such challenges. We will estimate future trends based on demographic and other key data and monitor cost variables. We will also track the economic and social change engendered by the pandemic and review modelling assumptions on affordability and need.

In terms of our age profile, the biggest single increase is expected in the 0-15-year-old cohort, however we know, as well as families, **we need homes for care leavers and the housing needs of an ageing population need to be carefully considered too** as we currently have no Extra Care schemes while a number of sheltered housing sites are tired and increasingly unpopular.

Given this, despite such uncertain times, it is critical the Council maintains its primary role in creating, shaping, sharing and communicating a vision for housing in Bexley. Continuing to work proactively with our

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<sup>[1]</sup> 2019 VOA

key partners, including central government, GLA, TfL, RPs and private developers, we will maintain the long-term relationships necessary to encourage and deliver housing growth. We will market and promote the borough, coordinate input and bring people together to identify and realise development opportunities and lever in the additional investment and funding required to meet our residents changing housing needs. We will also reach out to new investors keen to build here.

We will work hard to support our partners in making the case for securing maximum levels of grant funding to deliver more affordable homes for rent and to buy. These homes will be delivered in developments of mixed tenure communities and provide a variety of housing products that meet our residents changing housing needs and aspirations across ages and incomes. We will identify, understand and respond to individuals who require homes specific to needs associated with age, health, disability and levels of vulnerability.

Our aspiration for clients with learning disabilities who have eligible needs under the Care Act, is to enable people to live independently in the community in either supported living arrangements or at home with support. People with learning disabilities live all over the borough and opportunities to develop an affordable element, for people with Learning Disabilities, should be considered in all new housing development/re-development, thus contributing to achievement of the 50% affordable housing target. Consideration within the housing schemes should give preference to the recommendations provided by the Learning Disability Partnership Board and the organisations represented within the board who consulted with people with learning disabilities and their carers. Issues such as easy bus routes and locations near amenities, areas with good street lighting and other environmental factors were crucial when considering the location of schemes to incorporate housing to serve the needs of people with learning disabilities.

Schemes such as My Safe Home which offer shared ownership opportunities to people with a Learning Disability should be promoted to enable people to take up accommodation around the borough. For people who can live independently with the support of schemes such as Circles of Support, groups in apartments which are co-located are ideal, allowing people to have their own home with accessibility of friends with similar needs.

Availability of appropriate accommodation and housing is fundamental to meeting the needs of people with mental health needs in the community, avoiding admission to hospital, facilitating discharge and enabling recovery. The aim of health and social care will always be to support people with mental health needs in the least restrictive setting using the resources available in the individual's personal networks and the local community to prevent escalation and aid recovery.

This requires a range of housing solutions including:

- Step up/crisis supported housing
- Step down supported housing
- Specialist rehab supported housing

- Long term supported housing
- Floating support in own home

There is currently an over reliance on often high cost residential placements, a number of which are out of borough, which could be reduced by availability of a wider range of accommodation locally in which people could be supported more.

We already help young adults leaving care to live wherever will be most positive for them. This includes staying with their previous foster carers (known as Staying Put), accessing their own tenancy, preparing for a tenancy in the private sector or semi-independent accommodation with support provided. Some young adults leaving care will return to their family or family network and we encourage and support them to develop links with their family network where these may have been disrupted over time. Where young people do return to their family we continue to support them as we would any other young adult leaving care. There continues to be significant pressures arising from an increase in the numbers of care leavers and the associated demand for safe and 'homely' one bed properties with appropriate support. Our Leaving Care team will continue to work closely with housing services colleagues to properly assess young people and their ability to fully manage a tenancy, providing the appropriate level of support to achieve this and to sustain their tenancy. As 'Corporate Parents,' we will work with a range of providers to ensure that there is a broad menu of housing options for our care leavers based on their need and readiness to live independently. Good work is already taking place in relation to tenancy allocation and support so that young people who are ready to live independently are allocated a Housing Association tenancy.

The overarching aim of our Housing Strategy for older people is to enable them to feel safe and secure in a place they consider to be home, living independently for as long as possible and connected to a local community and network of social support. Residential care should be a last resort and situations where decisions about long term care are made in a crisis (e.g. from a hospital bed) should be prevented. To enable this there needs to be a much wider range of housing options for older people than currently exists in Bexley. This includes everything from housing adaptations and assistive technology solutions to enable people to stay in their own homes, to a modern high-quality sheltered accommodation offer, to extra care housing with communal facilities and 24-hour concierge service. Options need to be available across the borough recognising that people do not necessarily want to uproot themselves from their familiar community and that retaining support networks are a protective factor in preventing loneliness and isolation. To accommodate the needs of older people from various socio-economic groups, housing needs to be of mixed tenure, for sale (affordable), social or private rental and needs to allow for single adults, couples and other configurations of friends/siblings etc who may choose to live together in old age. The option of multi-generational living should also be explored with properties which can accommodate several generations of the same family.

The strategic approach to housing provision for people with physical disabilities should be on a rights based, social model which ensures that the built environment is designed to avoid the barriers which prevent disabled people from living, working and socialising in the same way as everyone else. As for all vulnerable adults and adults with additional needs, housing for people with physical disabilities needs to be fully

integrated in the community with the emphasis on ensuring that people are enabled to live independently for as long as possible. Availability of adapted housing, or access to support to adapt existing housing is key to enabling care and support to be provided in the community delaying or preventing the need for residential care. Clearly when people have physical disabilities, including necessitating the use of mobility equipment, ease of access to the accommodation, and from their accommodation to public transport routes is critical. Accommodation needs to be in areas where people are more likely to have networks of friends and family, and are close to shops, services and transport interchanges. In this context, the Council's Growth Strategy and emerging Local Plan has identified the need to focus new development in the most sustainable locations, close to existing public transport hubs and everyday facilities.

The Housing Strategy aligns with the Borough's Corporate Plan, Growth Strategy and complements other strategic plans including the emerging Local Plan. The evidence base for the Strategy includes the data from across the Council, partners and the Strategic Housing Market Assessment (SHMA) which identifies the scale and mix of housing in the Borough and unmet need.

Whilst the Strategy is unlikely to change fundamentally over the course of its life, national policy changes and funding opportunities will require flexibility and we will respond. We will put in place a 5-year Delivery Plan with our partners which will be reported on and refreshed annually. The Delivery Plan (Appendix 1), will be based around the four key themes of the Strategy which are:

1. Theme 1 – Working with Partners
2. Theme 2 – Council's Policies
3. Theme 3 – Council's Data and Performance
4. Theme 4 – Resident Offer

These themes and emerging priorities will be subject to formal consultation over the Summer of 2020 before the Strategy is revised and formally agreed.

## Theme 1 – Working with Partners

1. The Council can only support delivery of this strategy and the housing we need by building even closer and effective partnerships with our current providers and those who might wish to invest here. We are an enabler and champion of sustainable development.
2. We will continue to work in partnership with central government, GLA, TfL, RPs, BexleyCo and private developers to promote Bexley as a good place to develop and deliver new, quality homes. Through strong and effective partnerships, we want to increase the number and pace of delivery of new affordable homes to buy or rent and to maximise the use of our and our partners financial assets and resources to make this happen. We want to agree with our partners how we can best do this.
3. The Housing Strategy aligns with the delivery of the Bexley's Growth Strategy with its long-term ambitions and focus on spatial planning, influencing and shaping physical growth across a 30-year time horizon until 2050.
4. The delivery of the Growth Strategy is dependent on the release of employment land for housing which is heavily influenced by national and regional planning policy and the provision of the right levels of infrastructure, in the right locations. The scale of the Growth Strategy is propositional and dependant both on the release of Strategic Industrial Land and formally securing funding for infrastructure delivery.
5. To achieve this, we will continue to work with key partners to support an ongoing, well evidenced, well supported business case which supports the release of employment land in Bexley so that we achieve our long-term growth ambition. An industrial land strategy, alongside other evidence, is being prepared to support some changes to land use designations in the Local Plan, which focuses on the first 15 years of the Growth Strategy.
6. We are already working with key partners to develop a business case to support the delivery of the strategic transport infrastructure required to deliver the ambitions of our Growth Strategy. In support of building this the Ministry of Housing Communities and Local Government has granted the Crossrail to Ebbsfleet (C2E) Partnership, led by London Borough of Bexley, £4.85m to progress a Connectivity Study, looking at options for improved transport connections between Abbey Wood through Bexley to Ebbsfleet to support sustainable housing and jobs growth.
7. The C2E partnership was formed in 2015 to promote the eastward extension of the Elizabeth Line from Abbey Wood and incorporates London Borough of Bexley, the GLA, TfL, Kent County Council, Dartford Borough Council, Gravesham Borough Council, Ebbsfleet Development Corporation, Network Rail and Thames Gateway Kent Partnership. London Borough of Bexley is the accountable organisation for the grant.
8. This important connectivity study is expected to report in September 2021 and will consider a range of different connectivity options and combinations including a Crossrail extension, heavy rail improvements, the introduction of bus transit and DLR extension. The output will be an enhanced strategic outline business case setting out the additional homes and jobs each option would generate



and the associated cost benefit ratio in an effort to identify preferred options to take forward for further development via an outline and final business case. There will be a consultation process as part of the C2E Study with key partners.

9. The Council has recognised the need for and invested in delivering more housing in the borough by setting up BexleyCo, a wholly council owned company. BexleyCo has an aspiration to deliver 1,200 exemplary new market and affordable homes over the next 10 years We will, through our Shareholder role ensure they know our housing need, meet their business plan targets and deliver affordable, quality homes.
10. Our RPs make a key contribution to building and supporting communities, managing existing social housing stock and providing new homes. Our track record and some of the examples given below show how our strong relationship and effective working has delivered real successful change. We are therefore confident that we can achieve more together. We recognize that our RP partners have the potential, the capacity and capability to deliver more of the needed new homes that the borough requires now and in the future.
11. We also recognise that there are many calls upon RP resources currently, in particular new guidance on building and fire safety. This will potentially have a significant impact on resources to invest in intensification and new development and could significantly change the business cases for retention or redevelopment of some estates. Similarly, achieving the zero-carbon target by 2050 will also be a financial challenge for RPs as existing homes will need to be retrofitted and new build housing will need to meet higher standards.
12. Ensuring our residents homes are safe is a top priority and we will ensure all building works meet the new legislation the government is proposing to introduce in the draft Building Safety Bill. This sets out proposals for stricter regulation of fire and structural safety as well as changes to the building regulations that will apply to all building work, both new development and refurbishment. The proposals cover the performance of all buildings and those who work to design, build and maintain them. This will increase development costs and will have an impact on the number of new homes RPs are able to deliver. The draft Bill also proposes enhanced sanctions and redress for those who do not comply with the new regulations when they become law. A new Building Safety Regulator will implement and enforce the new more stringent regulations. A New Homes Ombudsman scheme will also be established, and all developers will be required to become a member.
13. We will continue to work with Peabody and Royal Borough of Greenwich to deliver the transformation of Thamesmead. Peabody have commenced the construction of approximately 1,478 homes to be delivered as part of the Housing Zone, of which at least 591-623 will be affordable. A further 1,800 homes will be delivered towards the later phases of the Wolvercote/Lesnes regeneration, following a positive outcome from a resident ballot. Peabody are building a new neighbourhood and are providing a new public library/civic centre, shops, cafes and leisure facilities, including the refurbished Lakeside Centre as well new boating facilities. They have also funded the advance expansion of Parkview School to meet the expected increase demand arising from the Housing Zone numbers.

14. We worked closely with the Orbit Housing Association to deliver their estate regeneration plans for the Lerner Road and Arthur Street estates. Both estates had become increasingly unpopular places to live with significant remedial structural work required and predominantly mono housing tenure consisting mainly of bedsits and 1-bedroom flats; offering little choice in terms of size and tenure. Orbit has now transformed Lerner Road into the award-winning Erith Park and the regeneration of Arthur Street is expected to deliver another great place to live. Estate regeneration has provided the opportunity for better quality housing with a mix of tenure and unit size and improved public realm. While the overall number of affordable properties has reduced, there are now much needed larger family sized properties available to our residents to rent in a more attractive place to live.
15. We are working in partnership with RPs to identify proposals for the borough's first, much needed, affordable extra care scheme. The Council has agreed to make a capital investment towards delivering this new scheme.
16. Working together with our RP partners we will deliver our aspirations in a sustainable, planned manner. We will be mindful when supporting decants for large scale regeneration of the pressure these place on our pool of potential allocations at a time when we have large numbers in temporary accommodation. Through formal consultation on the draft strategy we sought the views of our partners on the proposed areas for action below:
  - a. In recognition of their pivotal role we want to re-invigorate our partnership arrangements with our key RPs, through the establishment of a new Strategic Housing Partnership Board. This will focus on the management and maintenance of their existing stock, the development of new affordable homes and involve them more fully in programmes to deliver our corporate strategies and priorities.
  - b. To work more closely with our RP partners as they explore the potential for the further development and intensification of their existing social housing land and develop the business cases to support this.
  - c. To work with our RP partners on new development opportunities and the acquisition of existing market stock to ensure they maximise opportunities to increase the number of affordable properties to rent and buy.
  - d. Informed by our data on the housing need, we will work with our RP partners as they develop the business cases and timescales for the redevelopment and intensification of their existing sheltered housing/specialist housing. This will enable the provision of much needed specialist housing including extra-care and homes for care leavers. We will develop these opportunities with feedback from our service users, including Positive Journeys, our leaving care team and our Corporate Parenting Board.
  - e. To ensure that we are receiving the maximum housing nominations from our RP partners and that we can allocate their properties to those in greatest housing need.

- f. To intensify our work with RPs to secure the most efficient use and management of their existing social housing stock, including the short-term use of empty properties including estate regeneration voids. and to reduce void periods.
- g. To maximise opportunities and incentives for social housing tenants to move, downsize and address overcrowding. RPs will work with new and existing tenants to provide advice and support to help them maintain their tenancies, improve their employability and life opportunities.
- h. To hear from smaller, new to Bexley RPs, to understand what they can offer to deliver more housing in the borough and how we might help.
- i. To work with a range of organisations - RPs, private developers and landlords - to consider the options and viability of pursuing new delivery models for providing additional temporary accommodation and private sector supply at affordable levels to meet housing need.
- j. We will continue to grow our “Rent it Right” scheme which involves working with private landlords to increase the supply of private sector offers available for us to nominate tenants.
- k. We will work with RPs and other providers to explore alternative housing options for our care leavers which should include semi-independent accommodation and floating support services. This work will also form a part of the work with the VCS to support our most vulnerable and any market shaping activity.

## **Theme 2 – Council’s Policies**

### **Growth Strategy, Local Plan and Planning Policies**

1. Our Growth Strategy, adopted in 2017, set out a series of proposals to provide for a programme of housing and employment growth predicated on a robust evidence base and the key catalysts of redesignation of Strategic Employment Land and transport infrastructure funding. Our Local Plan and Planning Policies provide further policy context in line with legislation and guidance from national and regional bodies. This is further reflected in Bexley’s strategic framework and Corporate Plan.
2. These policies will support the delivery of affordable homes over the five-year period of the Housing Strategy. Moreover, they will acknowledge the viability challenges particular to places like Bexley with low development values and often high construction and infrastructure costs. They will establish suitable mechanisms such as affordable housing cascades and off-site contributions to ensure the impacts of these constraints are minimised.
3. The ‘golden thread’ running through both plan making and decision taking is a presumption in favour of sustainable development. We will continue to work positively through the planning process to attract and encourage well designed developments that enhance the built environment to come forward and to be built.
4. We will use our statutory powers to assemble sites and build partnerships to allow development to be brought forward.
5. We will continue to provide timely guidance about the preferred mix and tenure of homes on individual developments. We will, where appropriate, support private sector developments through assistance via site assembly and asset management.
6. All our targets will stay strongly grounded in the evidence base.

### **Private Sector Housing Policies**

1. We will continue our work with private sector landlords to increase the supply of homes to let, to improve property standards and to tackle rogue landlords using new selective licensing powers given by the Government to ensure that private renters are given a fair deal.
2. We will review opportunities for Build for Rent developments of professionally managed homes for market rent funded by institutional investors and developers.
3. In terms of the local regulation of the private rented sector, the Council has already introduced a Selective Licensing Scheme covering all privately rented residential accommodation falling outside the definition of mandatory Houses in Multiple Occupation (HMOs) in four defined areas in the North of the Borough:

- Thamesmead North
  - Abbey Wood/Lower Belvedere
  - Erith
  - Manor Road
4. Our aim is that the policy improves housing standards in the private sector rental market which has an important role to play. The scheme came into force on 1st October 2018 the same date as the changes to mandatory HMO licensing came into force that require HMO properties with five or more occupiers to be licensed irrespective of the number of storeys.
  5. The Bexley scheme is based on areas where there is evidence of high levels of private renting coupled with high levels of ASB (compared to national and borough averages). It is a proactive approach that resolves the issue of relying entirely on complaints to flag issues, will improve conditions for the most vulnerable tenants and provide further regulatory control of the private rented sector. It is important that we ensure landlord compliance with the licensing scheme and that we take the necessary enforcement action to ensure properties that require a licence are licensed.
  6. Selective licensing schemes are time-limited to five years and Bexley's current scheme will end on 31st August 2023. The housing team will start to gather evidence to see whether there is a case for a further selective licensing scheme to be designated when the current one ends in August 2023.
  7. At the same time as the launch of the licensing scheme, we also introduced an incentive scheme for landlords to offer us properties which we could then nominate tenants to. In return for an incentive payment the landlord will offer a homeless client a tenancy for two years at Local Housing Alliance (LHA) rent levels.
  8. We have recently awarded a contract to a homeless charity to deliver a move-on support service which will provide targeted support for those at risk of homelessness due to family or friends no longer willing to accommodate them. This may be due to relationship strain or breakdown, overcrowding, pregnancy or other reasons. We have called the initiative "Stepping Stones" We will refer suitable participants to the move-on support service upon initial assessment. The Provider will be expected to assess and triage referrals and work closely with service users to understand their circumstances and support needs. On a case-by-case basis, the Provider will offer tailored housing and move-on support to prevent homelessness and secure suitable accommodation for participants.
  9. Homes that are empty for long periods of time can blight a local environment, reduces homes available to residents and impacts on the collection of Council Tax. There can be many reasons why a home is empty, and we will use a range of solutions to bring the property back into use. We will continue to work to proactively identify empty properties and use a range of enforcement and support to bring them back to use. This includes funding repairs in return for nominations to the property through our PSL schemes.

## **Housing Allocations Policy**

1. The draft policy was reviewed in 2019 to reflect the changes resulting from the Homeless Reduction Act 2017, However, the COVID pandemic has created new obligations and pressures on the boroughs finite housing stock. The situation is also likely to be impacted by the emerging Domestic Abuse Bill 2020 which will place a statutory duty on local authorities to provide support to victims of domestic abuse and their children within refuges and other safe accommodation and provide that all eligible homeless victims of domestic abuse automatically have 'priority need' for homelessness assistance.
2. Given this, the Council must further reflect if any additional shift in approach is required as it seeks to manage unrealistic expectations.
3. Given the fact that the Council had previously consulted with residents and RP partners, further consultation will be swift and succinct. The main focus of the revised policy is likely to only allow those to come on to the register who have a priority need or are existing social housing tenants, priority for existing social housing tenants through local lettings policy on new build, local connection and how properties are prioritised for those in greatest need. Increased priority for the armed forces will reflect statutory guidance issued in June 2020 alongside a new private sector offer protocol. This will ensure that we are best able to meet our housing duty and make the most effective use of very limited housing nominations of affordable homes for rent.

## Theme 3 – Council’s Data and Performance

Our Housing Strategy Delivery Plan will measure and monitor progress against actions and performance indicators against agreed targets. We will estimate future trends based on demographic and other key data and monitor cost variables. We will also track the economic and social change engendered by the pandemic and review modelling assumptions on affordability and need.

1. Our Performance Framework will incorporate the Housing Strategy performance indicators, and these will be monitored closely to ensure that we achieve a strong performance management and delivery culture.
2. We will monitor the population change taking place in Bexley so that we can plan for the services our residents need. Bexley’s population is ageing but also becoming more diverse and much of the population growth is expected to be in the north of the Borough. Our data will inform our priorities, target setting and delivery.
3. We will use all available housing needs and supply data to understand and project the future needs of our vulnerable residents, working with Adults, Children’s and Health to identify and support the provision of quality housing options that meets the needs of our care leavers, older people, victims of domestic abuse and their children, disabled and homeless residents through their lifetime and support them to live as independently as possible. This will inform the guidance we provide on our preferred mix and tenure of homes on individual developments and will also identify priorities for further action to be reflected in the annually refreshed Delivery Plan.
4. We will align our Housing Strategy performance metrics in line with need identified through the Children’s Services Sufficiency Strategy outlining requirements for our Care Leavers housing needs.
5. We will capture, monitor and analyse the new supply of housing from pre-applications to build completion and understand and plan for the impact of additional supply, future estate regeneration and impact on housing nominations available for us to allocate to our residents in priority need on the housing register and to inform the impact on the Council’s Medium-Term Financial Strategy.
6. We will maintain a rigorous focus on preventing homelessness by providing early, accessible information, guidance and advice. We will continue our successful partnership working with the Citizens Advice Bureau; last year we entered into a new 5-year grant agreement for their excellent general advice service which has helped with the increase in demand for immigration, housing, benefits, debt and Universal Credit advice. Operationally we will review our housing service’s strategic framework to ensure it is fit for purpose and step up our investment in staff induction, training and development.
7. We will extend the housing options available to our residents and mitigate the use and limit the cost of temporary accommodation. This builds on the work already completed which has seen a shift away from the more expensive nightly acquired accommodation to more cost-effective options such as property purchase and private sector leasing (PSL).

8. The majority of households in TA are in receipt of Housing Benefit (77% as at June 2020) at varying rates depending on their individual circumstances. We will review our processes for managing those in temporary accommodation, including processes to ensure TA clients are assessed for housing benefit eligibility, as soon as practical, with advice and assistance being given to complete claims.
9. We will monitor the numbers of properties licensed through Bexley's selective licensing scheme and assess the impact of licensing on the private rented sector.
10. We will monitor and reduce the numbers of long-term empty homes and take the appropriate action to bring back properties into both short term and long-term use.
11. We will provide support and funding to allow residents to live in their own home for longer –  
[Bexley Care Hub](#)  
[Disabled Facilities Grant](#)
12. In 2020/21 we will implement the strategy for the future of Homeleigh, which will retain its use as council owned accommodation to house homeless households.
13. The Housing Strategy is considered to align with the local plan and Growth Strategy and development sites should seek to comply with both documents.
14. It is important as the only shareholder of BexleyCo we work closely with the Company to ensure that it achieves its business plan financial and housing aspirations over the next five years. The Council's Delivery Plan will report annually on BexleyCo progress and also identify any additional opportunities to increase the delivery of housing within the borough.



## Theme 4 – Resident Offer

Before the pandemic struck, the housing market had been steadily gathering momentum. Activity levels and price growth were edging up due to continued robust labour market conditions, low borrowing costs and a more stable political backdrop following the general election and BREXIT. Post-COVID we may see a sharp economic contraction as a result of the necessary measures adopted to suppress the spread of the virus, but the raft of policies adopted to support the economy should set the stage for a rebound once the shock passes and help limit long-term damage. These same measures should also help ensure the impact on the housing market will ultimately be less than would normally be associated with an economic shock of this magnitude. But the shape of the recovery is still not clear, so we will remain flexible and alert both to changing demand and funding opportunities.

1. Our ambition is to offer a range of housing options that meet the different needs of our residents across all age ranges, households and needs be they home owners, private or social tenants or those who need higher levels of our support and care. This also incorporates preventative measures designed to help minimise homelessness, so that residents are able to maintain a roof over their head.
2. We will review how we prioritise affordable rented homes and look at the planning tools available to us such as altering the affordable housing cascade so that instead of increasing intermediate housing when there is a viability issue, insist on keeping the social rented units even if that means a reduction in overall affordable numbers on the site.
3. Prioritise s.106 payments in lieu for affordable rent.
4. Consider the introduction of a tariff payment from small sites (proposed in our emerging Local Plan) for investment into social rent.
5. We know that some residents could afford to buy their own home if there were more affordable products. Many of these households are in work and some may be residing in the Private Rented Sector or with family and friends and would have previously sought and found their own housing solution but are increasingly looking for support from the Council because of the increasing cost of both private renting and buying in the borough. It is therefore important that we sustain an offer for these residents alongside affordable rented.
6. Affordable routes into home ownership should be an integral part of any housing offer, particularly where this helps to create mixed thriving communities. These can and should be actively marketed to Bexley residents to ensure they meet a local need. We will work with our housing association partners in providing a flexible housing journey for those residents who are seeking an intermediate/ home ownership offer, this could include shared ownership, rent to buy, market rent and market sale.
7. Our affordable housing policy, (confirmed by our primary housing evidence base, the Strategic Housing Market Assessment (SHMA)) seeks a tenure split of 70% social rent to 30% intermediate/shared ownership on qualifying sites. Any deviation from the policy requirements due to the nature of development, site, locational or financial considerations needs to be fully justified. We negotiate s.106

Agreements on qualifying sites of 10 or more homes to secure the provision of any affordable housing and to mitigate the impact of development on the local community and infrastructure. We also aim to maximise the use of local labour and employment opportunities on major development schemes.

8. It is important that when such homes are built, local residents are prioritised, and we will work with all providers to ensure this happens.
9. We will also review lettings arrangements so good tenants looking to move within the social rented sector have an appropriate level of priority when new build homes become available.
10. We know private rents are often unaffordable to our residents on local and medium incomes, and tenants can face large, unpredictable rent increases. While we currently have limited powers in relation to affordability of private rent level and security of tenure, we will continue to help raise standards with our Rent it Right initiative. We will continue to make the case for tenants to be given the choice of stable tenancies for years, not months; for rent rises to be capped and for a range of other measures that will improve the private rented sector for tenants and landlords
11. We have a close working relationship with the Department for Work and Pensions and Bexleyheath Job Centre to ensure the transition to Universal Credit works well, and residents know where they can seek help and support. We have also developed innovative schemes with a credit union to allow arrears to be paid off to stop possession proceedings as well as the offer of rent in advance and deposits to move to alternative private rented properties. We will always try, if we are made aware of a problem, to intervene as early as possible (preferably before a notice is served) in any landlord/tenant dispute and try and resolve the issue
12. It is assumed that there will always be a need for adaptation of existing dwellings to support those with additional needs. We offer Disabled Facilities Grant (DFG) to residents who are having difficulty getting around their home or in using the facilities. It is available for a range of work that will help a disabled person remain in their home. Grants are available to tenants, owner occupiers or a landlord on behalf of a disabled tenant. The grant is means tested to ensure that those in the most need get the most help. We will review the grant to ensure that it remains fit for purpose and identify any opportunities to make it a more joined up and effective tool.

## Appendix 1: Delivery Plan

The finalised Housing Strategy Delivery Plan will be monitored through Bexley's Performance Framework and reported to Public Cabinet annually. We propose that we:

1. Establish a Strategic Partnership with key partner RPs developers/partners to consult, agree the Housing Strategy and delivery plan targets and timescales.
  2. Monitor housing delivery against Bexley's draft London Plan housing target.
  3. Review the merits and demerits of reopening a Housing Revenue Account (HRA).
  4. Work closely with our RPs to make better use of existing stock by:
    - Agreeing a protocol/target to increase the supply of Temporary accommodation available to the Council by using properties temporarily held empty for regeneration schemes.
    - Encouraging mutual exchanges.
    - Work with RPs and their tenants to review incentives (in line with the Revised Allocation Policy) that may encourage tenants to move from homes that are larger than they need. This would help to free up family accommodation.
    - Undertaking a regular programme of tenancy audits.
    - Identifying and supporting RP tenants where appropriate to purchase a property outright/shared ownership.
    - Having a better understanding of the management of voids (the period properties are empty between lettings).
    - Partnership working with RPs to ensure the housing register and choice-based lettings scheme provides quick outcomes for those who are in most housing need.
    - Maximising nominations from new and existing stock with current tenants having enhanced access to new build schemes.
  5. Work with RPs to develop a programme of estate capacity studies to identify potential opportunities for additional housing, including affordable supply and to intensify and improve the use of existing land.
  6. Work with RPs to develop a programme to remodel, intensify and modernise existing supported and sheltered housing schemes.
  7. Work with RPs to review the housing pathway for identified needs and associated housing support for care leavers, to promote suitable timely offers of accommodation and tenancy sustainment.
  8. Use our master-planning of our strategic growth areas to shape and promote the appetite for developments and attract partners to build in the borough.
  9. Monitor annually the build out of approved planning applications and use the new Strategic Partnership Board to monitor and influence development progress.
  10. Conclude consultation with RPs and monitor proposed changes to the Housing Allocation Policy which governs the priority to be given to different groups for social housing. This review includes the priority afforded to vulnerable people including those with a disability or mental illness who are likely to be unable to work in the long term. It is proposed that the revised Bexley's Housing Allocation scheme will
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give higher priority for affordable rented homes to people who have a local connection with the borough of at least five years.

11. Work with developers to ensure that all new properties are marketed first to Bexley residents and workers and develop local letting plans.
12. Implement the decision to secure the future of Homeleigh, which will retain its use as council owned accommodation to house homeless households.
13. Work with partners to seek opportunities to develop sites for supported living for vulnerable residents, (especially those with learning disability or mental health needs) where they can share some communal space whilst enjoying their independence in their own apartment or flat, supported by their choice of care provider.
14. Identify a Council owned site for disposal to an RP for delivery of a specialist housing scheme.
15. Work with key partners to develop the Local Plan evidence base and a lobbying strategy to support the release of employment land in Bexley for housing in line with delivering both our refreshed Housing Strategy and adopted Growth Strategy.
16. Work with key partners to develop the evidence base and a lobbying strategy to attract the investment and build the business case to support the delivery of the strategic transport infrastructure required to deliver the Growth Strategy.
17. Mitigate the use and cost of temporary accommodation.
18. Prevent homelessness through focusing on the main reasons for homelessness and making appropriate interventions. The second largest reason for homelessness is family or friend relationship breakdown. The new "Stepping Stones" project will focus on this client group and provide a mediation focused approach.
19. Continue to support the adaptation of housing stock in Bexley to meet the needs of our residents DFG, investment, numbers, target to be set.
20. Ensure all building works meet the new legislation the government is proposing to introduce in the draft Building Safety Bill. This sets out proposals for stricter regulation of fire and structural safety as well as changes to the building regulations that will apply to all building work, both new development and refurbishment.
21. Track, monitor and, through its shareholder powers, ensure that BexleyCo delivers its agreed housing numbers in line with their annually reviewed business plan targets and meeting all planning policy requirements including for high quality design and placemaking. The agreed strategy is to deliver 1200 new homes with the ambition to increase to 2500.
22. Help young people with complex needs reaching adulthood to live as independently as possible within the community. This needs both the right housing and support services available to help progress towards independent living through integrated care and support plans and clear move-on pathways.
23. Review the current effectiveness of the support we give our care leavers, the review to consider: pathways to appropriate accommodation in line with our sufficiency duties, maintaining tenancies, support into work, training or further education. The effectiveness of current approach will be tested and will identify areas for improvement which will be reflected in the delivery plan. Our Corporate

Parenting Board (CPB) could take a lead role in overseeing the review and monitoring the resulting agreed actions within the delivery plan. This has been agreed as an area of particular interest to the CPB in 2019 and continues.

24. Seek to increase the number of accredited landlords using the licensing scheme requiring all Houses in Multiple Occupation (HMO) to be licensed, the Council has introduced a requirement for new small HMOs to obtain planning permission.

## Appendix 2: Affordable Housing Products Definitions

<b>Affordable housing for rent</b>	<p>Affordable housing for rent meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p>
<b>First Homes</b>	<p>The Government has consulted on proposals to provide first time buyers with discounts of at least 30% on new homes. The discount will enable people to buy a home in their local area, the prioritisation will be defined at the discretion of the Local Authority and can be either residency or work location as appropriate. The discount will be locked into homes and apply to future sales. First Homes will be funded through contributions that housing developers provide through the planning system to ensure new development delivers benefits for local communities. However, the provision of First Homes is likely to have an impact on the supply of other affordable housing tenures normally funded through developer contributions.</p>
<b>London Affordable Rent</b>	<p>Affordable rented homes for low income households let by RPs at benchmark rents are set annually by the GLA. The total rent and service charge will be at least 20% lower than local market rents.</p>
<b>London Living Rent (intermediate)</b>	<p>London Living Rent is an affordable housing product introduced by the Mayor of London for middle-income households who now rent but want to build up savings to buy a home. Rent levels are set by the GLA at one third of average local household earnings and tenancies are for a minimum of three years. Existing private or social renters with incomes of up to £60,000 p.a. agreeable to apply Tenants are expected to purchase their homes on a shared ownership basis within 10 years.</p>

<p><b>Shared Ownership (intermediate)</b></p>	<p>Shared Ownership is a type of intermediate housing available from RPs for part buy/part rent. Shared ownership buyers need household incomes that let them afford to pay between 25% and 75% of the full market value of the property. They are also expected to have a 10% mortgage deposit for the share to be purchased. Mortgage amount and repayments are then lower than buying a property on the open market.</p> <p>The rent on the unsold share is currently capped at 2.75% of its value when the first share is sold. Purchasers may buy more shares in the property when they can afford to until the property is owned outright. This is known as 'staircasing'. Additional shares are based on the market value of the property at the time of staircasing. If the property is in an estate with common areas, a service charge for maintenance and upkeep of these areas and the grounds of the building is required.</p> <p>The GLA requires that household annual income in less than £90,000.</p>
<p><b>Social rent</b></p>	<p>Social rent is dependent on the location and size of a property, and is set according to earnings in the area, but they are typically between 50-60% of market rents. Social rented housing is owned by local authorities and RPs for which guideline target rents are determined through the national rent regime.</p>

## Appendix 3: Council's Data & Performance

Note: Listed below is a draft set of KPIs relating to the Housing Strategy. These are being developed alongside a set of operational Housing Service KPIs

Topic	KPI	Data source	Reporting level and frequency	Existing/New KPI
House price trend	% change in house prices	HM Land Registry	Operational - yearly	New
Private rental market price trend	% increase in rental cost		Operational - yearly	New
Current housing stock and tenure	All owner-occupied	Strategic Housing Market Assessment (2020)	Operational	New
	Owned outright			New
	Owned with mortgage			New
	Shared owner			New
	All social rented			New
	Private rented			New
	Private landlord or agent			New
	Other rented/rent-free			New
	LA including owned by other LAs	Ministry of Housing, Communities & Local Government	Operational - yearly	New
	Private Registered Provider			New
	Private Sector			New
	Total			New
	Development pipeline	No. units planned for completion (based on permissions & under constructions) in next 1-5 years	LB Bexley Five-year land supply annual assessment	Operational - yearly
No. units planned for completion (based on permissions & under constructions) in next 15 years		LB Bexley Authority Monitoring Report	Operational - yearly	New
Build out	Number and % of units with planning approvals where building work has commenced	London Development Database	Operational - annual	New
	Number and % of units with planning approvals			New




Topic	KPI	Data source	Reporting level and frequency	Existing/New KPI
	that have not been developed			
	Number of housing units approved but not yet commenced (after a given time period)			New
	Number of housing units commenced but not yet completed (after a given time period)			New
Completions (by ward)	No. and % new homes delivered (Housing Delivery Test - % housing target completed over 3 yrs - target 95%+)	Ministry of Housing, Communities & Local Government	Corporate - annual	New
	No. and % affordable housing delivered	Ministry of Housing, Communities & Local Government  Additional Affordable Housing Supply - affordable housing supply statistics	Operational - yearly	New
	% expected completions delivered - permissions in a given year, since completed	Service	Operational - yearly	New
Change to stock	Net change in supply of affordable rented housing	Housing Strategy & Enabling Team from info from RPs	Corporate - yearly	New
Empty Properties	All vacant	Council tax base (CTB) - statistical release	Operational - yearly	New
	Long term vacant	Council tax base (CTB) - statistical release		New
	Private Registered Provider general needs vacant	Homes and Communities Agency's Statistical Data (SDR)		New
	Private Registered Provider general needs long term vacant	Homes and Communities Agency's Statistical Data (SDR)		New
Accessible homes	% of homes built to Building Regulation  M4(2) Accessible and adaptable dwellings standard and % of homes	Building Control	Operational	New

Topic	KPI	Data source	Reporting level and frequency	Existing/New KPI
	built to M4(3) Wheelchair user dwellings			
Houses in Multiple Occupation (HMO)	No. and % of HMOs	Service	Operational	New
Disabled Facilities Grant (DFG)	Number of referrals	Service	Operational - monthly/quarterly	New
	Spend			New
Decant pipeline	No. units planned for decant in next year / 1-5 years / 5-10 years	Housing Strategy & Enabling Team from info from RPs	Operational - yearly	New
Housing stock condition	No. and % homes meeting Decent Homes Standard	Statistical Data Return to Regulator of Social Housing	Annual	New
Planning performance	% minor planning applications approved within statutory period of 8 weeks	Service Development Manager, Planning	Corporate - quarterly	New
	% major planning applications approved within the statutory period of 13 weeks			New
	% of planning applications subject to an Environmental Impact Assessment approved within the statutory period of 16 weeks			New
PRS Licensing	No. and % of properties licensed under selective licensing scheme	Housing Services	Corporate - monthly (Cumulative)	Existing
HMO Licensing	No. and % properties licensed	Housing Services	Operational - monthly (cumulative)	Existing
Planning 'quality'	% minor planning decisions overturned at appeal	Service Development Manager, Planning	Corporate - quarterly	New
	% major planning decisions overturned at appeal			New
Council tax growth assumption	£ and % change built into MTFS	Finance	Operational - yearly	New
	Spend	Finance		New

Topic	KPI	Data source	Reporting level and frequency	Existing/New KPI
Temporary Accommodation spend	Variation to budget		Operational - monthly/quarterly	New
Population projection	No. and % increase (calculation of projected household formation rates and affordability factor)	ONS	Corporate	New
			2 yrs	New
Vulnerable Adults projections	No. and % increase		Operational - yearly	New
Age 65+				New
Age 75+				New
Age 85+				New
Physical disability				New
Learning disability				New
Mental health				New
Care leavers				New
Temporary Accommodation applications	No. and % increase	Housing Service	Operational - monthly	New
Temporary Accommodation acceptances	No. and % increase	Housing Service	Operational - monthly	New
	% residents in TA		Operational - monthly	New
Number in Emergency Accommodation	No. and % increase	Housing Service	Operational - monthly	New
	% residents in EA			New
Homelessness acceptances	No. and % increase	Housing Service	Corporate - monthly	Existing
	% of people accepted as homeless			New
Housing waiting list	No. and % increase	Housing Service	Operational - monthly	New
	Severity of need score			New
Homelessness prevention	No. and % of preventions of homelessness	Housing Service	Corporate - monthly	Existing
Nominations	No. of residents on Housing Register nominated for an RSL new build or re-let	Housing Service	Operational - monthly	New

Topic	KPI	Data source	Reporting level and frequency	Existing/New KPI
	(as a % of residents on housing register or % of residents removed from housing register)			New
Risk	% residents paying rent that exceeds their Housing Benefit	Housing Service	Corporate - quarterly	New
	% residents who cannot afford to buy a home in Bexley		Operational - yearly	New
Right to buy applications	No. of RtB applications	Housing Service	Operational - monthly	New
Suitable accommodation	No. and % care leavers in suitable accommodation	Housing Service	Corporate - monthly	Existing
	No. and % of residents in unsuitable accommodation			New
	% overcrowded homes			New
EA and TA performance measures	Number of households in TA	Housing Service	Corporate - monthly	Existing
	Number of children in TA		Operational - monthly	New
	Average stay in TA		Operational - monthly	New
	Number of households in EA		Operational - monthly	New
	Number of children in EA		Operational - monthly	New
	Children / Pregnant women in EA more than 6 weeks		Corporate - monthly	New
Benefit to local residents	% new supply of shared ownership homes marketed in borough first	Housing Strategy & Enabling Team from info from RPs	Operational - yearly	New

## Appendix 4: Housing, Planning, social and physical infrastructure challenges and the relevant Council Strategies to address them

 Lead Strategy

Issues/ Challenges	Corporate Plan 2019	Housing Strategy 2020	Growth Strategy 2017	Local Plan 2012	Preparing for Adulthood Strategy 2019- 2023	Draft Ageing Well Strategy 2018	Learning Disability Strategy 2017-2021	Bexley Adult Autism Strategy 2017 - 2019	Bexley Town Centre Strategy 2017	Homeless Strategy 2013-2018	Draft Housing Allocations Policy 2019	Prevention Strategy 2019	Health and Well- being 2013	School Place Commissioning Plan 2019-2022
Housing need	√	√	√	√	√	√	√	√		√	√	√	√	
Housing requirement (target)		√	√	√										
Housing supply/ trajectory		√	√	√										
Housing viability		√		√										
Funding for housing		√			√	√	√	√						

London Borough of Bexley - Housing Strategy 2020-2025

Issues/ Challenges	Corporate Plan 2019	Housing Strategy 2020	Growth Strategy 2017	Local Plan 2012	Preparing for Adulthood Strategy 2019- 2023	Draft Ageing Well Strategy 2018	Learning Disability Strategy 2017-2021	Bexley Adult Autism Strategy 2017 - 2019	Bexley Town Centre Strategy 2017	Homeless Strategy 2013-2018	Draft Housing Allocations Policy 2019	Prevention Strategy 2019	Health and Well- being 2013	School Place Commissioning Plan 2019-2022
Housing locations	√	√	√	√					√			√		
Housing type/size		√	√	√	√	√			√					
Housing tenure		√	√	√										
Housing design	√	√	√	√	√	√	√	√				√		
Housing sustainability	√	√	√	√										
Housing loss/vacancy		√	√	√					√					
Specialist housing	√	√	√	√	√	√	√	√	√	√	√	√	√	
Homelessness	√	√			√					√	√	√	√	
Allocation of housing		√			√						√			

Issues/ Challenges	Corporate Plan 2019	Housing Strategy 2020	Growth Strategy 2017	Local Plan 2012	Preparing for Adulthood Strategy 2019- 2023	Draft Ageing Well Strategy 2018	Learning Disability Strategy 2017-2021	Bexley Adult Autism Strategy 2017 - 2019	Bexley Town Centre Strategy 2017	Homeless Strategy 2013-2018	Draft Housing Allocations Policy 2019	Prevention Strategy 2019	Health and Well- being 2013	School Place Commissioning Plan 2019-2022
Estate renewal/ regeneration	√	√	√	√					√			√		
Supporting infrastructure: Transport	√	√	√	√								√		
Healthcare													√	
Education														√
Residential parking			√	√										
Partnership working with developers	√	√	√	√					√					
The Council as developer	√	√	√	√					√					

Issues/ Challenges	Corporate Plan 2019	Housing Strategy 2020	Growth Strategy 2017	Local Plan 2012	Preparing for Adulthood Strategy 2019- 2023	Draft Ageing Well Strategy 2018	Learning Disability Strategy 2017-2021	Bexley Adult Autism Strategy 2017 - 2019	Bexley Town Centre Strategy 2017	Homeless Strategy 2013-2018	Draft Housing Allocations Policy 2019	Prevention Strategy 2019	Health and Well- being 2013	School Place Commissioning Plan 2019-2022
Construction methods and standards			√	√										
Housing information and choice	√	√	√	√	√	√	√	√		√	√	√	√	
Housing statistics/ performance	√	√		√										



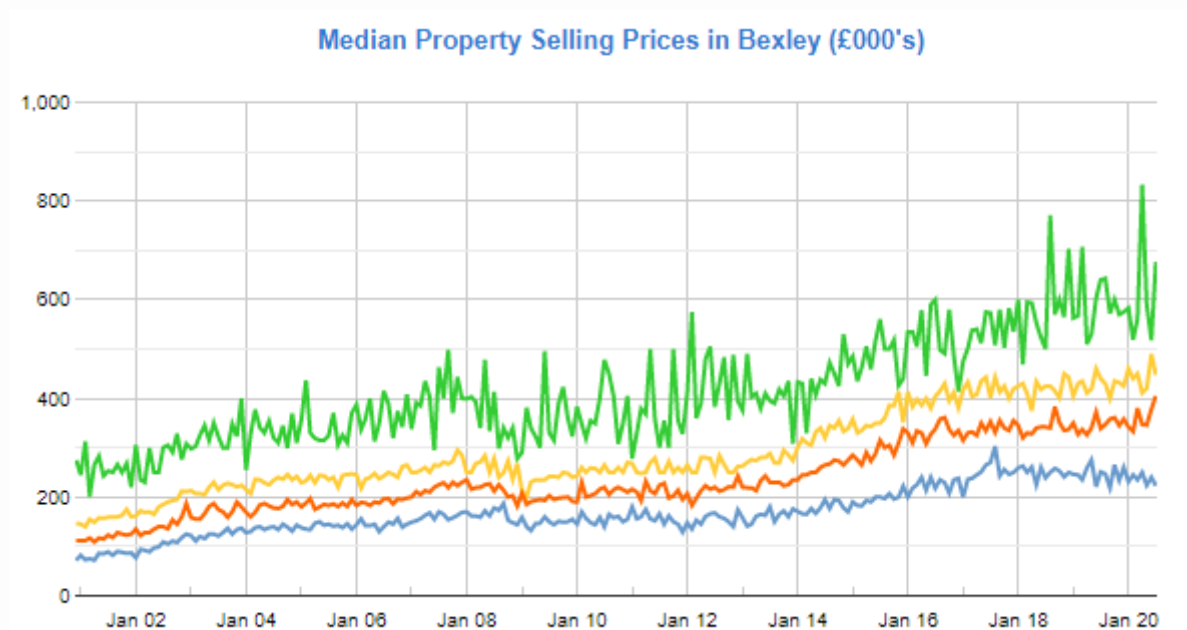
## Appendix 5: Strategic Housing Market Assessment

Every 5 years we produce a Strategic Housing Market Assessment (SHMA) that delves deeper into the specific housing needs in the borough.

Our most recent SHMA 2020 found that:

- House prices are low compared to London but higher than England average.
- 1.3% of dwellings in Bexley are estimated to be vacant.
- Approximately three quarters of properties are houses (including bungalows and a quarter are flats (including maisonettes).
- 64% have 3 or more bedrooms, 25% have 2 and 11% have one bedroom/ studio.
- Nearly three quarters are owner-occupied, 15% are affordable and 14% are private rented.
- 67% of households are economically active and 22% are retired.
- 25% of households receive less than £18,200 income per year, around half receive between £18,200 and £49,400 and 26% receive more than this.
- Bexley's aspiration is to achieve 50% affordable housing as a proportion of overall provision. On qualifying sites, the Council seeks a minimum of 35% affordable housing.
- It is recommended that the affordable tenure split is around 70% rented and 30% intermediate tenures.

The chart below shows Land Registry data which highlights the trend in median house prices in Bexley between December 2000 to July 2020.



## **BEXLEY POPULATION – WHO LIVES HERE?**

Please use the following link to access London Borough of Bexley 'Facts and Figures':

<https://www.bexley.gov.uk/services/council/bexley-facts-and-figures/who-lives-bexley/bexleys-population>

### **Overview**

- Almost 250,000 residents.
- Children and young people (under 25) account for almost a third of the population, whilst older people (aged 65 and over) account for a sixth.
- Projections up to 2050 show an aging population; over 65s will make up 22% of the population.
- Bexley will become more diverse. In the 2011 Census, the Black and minority ethnic population accounted for 18%, this was estimated at 23% in 2019 and projected to rise to 27% by 2030.

### **Total Population**

The ONS mid-2018 population estimate is 247,258. This has increased from 232,000 in 2011 (Census) and is predicted to increase to around 300,000 by 2050.

An ageing population - over 34,000 people in Bexley will be aged 75+ by 2050, compared to almost 20,000 in 2017, a 70% increase.

### **Births and Deaths**

- There are approximately 3,000 live births each year and around 2,000 deaths each year.
- These have remained reasonably stable over time with a steady increase in births.
- This has led to a natural increase in population.

### **Migration**

- The 2011 Census shows the top three countries of birth for those born outside of the United Kingdom as Nigeria, India and Ireland.
- Natural change (births - deaths) accounts for the largest rise in population (over 1,000 people each year).
- Net international migration accounts for over 700 people each year.
- Internal (domestic) migration has been volatile in recent years.

### **Conclusions**

The population of Bexley will change significantly over the next few decades. North of the borough will grow significantly, and Bexley will become more diverse. Bexley has an aging population – the population aged over 75 will almost double by 2050. The younger population will also increase, but to a much smaller extent.

## Appendix 6: Housing Key Achievements

### Housing Zone

- Approx. £35m in grant towards delivery of 1,478 homes (623 of which will be affordable) alongside commercial, retail, social and physical infrastructure.
- This included the completion of x1 first entry primary school expansion, a new library and Harrow Manorway improvements.
- CPO (Compulsory Purchase Order) approved by Secretary of State on 4<sup>th</sup> April 2018 following a successful Public Inquiry in November 2017 (31<sup>st</sup> Oct – 3 Nov 2017). This enabled the land assembly to take place to ensure comprehensive redevelopment of the area.

### Arthur Street (Park East)

- Demolition of 263 predominantly single tenure properties to make way for 320 new quality housing with no loss of affordable rented floor space.
- A mix of unit sizes and tenure offering more choice to residents.
- Improved public realm and connectivity to the local area.
- Successful decant of all residents to alternative suitable properties.

### Erith Park

- Demolition of a 622-home mono tenure estate with physical and social issues.
- Delivery of 586 mixed tenure homes, (30% are family sized) plus new community centre. £120 million contract value supported by grant funding of £28 million.
- Won RICS Regeneration Project of the Year in 2016.

### Securing 'enabling costs' from Partners

- The Housing Strategy and Enabling Team has secured an additional £320k from partners to assist in the Housing Strategy and enabling function resource for the Housing Zone, Arthur Street and Wolvercote Rd regeneration schemes, as a key part of partnership working.

### The Homebuilding Capacity Fund

- GLA fund to support council housing and planning departments with building the skills, capacity and expertise they need to adopt new approaches to increasing housing supply.
- LB Bexley received funding to produce; Area Design Codes - £190,000, Bexley Characterisation Study and a Design Guide supplementary planning document - £100,000.

### Preventions

- The introduction of the Homelessness Reduction Act has seen a significant increase in the numbers presenting as homeless. The number accepted last year is below the four-yearly average despite the number of approaches doubling.
- High levels of homeless preventions (Avg.26/month) have been achieved through working with a credit union. Over £600k in loans have been issued to help maintain existing accommodation and to be able to secure a new private rented tenancy.

## TA Numbers and Cost

- Property purchase programme - resulted in 200 properties being purchased for a value of £62m as an alternative supply of temporary accommodation for homeless households.
- PSL - milestone of 500 PSL properties reached in 2019.

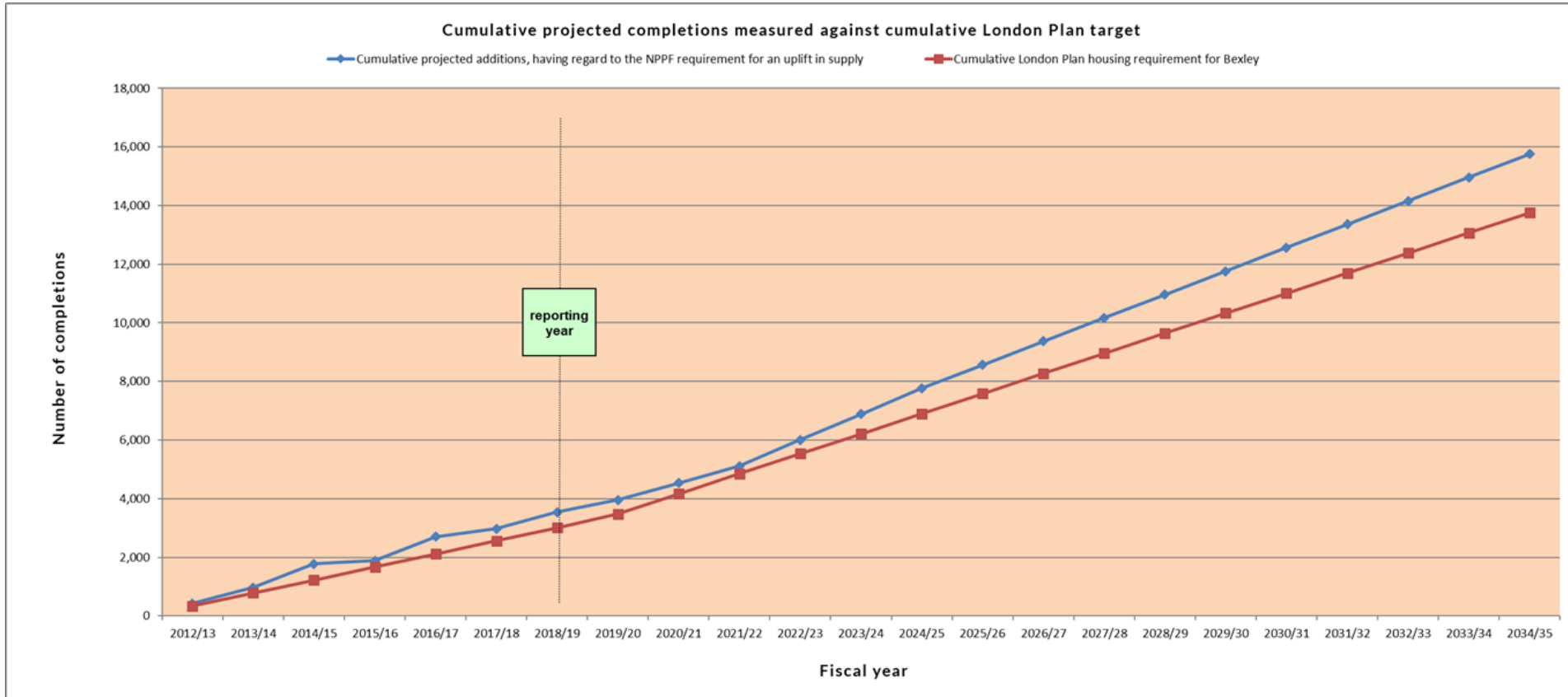
## Supply

- Established BexleyCo, a wholly council owned company. Their first site on Old Farm Park commenced with Moat Housing acquiring the affordable element – 21 London affordable rent and shared ownership homes.
- Rent it Right - incentive scheme offer to landlord an initial £4k plus a further £4k at the end of a two-year tenancy. In return they accept a nomination and let the property at LHA. Increase publicity and promotion campaign to improve take up.
- A programme to increase the supply of social rent properties agreed in 2018/19 and delivered by L&Q and Orbit through the funding of £5m from the off-site affordable pot.

## Housing Trajectory

- The figure below compares cumulative existing and proposed completions against the cumulative housing targets from the beginning of the Plan period.
- This figure illustrates that housing provision in Bexley has been – and is projected to continue to be – in line with the housing targets for Bexley set in the London Plan.
- In the 23-year period from 2012/13 (since adoption of relevant local plan policies) to 2034/35 (the end of the current 15-year housing trajectory), Bexley has provided, or is projected to provide, 15,889 net additional homes.
- This works out to an average of 691 units per year, which is above the current London Plan target of 446. This projected figure also suggests that the new London Plan housing target of 685 for Bexley may be achievable.

# London Borough of Bexley - Housing Strategy 2020-2025



## Appendix 7: Policy Drivers

### Policy Drivers: National, regional, local and how this strategy contributes to the key priorities of the borough

#### 1. National Policy Context

In recent years there has been a series of policy documents released as the Government seeks to adapt to rapidly increasing demand, a changing housing market and attitudes towards it.

The Government considers the planning system has a key role to play in dealing with housing issues and has introduced a range of changes to identify need and encourage supply including changes to what requires planning permission, a consistent way of working out need, penalties for local authorities for not building enough homes, more information about what land is available for development and easier ways of getting planning permission.

The need to boost the supply of new homes was again stressed in February 2017 when a Housing White paper 'Fixing our broken housing market' was published setting out the Government's plans to change the housing market and build more homes. In October 2017 it was made easier to fund Social Rent when £2bn of grant was made available for this sort of housing in areas of greatest need. This helped providers to develop new affordable homes at lower rent levels for the first time in a number of years. In London the Mayor has introduced a similar product known as London Affordable Rent.

The Government's support was confirmed again with the announcement in September 2018 of £2 billion new funding for post-2022 to enable housing associations to make long term development decisions. Similarly, the announcement of the lifting of the borrowing cap against existing housing stock for those Councils who still own their housing stock and the easing of restrictions on borrowing has encouraged councils to kick start their building programmes. Bexley is not in this position as we transferred our social housing to Orbit and London and Quadrant Housing associations in 1998. Nevertheless, other opportunities exist for us to intervene directly in the delivery of housing, for example our development Company, BexleyCo is well placed to deliver a programme of development in the years ahead.

A series of ongoing welfare reforms which started in 2013 and continue to be rolled out have also had an impact on the affordability of housing in recent years. These include the capping of Local Housing Allowance (LHA) rates until 2020, the benefit cap and lower level benefit cap, removal of the spare room subsidy and the ongoing roll out of Universal Credit.

As the cost of private renting increased the gap between maximum LHA rates and rents added to the issues of affordability of housing and increased demand for housing services. Nationally LHA rates were frozen between April 2016 and April 2020. From April 2020 LHA rates were planned to increase in line with the Consumer Price Index (CPI) inflation rate. However, as a response to the coronavirus pandemic LHA rates have now been uplifted further and will cover at least 30% of local market rents from April 2020.

Although the emergency uplift in LHA rates means more people paying lower quartile rents in Bexley will have their rents covered by LHA for the moment there will still be households in more expensive rental homes who will have a gap between their rent and LHA which will have to be made up from household income.

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## 2. Regional Policy Context

London's population is projected to exceed 10 million by 2036 and 11 million by 2050.<sup>1</sup>In parallel with population growth however, household sizes are expected to continue to fall.

Within this context The Mayor's draft new London Plan sets out policies to support increased housing supply in the capital whilst safeguarding the Green Belt and employment land. This includes setting housing targets for all planning authorities within London, including the amount that comes from smaller sites as well as the need to use previously developed land in areas well connected by public transport. It contains a range of measures to support these approaches including getting more development out of available land, the mixing of different uses and the building of affordable housing. The Secretary of State has directed the Mayor to make a number of changes to the Intend to Publish version of the new London Plan to make it consistent with Government policy. These include the removal of the principle of 'no net loss' of industrial floor space, giving boroughs increased flexibility in considering, in their Local Plans, surplus employment land for other uses including housing; modifications in the approach to Green Belt and Metropolitan Open Land (MOL) to reference release in exceptional circumstances; and, the removal of supporting text encouraging boroughs to seek affordable housing cash in lieu contributions from residential developments of 10 units or less. The increased flexibility for London boroughs to identify a supply of industrial land to meet demand is welcomed but still requires a robust case to be made to justify any change.

The London Housing Strategy also sets out the Mayor's proposals for working with boroughs and other partners to increase housing supply through:

- a) making more land available for building, including the release of public land and buying sites in private ownership;
- b) Investing more and in better ways to make development less risky and get the most out of new transport schemes;
- c) Getting more people building a variety of different homes, including small and medium-sized builders, and;
- d) Helping to train more construction workers and using modern technology to build more quickly.

However, these changes need to make sense for Bexley. Our local annual housing target has increased from 446 in the current London Plan to 685 new homes a year in the Mayor's Intend to Publish London Plan (annual average over a 10-year period). Many areas in our borough do not yet have committed, or

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<sup>1</sup> Source: GLA Population Projections – Custom age tables Borough projections – 2016 based population projections (published July 2017).

even planned, new and sustainable transport infrastructure to allow the high-density and mixed-use development. In this context, additional housing will always represent a challenge within Bexley.

### 3. Local Policy Context

High quality housing to meet local needs is a central feature of our Corporate Plan and growth aspirations. It has therefore never been more important to have a clear understanding of the nature of our housing issues and our ability to influence and respond to them so that we can develop and deliver the right housing objectives. To help us do this we collected a range of evidence including, in 2018, commissioning a local Strategic Housing Market Assessment (SHMA) to provide up to date information.

Our emerging Local Plan aims to deliver our Growth Strategy by making sure that the homes built meet the needs of our population and contribute to the growth of London whilst respecting the borough's overall character, heritage and identity. We have put together a range of proposals to help the development of more, affordable and high-quality homes in the right locations. We have also identified larger sites that could be brought forward for housing over the next 15 years. Small sites play an important role in providing the homes that we need, and we are proposing to ask for a funding contribution from these developments where more than 10 homes will be delivered to help provide affordable housing within the borough.



## Appendix 8: Legislative Framework

### Homelessness

#### National:

<a href="#">Housing Act 1996</a>	Defines homelessness and those threatened with homelessness.
<a href="#">Homelessness Act 2002</a>	Framework exists for local authorities to review homelessness in their area and to formulate a comprehensive strategy. It furthermore places a duty on local authorities to provide free advice and information about homelessness and preventing homelessness to everyone in their district and also to assist eligible individuals and families who are homeless or threatened with homelessness and in priority need.
<a href="#">Welfare Reform Act 2012</a>	Introduced changes to the benefit system including the benefit cap and Universal Credit.
<a href="#">Homelessness Reduction Act 2017</a>	Sets out new responsibilities for local authorities to tackle homelessness through focus on earlier intervention and prevention.
<a href="#">Domestic Abuse Bill</a>	Currently in the parliamentary process, next step is 2 <sup>nd</sup> reading of the Bill. The Bill will place a statutory duty on tier one local authorities to provide support to victims of domestic abuse and their children within refuges and other safe accommodation.
<a href="#">Care Act 2014</a>	Establishes a statutory duty on local authorities to protect people's wellbeing. The Act is aimed at preventative services and housing related support.

<p><a href="#">Health and Social Care Act 2012</a></p>	<p>Local authorities have a duty to take steps considered appropriate for improving the health in its area, including people experiencing homelessness or at risk of homelessness.</p>
<p><a href="#">Improving access to social housing for members of the Armed Forces</a> - under section 169 of the Housing Act 1996.</p>	<p>New statutory guidance published in June 2020 for local authorities to improve access to social housing for members of the Armed Forces Community. Published by the Secretary of State for Housing, Communities and Local Government under section 169 of the Housing Act 1996.</p>

**Regional:**

<p><a href="#">Mayors Rough Sleeping Commissioning Framework</a> <a href="#">January 2018</a></p>	<p>Contains priorities underpinning all rough sleeping service, projects and initiatives funded by the Mayor.</p>
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**Local:**

<p><a href="#">Homelessness Strategy 2013-18</a></p>	<p>The homelessness strategy is part of Bexley's joined-up early intervention and preventative approach.</p>
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## Planning Strategies

**National:**

<p><a href="#">National Planning Policy Framework (NPPF)</a></p>	<p>The revised NPPF, updated in February 2019, provides a framework in which Local Plans for housing and other development can be produced. It specifies that local planning authorities have a duty to plan for a mix of housing for different groups, including older people, based on robust data, needs analysis and local demographic projections. The NPPF sets out that the assessment of local housing needs should be</p>
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	<p>conducted using the standard method set out in national planning guidance. It implements reforms announced previously through the <a href="#">Housing White Paper</a>, the <a href="#">planning for the right homes in the right places consultation</a> It includes the Housing Delivery Test measurement rule book which will measure local authorities housing delivery annually.</p>
<p><a href="#">Planning practice guidance</a> (PPG)</p>	<p>Guidance on a range of topics including: Duty to Cooperate, Housing and Economic Development Needs Assessment, Housing and Economic Land Availability Assessment.</p>
<p>'Productivity Plan', <i>Fixing the foundations: Creating a more prosperous nation</i></p>	<p>This sets out a 15-point plan that the Government put into action to boost the UK's productivity growth. Of relevance to housing was the topic regarding 'planning freedoms and more houses to buy'. Set out a number of proposals in order to increase the rate of housebuilding and enable more people to own their own home, including a zonal system to give automatic planning permission on suitable brownfield sites; speeding up local plans and land release, stronger compulsory purchase powers and devolution of planning powers to the Mayors of London and Manchester, extending the Right to Buy to housing association tenants, delivering 200,000 Starter Homes and restricting tax relief to landlords.</p>

**Regional:**

<p><a href="#">The London Plan 2016</a></p>	<p>The overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London.</p>
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<p><a href="#">Affordable Housing and Viability SPG</a> <a href="#">August 2017</a></p>	<p>Aims to increase the amount of affordable housing delivered through the planning system; embed the requirement for affordable housing into land values; make the viability process more transparent and consistent.</p>
<p><a href="#">Mayor of London's Housing SPG</a> <a href="#">March 2016</a></p>	<p>Provides guidance on range of strategic policies including housing supply, residential density, housing standards, build to rent developments, student accommodation and viability appraisals.</p>
<p><a href="#">A City for all Londoners</a></p>	<p>Outlines the capital's top challenges and opportunities across priority policy areas.</p>
<p><a href="#">Mayor's Economic Development Strategy for London</a></p>	<p>Outlines plans to grow London's economy, support businesses, boost innovation and create a city that works for all.</p>

**Local:**

<p>Local Plan - <a href="#">Core Strategy (2012)</a></p>	<p>The Core Strategy sets out Bexley's planning policies for development in the borough. It aims to support a strong, sustainable and cohesive community.</p>
<p>Local Plan - <a href="#">Unitary Development Plan (UDP), as amended</a></p>	<p>The Unitary Development Plan (UDP) preceded the Core Strategy. It was adopted on 28 April 2004, but some policies expired in 2007. Following the adoption of the Core Strategy in 2012, some UDP policies were replaced, but remaining policies sit alongside the Core Strategy to form the Local Plan for Bexley</p>
<p><a href="#">Affordable Housing SPD</a></p>	<p>Clarifies and supports housing policies within the UDP.</p>
<p><a href="#">Design for living – Bexley's residential design guide</a></p>	<p>Seeks to secure the delivery of high-quality housing and neighbourhoods.</p>

## Housing Strategies

### National:

<a href="#">Housing and Regeneration Act 2008</a>	<p>Act to establish the Homes and Communities Agency (now Homes England), a non-departmental public body to fund new affordable housing in England. Aimed to reform social housing and social housing regulation, also implemented a European Court of Human Rights ruling on Gypsy and Traveller sites.</p>
<a href="#">Localism Act 2011</a>	<p>Social housing allocations reform.</p> <p>Social housing tenure reform.</p> <p>Reform of homelessness legislation.</p> <p>National home swap scheme.</p>
<a href="#">Housing and Planning Act 2016</a>	<p>Introduced wide ranging measures to promote home ownership and boost levels of housebuilding including allowing sale of higher value council houses, Starter Homes, Pay to Stay, fixed term tenancies, promotion of self-build and custom build housebuilding, extension of Right to Buy, introduction of permission in principle, creation of Rogue Landlord database and changes to compulsory purchase system.</p>
<a href="#">Housing White Paper 2017: Fixing our broken housing market</a>	<p>Set out the Government's plans to reform the housing market and increase the supply of new homes in England.</p>
<a href="#">Improving access to social housing for members of the Armed Forces</a>	<p>New statutory guidance published in June 2020 for local authorities to improve access to social housing for members of the Armed Forces Community. Published by the Secretary of State for Housing, Communities and Local Government under section 169 of the Housing Act 1996.</p>

**Regional:**

<p><a href="#">Mayor of London's Housing Strategy</a> <a href="#">May 2018</a></p>	<p>Key areas include;</p> <ul style="list-style-type: none"> <li>• Building more homes for Londoners</li> <li>• Delivering genuinely affordable homes</li> <li>• High-quality homes and inclusive neighbourhoods</li> <li>• Fairer deal for private renters and leaseholders</li> <li>• Tackling homelessness and rough sleeping</li> </ul>
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**Local:**

<p><a href="#">Bexley's Corporate Plan</a></p>	<p>Sets out needs and priorities that the Council will adopt to work with partners and wider communities to achieve that vision for current and future generations.</p>
<p><a href="#">Growth Strategy</a></p>	<p>Will help Bexley meet the need for new homes and jobs. It will ensure growth is managed carefully to benefit local people. It will also bring benefits to transport connectivity, economic prosperity and skills.</p>

**Emerging Policy/ Guidance**

**National:**

<p><a href="#">Social Housing Green Paper</a></p>	<p>Published for consultation in August 2018 sets out the Government's vision for social housing to ensure it provides safe, secure homes that are well managed. Consultation closed in November 2018.</p>
<p><a href="#">Planning for the future White Paper</a></p>	<p>The White Paper proposes significant long-term changes to the planning system. Proposals include reviewing how development is planned, bringing a new focus to design and sustainability, reforming how infrastructure associated with development is delivered and ensuring more land is available for development where</p>

	<p>needed. The consultation closed on 29 October 2020.</p>
<p><a href="#">Changes to the current planning system consultation</a></p>	<p>Published in August 2020 this consultation set out proposals for immediate measures to improve the effectiveness of the current planning system. The four main proposals are:</p> <ul style="list-style-type: none"> <li>• Changes to the standard method of assessing housing need</li> <li>• Securing First Homes through developer contributions in the short term until the transition to a new system</li> <li>• Supporting small and medium sized builders by temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing</li> <li>• Extending the current Permissions in Principle to major development</li> </ul> <p>The consultation closed 1 October 2020.</p>

**Regional:**

<p><a href="#">Intend to Publish London Plan</a></p>	<p>A draft new London Plan was published by the Mayor for consultation in December 2017. Following the Examination in Public the Mayor considered the Inspectors' recommendations and, on the 9th December 2019, issued to the Secretary of State his response to the Panel Report and his Intend to Publish version of the draft London Plan. The SoS responded on 13<sup>th</sup> March directing the Mayor to amend the Plan to make it consistent with Government planning policy and to resubmit it to the SoS for consideration.</p>
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**Local:**

<a href="#">Local Plan Review</a>	<p>A new Local Plan for Bexley is currently being prepared. Once adopted, it will form, with the new London Plan, the Development Plan for the borough. Along with setting out planning policies for development over the Plan period to 2036, it also recognises the Growth Strategy ambitions for long term investment and growth. It will set out the best locations for new development and will include policies to protect valued environments and heritage, and ensure high quality, desirable places.</p>
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## Appendix 9: Consultation

Our Housing Strategy sets out how we plan to try and address the borough's housing needs over the next 5 years.

Consultation on the Council's Draft Housing Strategy took place over a 10-week period from 10<sup>th</sup> July to 30<sup>th</sup> September within the restrictions imposed because of the pandemic; as such most of the contact, including stakeholder meetings, was facilitated online. Efforts were made to reach out to as many people, businesses and stakeholders as possible.

### Strategy Consultation

The following consultation methods were used:

- An online accessible smart survey format for the public, council employees, businesses, stakeholders, voluntary and community groups to have their say on the key themes within the Housing Strategy—hard copies were available in the public libraries.
- Press releases, social media, local media such as the News Shopper and our Bexley Magazine.
- Stakeholder meetings with the Leader and Chief Executive and key RP and other partners in the borough as a precursor to the establishment of a Strategic Housing Partnership Board.
- A Strategic Housing Partnership Forum on specialist housing with key RPs and the Leader and Chief Executive.
- An 'Easy Read' version of the Housing Strategy to share with Learning Disability partnership boards and forum.
- Officer meetings with RP partners and the GLA.

### The Housing Strategy and survey was distributed widely to a range of stakeholders:

BVSC

B4B Business newsletter

GLA

BexleyCo

Cory Riverside Energy

Bexley Conservative Group

Bexley Labour Group

Libraries

SERCO

All Bexley Residential Care Homes - Council, private and RP.

RPs working in Bexley and G15 Housing Associations

Housing 21 (RBL) sheltered schemes in Bexley

Developers working in Bexley

Local Government Association

residents in TA

Women's Aid

Staying Put

Clinical Commissioning Group

Housing Services Partner Agencies: Age UK, Crossroads, Memory Service, Evergreen, Inspire Community Trust, Carers Support, Bobby Scheme

Bexley schools

Local Community Leaders

Children's Services partnerships and forums

ASC partnerships and forums:

- Bexley Learning Disability Partnership Board (LDPB)
- LDPB Housing Sub Group
- LDPB Health Sub Group
- LDPB Employment Sub Group
- LDPB Safety Sub Group
- LDPB Co-Production Sub Group
- Carers Partnership Board
- Autism Partnership Board
- SEND Implementation Board

### **The Housing Strategy Online Survey**

The online survey was aimed at people who live, work or study in the London Borough of Bexley (or hope to in the future) as well as local organisations or groups who have an interest in housing and related issues. 293 responses were received. The survey comprised 8 questions which asked respondents to tick the statements they felt were most important. There was also an opportunity to provide further comments. The information provided an insight into what respondents felt was the right type and quality of housing in Bexley and the relative importance of various housing related interventions.

In summary:

**Q1) We want to work with our partners to build the right homes for local people.**

Given the numbers and range of people looking for a home in Bexley, which types of homes do you think we should aim to build?

Responses: In terms of what types of homes we should be building: 'A home to rent from a Housing association at rents which are lower than market rents' was the most popular with 60.55% agreeing (Shared Ownership at 58.13%).

#### Comments Overview:

A clear theme from the comments for this question is the demand for affordable homes for both rent and first-time buyers:

- Private rents are too high and only small numbers in high housing need are able to get housing association rented homes.
- There is a lack of security in the private rented sector.
- There is nothing for anyone else struggling on a low/mid income.
- The Council should enter the market and start building its own affordable stock.
- Homes need to be 'social rent' rather than 'affordable'.
- High deposits can be an issue for first time buyers and some local people are having to look elsewhere – usually further out from London.
- There is some support for the rent to buy model which is perceived as a useful tenure option for those saving to get on the property ladder.
- There is support for suitable, safe accommodation for those with disabilities – 'assisted living' and extra care options.
- Bringing empty properties back into use is seen as very important
- Greater effort is needed to permanently house those that have been in Temporary Accommodation for more than 2 years.

However, there are also comments in opposition to further development – respondents say they are worried about the impact on the character of the neighbourhoods and green spaces

**Q2) We aim to raise the quality of housing and neighbourhoods in Bexley for all our residents. We want to**

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- Tackle poor quality rented housing
- Bring empty homes back into use
- Make sure housing association homes are managed well and better maintained
- Make sure new homes are well designed
- Provide a range of housing options

Please tick the statement(s) you believe are most important.

Responses: In terms of Improving Neighbourhoods and raising the quality of housing and neighbourhoods- the majority agreed with the statement that the Council should 'actively identify empty properties and use a range of support and enforcement to bring them back into use' (66.78%) – 'Provide a range of quality housing options' was also popular (56.05%) and 'BexleyCo to prioritise delivery of affordable homes' (50.17%).

#### Comments Overview:

- New homes must be 'genuinely affordable' for LB Bexley residents.
- 'More public sector/ Housing Association Homes'.
- Strategy requires a 'multi-pronged approach' to approving quality and types of homes in the borough
- Desire from some commenters to 'bring back Council run homes' and that Council housing needs to always be replaced.

- Although it was also highlighted in the comments that many of the affordable housing in the borough is in a poor state of repair.
- Other statements included the 'Need to regulate private tenancies'.
- Some comments are against the building of more housing in the borough – 'infrastructure available in the Borough simply can't take any more housing'.

**Q3)** As set out in our Growth Strategy adopted in 2017, we plan to play a key part in helping London grow sustainably, while continuing to respect the borough's character and identity. We have a key role in shaping local communities to ensure that the people who live in them are connected, happy and prosper.

Please tick the statement(s) you believe are most important.

Responses: All the options were broadly agreed with – the most important amenities for ensuring local communities prosper are: health facilities (81.18%), access to green space (78.40%) and good transport connections (72.47%).

Comments Overview:

- Prioritising the environment and the importance of greener methods of transport – 'Public transport and safe cycling and pedestrian routes should take priority over roads for private motor vehicles'
- 'Stop building on local parks' was a key theme – green spaces seen as very important for mental health etc.
- Proportional increase in health facilities important as population increases
- Better Policing for safer neighbourhoods
- Improved transport connections for the borough is important
- Investment in Communities - local interventions might be better than a borough wide approach

**Q4)** We have prepared a draft Homeless Strategy for public consultation later this year, but it is also an important element of our Housing Strategy.

Please tick the statement(s) you believe are most important.

Responses: In terms of the Homelessness question, prevention of Homelessness occurring in the first place 'through advice and mediation' – was the most popular response with 71.18% believing this to be the most important statement. 56.60% also support reducing dependence on TA.

Comments Overview:

- Important to deal with the causes of homelessness and implement strategies to combat this
- Some comments asked for a more holistic approach from the Council – enhancing the work with local charities and support organisations GPs and NHS Trust to signpost individuals, families or households as 'at risk of homelessness'.
- support for Care Leavers to enable them to live independently
- Important to ensure that Temporary Accommodation is in fact 'temporary' and that tenants are not in these properties for long periods of time.

- Ensure that increasing the supply of affordable accommodation is a priority.
- Support for homeless individuals is paramount – ‘There should be help from libraries and community venues to help homeless people find accommodation, work and support’.
- Some people disagreed with the council sourcing homes from outside the borough – ‘Homes outside the borough do not help people, children may have to change schools. People may not be able to get to work and be cut off from family support.’
- Suggestion of building our own social housing – ‘cheaper and easier’

**Q5)** The aim of our Housing Strategy is to enable older people to feel safe and secure in a place they call home, living independently for as long as possible.

Please tick the statement(s) you believe are most important.

Responses: ‘Being connected to a local community and network of social support’ (72.14%) and ‘availability of physical adaptation’ (72.41%) are seen as the most popular options for enabling older people to feel safe and secure.

#### Comments Overview:

There is general support for all measures given the ‘ageing population’

- ‘Older and vulnerable customers worry about the availability of decent, affordable housing’.
- Cost is a big factor - ‘Extra care is very expensive’, affordable options are needed.
- The Importance of ‘outside garden space’ was cited as an important factor.
- ‘There are few new properties built for older residents that are not in blocks of flats. Some older residents’ value and enjoy some outside garden space, it is good for their wellbeing and exercise to be able to use and look after their gardens but is difficult to find affordable properties like this.’

**Q6)** What is, or would be, the main issue that would prevent you from moving home in your later years?

Responses: ‘Cost of moving’ (48.78%) and ‘lack of alternative affordable accommodation’ (48.43%) are considered the biggest barriers to moving home in later years.

#### Comments Overview:

A range of issues were touched on in the comments received.

- The high cost and lack of availability of bungalows was mentioned
- Desire to have a garden or green space/ take and look after pets
- Locational issues – no availability in desired locations (e.g. Bexley Village) and a need to be near family/ support networks – some respondents would not want to move somewhere they didn’t know
- The cost and affordability of private sheltered accommodation is seen by some to be a major barrier to moving

**Q7) What would encourage you to move to a smaller property in your later years?**

Responses: In terms of encouraging people in later years to move to a smaller property –more choice in types of accommodation (52.31%) and financial assistance (49.82%) are the two most popular responses. Only 15.66% said nothing would encourage them to move.

Comments Overview:

- The high cost and upheaval were mentioned by some as a barrier to moving
- Attractive, smaller properties such as bungalows are popular
- More information on housing options for older persons at an early stage would be useful
- Some respondents objected to the perception that the Council wanted to encourage older people to downsize - some strong feeling in the comments that those who have worked hard their whole lives to buy the house they wish to live in should have the right to decide where they want to live regardless of the size of the property

**Q8) Our ambition is to offer a range of housing options that meet the different needs of our residents. We know that some residents could afford to buy their own home if there were more affordable products available.**

Please tick the statement(s) you believe are most important.

Responses: Quite a lot of support for Shared Ownership/ London Living rent on the affordable home ownership question – 60.07% agreed with this option, with priority for Bexley residents when marketing also a popular response with 55.90% in agreement, as is Council encouraging options that enable you to rent first and buy later when your income allows it (53.13%)

Comments Overview:

- Shared Ownership can be unaffordable to local residents
- The amount needed for deposits was highlighted as an obstacle to home ownership.
- Affordability is crucial. One person asks the Council to: 'Look after the locals more. Too many are being forced to move miles away from family. A one bed flat for private renting at £900 a month when you're on £28k a year is impossible- more needs to be done.'
- Support for Bexley residents getting priority
- Support for measures that will help 'our young people to get on the property ladder'

In general, the responses reflected the ambition of the Housing Strategy to provide a mix of housing, using its ability to build homes itself and influence development by housing providers and developers. When asked what homes the Council should be building, affordability is clearly a concern with the majority of respondents choosing affordable homes for rent through housing associations, closely followed by shared ownership as their preferred tenure. Many of the comments highlighted expensive rents and a lack of security in the private rented sector as a reason for their alternative tenure preference.

In terms of sustainable neighbourhoods and strong communities access to health facilities and green space are popular. There is also an awareness that further growth needs adequate infrastructure but concern that too much development could negatively impact on the character of established neighbourhoods. For older people and those with specialist housing requirements, community and a network of social support is seen as important in enabling them to feel safe and secure.

### **Stakeholder Consultation**

Our RP partners showed a high level of support for the aims and aspirations of the Council's Housing Strategy. There is recognition and support for the importance of Theme 1 - partnership working, as key to helping the Council meet its housing challenge. The Council is acknowledged for being 'open', approachable and a strategic enabler. There is widespread support for and commitment to active membership of a Strategic Housing Partnership Board, and a desire to involve appropriate senior officers across the disciplines of management, maintenance and development.

There is support to explore further opportunities for shared ownership and 'rent to buy' (London Living Rent) particularly where this helps to create mixed and thriving communities. London Living Rent is an affordable housing product introduced by the Mayor of London for middle-income households who now rent but want to build up savings to buy a home.

These affordable housing products can and should be actively marketed first to Bexley residents to ensure they help meet the existing local need. RP experience of earlier iterations of the rent to buy product has enabled a refinement of procedures particularly on initial vetting, allocations and management to make the best use of these homes to meet local housing need. RPs are aware of the importance of robust assessments at the outset to ensure households can comfortably progress from rent to buy.

Opportunities also exist to explore intensification of existing assets in the borough, particularly where these are within or adjacent to town and neighbourhood centres. Sheltered housing blocks, for example, are often low rise and have some capacity for renewal and intensification.

Reference is made to the importance of BexleyCo, the Council's wholly owned development company. BexleyCo is helping the Council to deliver its vision for housing in Bexley with an agreed strategy of delivering 1,200 exemplary new market and affordable homes over the next 10 years with the ambition to increase to 2,500.

The feedback from stakeholders and RPs has provided their expert insight into the impact of the pandemic on the current housing market and future use of their housing stock. Whilst RPs and developers report that the trajectory of interest in market sales has been maintained over the summer with the stamp duty 'holiday' supporting the sales market; there is significant uncertainty and increased caution within the financial market amidst reports of reduced future borrowing capacity. Further tiered lockdowns will impact on market sentiment and appetite particularly for shared ownership products and RPs will be closely monitoring current and future sales.

The availability of mortgage products is hardening with lenders reluctant to lend to applicants on the Government's furlough scheme and/or asking for greater levels of equity for deposits.

The broader risk profile within the market is likely to impact RPs capacity to develop now with most reviewing their new commitments for the next 6-18 months.

RPs have reported that they struggle to make the London Affordable Rent work as a tenure with the current level of grant rates. The current model requires them to subsidise each new home; a RP highlighted that they are currently investing at least an additional £50k to deliver each unit.

Partners also shared that viability remains an issue (as land costs and land values are relatively low in Bexley but build costs are relatively high). In addition, following the Grenfell Tower fire, RPs have been required to review the fire safety of external cladding and insulation and all fire stopping measures in their housing stock. Works for taller buildings (over 18 metres) have been prioritised and the high cost of remediation works has meant RPs may reduce the number of new affordable homes they are able to build.

The Building Safety and zero carbon agenda requirements also add to the significant impact on RP resources. The Building Safety Bill sets out proposals for stricter regulation of fire and structural safety as well as changes to the building regulations that will apply to all building work, both new development and refurbishment. The proposals cover the performance of all buildings and those who work to design, build and maintain them. This will increase development costs and will have an impact on the number of new homes RPs are able to deliver. Achieving the zero-carbon target by 2050 will also be a financial challenge for RPs as existing homes will need to be retrofitted and new build housing will need to meet higher standards.

There is recognition that every single housing nomination counts and that local lettings plans have an important part to play delivering viable, cohesive neighbourhoods. There needs to be continued strong partnership working with RP's to ensure the housing register and choice-based lettings scheme provides appropriate outcomes for those who are in most housing need.

RPs requested that the allocations process be looked at on both sides to speed up response times, including assessments for independent living offers and improve the take up of nominations, including the use of voids on regeneration schemes for use as temporary accommodation. This process has already started via the new management structure in place. Direct offers can be reconsidered, and this approach can assist with the prioritisation of homes for the vulnerable and those who have been in temporary accommodation for some time. This will be picked up in the allocations review which will report back to Cabinet in February.



## **APPENDIX 7**

# London Borough of Bexley Strategic Housing Market Assessment 2021

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London Borough of Bexley

Final Report  
November 2021

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# Executive Summary

## Introduction

The Borough of Bexley Strategic Housing Market Assessment 2021 (SHMA 2021) provides the latest available evidence to help to shape the future planning and housing policies of the area. The 2021 SHMA covers the period 2018 to 2038. The 2021 SHMA is based on the 2018 and 2020 SHMAs and takes into account the revised housing target for Bexley as set out in Table 3.1 of the 2021 London Plan dated March 2021 which identifies that a 10 year net target is 6,850. This equates to an annual target of 685 over the period 2019/20 to 2028/29.

The 2021 SHMA will help inform the production of the Council's Local Plan and the Housing Strategy along with supporting the work of the Council and its partners. It considers the affordable housing needs of households, the aspirations/expectations of those households moving in the market, and the need for particular types of dwelling by virtue of age or disability. This research provides an up-to-date analysis of the social, economic, housing and demographic situation across the area.

The 2021 SHMA is based on the content and structure of the 2018 SHMA which comprised:

- A major Household Survey in 2018 which was completed by 3,408 households, representing an 11% response rate from the sample surveyed;
- An online survey of stakeholders;
- Engagement with people requiring supported housing;
- Interviews with supported housing, adult social care and older person professionals;
- Interviews with estate and letting agents; and
- A review of existing (secondary) data.

The findings from the study provide an up-to-date, robust and defensible evidence base for policy development, in accordance with government policy and guidance.

Whilst much of the evidence in the 2021 SHMA report is based on the 2018 SHMA, future housing need calculations are measured over a 2021-2031 time period and based on the latest available data.

## Housing market context

### Dwelling stock

There are an estimated 98,599 dwellings across the Borough in 2021 (source: MHCLG Dwelling Stock LT100). 1,445 (1.5% are vacant which compares with 2.7% across England and 505 (0.5%) are long-term vacants (source: MHCLG Dwelling Stock Vacancy LT615).

The 2018 Household Survey shows that:

- 70.3% of occupied properties are houses, 24.3% are flats/maisonettes, 4.9% are bungalows and 0.5% are other property types (e.g. caravans);

- 11.2% of occupied properties have one bedroom/studio, 24.9% have two bedrooms, 44% have three bedrooms and 19.9% have four or more bedrooms;
- 9.8% of occupied properties were built before 1919, a further 44% were built between 1919 and 1944, 17.5% between 1945 and 1964, 14.1% between 1965 and 1984, 9.1% between 1985 and 2004 and 5.5% have been built since 2005; and
- 72.5% of occupied properties are owner-occupied, 14.2% are affordable (social/affordable rented or shared ownership) and 12.2% are private rented (or tied accommodation).

## House prices and rents

In 2020, lower quartile prices across the Borough of Bexley were £295,000 (London £350,000, England £164,000) and median prices were £360,000 (London £477,500, England £249,000) (source: Land Registry Price Paid Data)

In 2020, lower quartile private rents were £949 each month (London £1,274, England £724) and median rents were £1,200 (London £1,651, England £1,148) (source: Zoopla Price Paid Data).

## Demographic drivers

The population of Bexley is estimated to be 249,301 in mid-2020 (source: ONS Mid-year population estimates 2021). By 2038, the population is projected to be 268,180 (source: 2018-based ONS population projections). Over the next few decades, there will be a marked increase in the number and proportion of older residents. The population aged 65+ years is expected to increase by 33.3% from 40,764 in 2018 to 54,321 in 2036 (source: ONS 2018-based Subnational Population Projections).

## Economic drivers

The 2018 Household Survey found that, across the Borough of Bexley, 66.9% of Household Reference People are economically active and a further 21.6% are retired from work. The 2018 Household Survey identified that across the Borough 25.4% of households receive less than £18,200 gross per year, 48.6% receive between £18,201 and £49,400 per year, 21.3% receive between £49,401 and £101,400 per year and 4.7% receive at least £101,401 per year.

## Dwelling need, type and mix

The 2021 London Plan has established a target for 6,850 net new dwellings across the borough over the 10-year period 2019/20 to 2028/29 or an annual average of 685 dwellings.

Using the government's 'standard method' for calculating housing need which takes into account demographic change and affordable need, the minimum annual housing need is 1,295 for the period 2021 to 2031. This calculation incorporates the annual housing requirement identified in the 2021 London Plan which caps the level of need to 959 dwellings each year. However, a 35% cities uplift is applied to London Boroughs which results in the higher 1,295 figure. Planning Practice Guidance says 'it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy

assumption that this level of need will be met within the individual boroughs. (Paragraph: 034 Reference ID: 2a-034-20201216).

Detailed analysis of the relationship between households and their current housing circumstances, the future aspirations of moving households and what households would accept has been carried out. This helps to set out the range of dwellings by type and size appropriate over period 2018 to 2038. Table ES1 illustrates the proportion of dwellings by tenure appropriate for Bexley.

Analysis has also considered the need for affordable housing and an annual net imbalance of 1,378 has been calculated. This is a marked increase on the 965 evidenced in the 2018 SHMA and is due to increasing house prices and rents along with a reduction in affordable lettings.

In terms of new build, the policy requirement is for developers to provide a minimum of 35% affordable housing. The 2021 London Plan recommended a strategic requirement of 50% of dwellings to be affordable. A 50% affordable target is assumed in analysis and in terms of the split between social/affordable rented and intermediate tenure products, evidence continues to recommend a 70% rented and 30% intermediate tenures split.

<b>Table ES1 Overall dwelling type/size and tenure mix under baseline demographic scenario</b>				
<b>Dwelling size</b>	<b>Market (%)</b>	<b>Affordable Rented (%)</b>	<b>Affordable intermediate (%)</b>	<b>Total</b>
1 or 2-bedroom house	19.2	30.5	30.4	23.1
3-bedroom house	35.2	12.6	31.4	29.2
4 or more-bedroom house	21.2	4.9	10.5	16.1
1-bedroom flat	3.8	13.6	7.6	6.6
2 or more-bedroom flat	7.5	20.5	11.2	11.1
1-bedrom bungalow/ level-access	0.1	1.3	0.7	0.5
2-bedroom bungalow/ level-access	6.5	7.6	2.0	6.3
3 or more bedroom bungalow/ level-access	4.2	1.8	1.8	3.3
Other	2.3	7.4	4.5	3.8
<b>TOTAL</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Dwelling type</b>	<b>Market (%)</b>	<b>Affordable Rented(%)</b>	<b>Affordable intermediate (%)</b>	<b>Total</b>
House	75.6	47.9	72.3	68.4
Flat	11.3	34.0	18.8	17.7
Bungalow/level-access	10.9	10.7	4.4	10.1
Other	2.3	7.4	4.5	3.8
Total	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Number of bedrooms</b>	<b>Market (%)</b>	<b>Affordable Rented(%)</b>	<b>Affordable intermediate (%)</b>	<b>Total</b>
1	5.7	18.6	12.8	9.6
2	32.0	59.3	42.7	39.8
3	41.1	17.3	34.0	34.5
4	21.2	4.9	10.5	16.1
Total	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	100.0

## Older people and people with additional needs

A major strategic challenge for the Council is to ensure a range of appropriate housing provision, adaptation and support for the Borough's older population.

The 2018 Household Survey found that the majority of older people (58.8%) want to stay in their own homes with help and support when needed and around a quarter (25.6%) would consider buying a property in the general market. Generally, 10-15% would consider specialist provision such as sheltered housing and Extra Care housing in the form of flats and bungalows/level-access dwellings. Around 5% would consider a residential care home.

Currently there are around 3,644 units of specialist older person accommodation including around 1,186 units of residential care (C2) dwellings. Analysis of demographic change would suggest a need for an additional 448 units of residential

care (C2) units and 928 additional units of specialist older person residential (C3) units by 2038.

A key conclusion is that there needs to be a broader housing offer for older people across the Borough and the SHMA has provided evidence of scale and range of dwellings needed.

## People with additional needs

A wealth of information has been assembled from various sources which helps to scope out the likely level of disability across the Borough's population. Although it is a challenge to quantify the precise accommodation and support requirements, the SHMA has helped to scope out where needs are arising.

Specific accommodation needs identified include:

- Supported housing for those experiencing mental health challenges and a specific need for individual units within the community with support;
- Specialist learning disability accommodation units as currently people have to live out of the Borough;
- Accommodation for people with learning disabilities who are currently living with aged parents;
- Accommodation for young people with mental health issues leaving home, with a recommendation for a small number of units to be built each year to match need;
- Affordable Extra Care accommodation in town centres;
- Accommodation which is sensitive to the needs of those with dementia and early onset dementia;
- Support for people with drug/alcohol use challenges;
- Need for one-bedroom units for those leaving foster care.

## Optional accessibility and wheelchair standard housing

The 2018 Household Survey indicates that 5.4% of households live in properties that have been adapted or purpose built for those with an illness/disability. Analysis of demographic data would suggest that the number of adapted properties will need to increase by 927 over the 2018 to 2038 period.

New build housing will play a role in providing additional adapted dwellings and the Council has adopted the London Plan policy D7 Accessible Housing. This is to ensure that:

- At least 10% of dwellings (which are created via works to which Part M Volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user' dwellings.
- All other dwellings (which are created via works to which Part M Volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

# 1. Introduction

## Background

- 1.1 The London Borough of Bexley Strategic Housing Market Assessment (SHMA) 2021 has been commissioned by the London Borough of Bexley Council ('the Council') to provide an up-to-date evidence base to inform the development of the Council's Local Plan and the Housing Strategy in particular, along with supporting the work of the Council and its partners.
- 1.2 The Borough of Bexley SHMA 2021 updates the 2018 SHMA and supports the requirements of the National Planning Policy Framework. It is also prepared in compliance with the Government's Planning Practice Guidance (PPG) and takes into consideration the standard methodology for assessing housing need.
- 1.3 The SHMA report is tailored to the unique characteristics and needs of the Borough and the role it has within the wider London Housing Market Area. It provides the Council with guidance on the extent of overall housing need within the Borough, in terms of type, tenure and size, as well as the need for affordable housing and the specific housing needs of particular groups.
- 1.4 The 2021 SHMA is accompanied by a report prepared by Edge Analytics 'London Borough of Bexley Demographic Update' which provides up to date demographic evidence.

## Aim

- 1.5 The overall aim of the SHMA is to provide a sound and robust evidence base, setting out the need for housing in the Borough, from which Bexley can form strategic housing policies for the upcoming Local Plan and Housing Strategy.

## Objectives

- 1.6 The objectives of the 2018 SHMA remain relevant for the 2021 SHMA. Specifically, the SHMA evidence base:
  - a) determines the objectively assessed housing needs of Bexley to the year 2038, consistent with national planning policy, guidance and good practice, whilst considering the specific challenges Bexley faces as a London Borough;
  - b) assesses housing need in the specific context of the Borough by exploring local issues, as well as making comparisons with national, regional and sub-regional data;
  - c) provides robust evidence to inform future Local Plan and Housing Strategy policies that aim to ensure the appropriate mix of housing, including type, tenure and size, to achieve sustainable communities;
  - d) identifies the need for affordable housing of all types and tenure, having regard to the definitions found in the Mayor of London's 'Homes for Londoners: Affordable homes programme 2016-2021' SPG (2016);
  - e) identifies the housing needs of specific groups, including:
    - i) people wishing to build their own homes



- ii) older people
  - iii) people with disabilities including learning disabilities
  - iv) service families
  - v) black, Asian, and minority ethnic (BAME) groups
  - vi) gypsies and travellers
  - vii) key workers
  - viii) people leaving foster care
  - ix) people on the housing register
- f) identifies the needs across the Borough for specific types of housing, including:
- i) family housing
  - ii) houses in multiple occupation (HMOs)
  - iii) private rented sector (PRS)
  - iv) student accommodation
  - v) co-living
  - vi) supported living (including those types falling under C2, C3(a) and C3(b))
- g) give consideration to the joint 2014 South East London SHMA, SHMAs from other nearby London Boroughs, and the SHMAs of neighbouring local authorities outside of London, consistent with the duty to cooperate;
- h) give full regard to the 2013 London SHMA, 2017 London SHLAA, and the monitoring targets found within the London Plan.

## Government policy and guidance

- 1.7 The evidence base needs to take account of the requirements of the National Planning Policy Framework (NPPF). The latest version was published in July 2021 and supported by Planning Practice Guidance (PPG). The NPPF 2021 sets out the government’s planning policies for England and how these are expected to be applied. Paragraph 11 of the NPPF states that plans, and decisions should apply a *‘presumption in favour of sustainable development’*. As part of this, in relation to plan-making, it sets out that this means *‘that strategic policies should, as a minimum, provide for objectively assessed needs for housing...’*.
- 1.8 Paragraph 60 provides an important context to the policy for housing delivery, as follows:
- ‘To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.’**
- 1.9 Paragraphs 61 to 63 relate to the evidence base requirements which underpin this study:
- Paragraph 61: **‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative**

**approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'**

**Paragraph 62: 'Within this context, the size, type and tenure of housing need for different groups in the community, should be assessed and reflected in planning policies including but not limited to: those who require affordable housing; families with children; older people; students; people with disabilities; service families; travellers; people who rent their homes; and people wishing to commission or build their own homes.'**

- 1.10 Paragraph 63: 'where a need for affordable housing is identified, planning policies should specify the type of affordable housing required'. Paragraph 65 requires that: 'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.'**
- 1.11** The Localism Act 2010 introduced the 'Duty to Co-operate' as a replacement for Regional Spatial Strategy and this requirement is also established in National Planning Policy (NPPF 2021, Paragraphs 24-27). Section 110 requires local authorities and other bodies, including Local Enterprise Partnerships to co-operate in maximising the effectiveness of strategic matters within development plan documents. The provision of housing development is a strategic priority and the Council will have to ensure that it is legally compliant with the Localism Act at Local Plan examination.
- 1.12** In the case of London Boroughs, the Greater London Authority (GLA) is the strategic regional authority, with powers over various functions including planning. The London Plan therefore forms part of the statutory development plan for the Borough of Bexley.
- 1.13** Relevant PPG which relates to the SHMA evidence base includes:
- Housing and economic needs (with specific focus on affordable housing need);
  - Housing needs of different groups;
  - Housing for older and disabled people; and
  - Housing optional technical standards.
- 1.14** Of particular note, the standard method for assessing minimum housing need was updated in December 2020.
- 1.15** In the case of London Boroughs, the Greater London Authority (GLA) is the strategic regional authority, with powers over various functions including planning. The London Plan therefore forms part of the statutory development plan for the Borough of Bexley.

## Definitions

- 1.16 Definitions relating to affordable housing have been updated in NPPF 2021 Annex 2 and set out in Appendix B.
- 1.17 In addition, this SHMA recognises a further range of tenures which are being promoted by the Mayor of London in the Draft New London Plan:
- Homes based on **social rent** levels (which includes London Affordable Rent);
  - **London Living Rent** which offers Londoners on average incomes a below-market rent, enabling them to save for a deposit. The Mayor has set out London Living Rent levels that vary by ward across London, set at a third of local average household incomes. When funded through the Mayor's Affordable Homes Programme, London Living Rent is designed to offer sub-market rents for up to 10 years, helping households to save for a deposit. Eligibility is restricted to households that are currently renting, with a maximum income of £60,000 and who are not currently able to purchase a home (including through shared ownership) in the local areas; and
  - **London Shared Ownership** is based on the national shared ownership model but with extra assurances for Londoners over service charges.

## Strategic context

### National context

- 1.18 The housing policy landscape is entering a period of unusual fluidity and uncertainty. This fluidity is set to last for several years. Factors such as Brexit and the pandemic have been further complicated by the forthcoming Comprehensive Spending Review and the recent change in leadership in the rebranded Department for Levelling Up, Housing and Communities.

### Comprehensive Spending Review

- 1.19 Due at the end of October 2021, it is probable that capital investment will continue to flow post-CSR, although retrenchment of public revenue spending e.g. welfare benefits, social landlord rent increases etc. may well erode the momentum of the wider recovery in house prices and social landlord development.

### Implications of the Cabinet changes

- 1.20 The outcomes of the recent cabinet changes are yet to be formalised. Whilst commentators suggest a withdrawal from the target aspects of the "White Paper" the legislative slot for a Bill will probably be filled by proposals that overlap with the less controversial aspects of the "White Paper" e.g. slimmed down Local Plan processes, emphasis on design, etc. Aspects of the levelling up agenda are also likely to be formalised.
- 1.21 At this stage, it appears that long trailed proposals like First Homes and the new model shared ownership may well continue as key aspects of the

affordable housing development policy. The First Homes product has been welcomed by private developers. However, there was some drawing back by Robert Jenrick, so that product may have less prominence going forward.

## Building Safety Bill

- 1.22 The post-Grenfell Bill will apply to buildings of seven storeys or at least 18 metres in height. It has reached the committee stage in the House of Commons. It will:
- establish a legal regime to oversee higher-risk buildings;
  - and establish a Building Safety Regulator to drive improvements in building safety and performance standards in *all* buildings;
  - ensure residents have a stronger voice in the system, and establish additional protections for leaseholders in relation to financing remediation works;
  - create a new Homes Ombudsman Scheme;
  - increase access to redress through the Defective Premises Act 1972;
  - strengthen the obligations under The Regulatory Reform (Fire Safety) Order 2005; and
  - provide a stronger and clearer framework for oversight of construction products.

## Climate change

- 1.23 Climate change will increasingly impact on current and future housing. The COP26 Climate Summit will generate much new policy. The government has already determined to legislate to cut emissions by 78% by 2035 compared to 1990 levels. They also announced a Ten Point Plan for a £12 billion Green Industrial Revolution to accelerate the net zero transition and support up to 250,000 green jobs. For example, work is starting on a Glass Futures research facility to reduce the carbon footprint of glass making. Ahead of COP26, proposals will be announced that include a Net Zero Strategy.

### National Housing Market changes

- 1.24 Although not a policy change, and whilst it is too soon to be definitive, the pandemic may be generating new and significant structural alterations in housing markets. It will be important that the pre-pandemic aspirations of extant policies are recalibrated in the light of four emerging phenomena:
- the so called “race for space” linked in part with the emergence of more remote working;
  - the persisting aspiration for out of town housing in less populated locations;
  - the decline in town centre retail and replacement with web based purchasing; and
  - possible changes in Higher Education residential requirements driven by more remote teaching approaches.
- 1.25 The lack of job security, lower employment and lower economic activity are predicted to depress sale prices in the medium term. Shortages in skilled (HGV

drivers) and unskilled labour (crop pickers) and inputs (gas) combined with supply chain shortages suggest an increase in house prices and slower house building in the coming months.

## London Plan

- 1.26 The 2021 London Plan is the statutory spatial development strategy for Greater London, prepared by the Mayor of London. This is the adopted development plan and is a material consideration in planning decisions. The Plan covers the period to 2041 and sets out an integrated framework for the development of the whole of London, taking into account economic, environmental, transport and social factors.
- 1.27 The London Plan (Intend to Publish) seeks to be ‘different’ to previous plans (paragraph 0.0.18):
- ‘It is more ambitious and focused than any previous London Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the London Plan and ensures that it is focused on sustainable development.
- 1.28 **Policy GG4 Delivering the homes Londoners need** seeks to create a housing market that works better for all Londoners. Those involved with planning and development must ensure that more homes are delivered and support the delivery of the strategic target of 50% of all new homes being genuinely affordable. The supporting text to Policy GG4 draws on the findings of the London Strategic Housing Market Assessment 2017, setting out that London needs 66,000 new homes each year for at least 20 years, of which 43,000 should be genuinely affordable.
- 1.29 **Policy H4 Increasing Housing Supply** and associated Table 5.1 sets out ten-year targets for net housing completions that each local planning authority should plan for. For Bexley, Table 3.1 of the Plan establishes a target for 6,850 dwellings or an annual average of 685 dwelling completions each year .
- 1.30 **Opportunity Areas** are identified in the London Plan as places that offer scope for change and growth, including new homes and jobs. The scope for growth is strongly linked to existing or potential transport improvements. The Opportunity Areas identified within Bexley are:
- Bexley Riverside, and
  - Thamesmead and Abbey Wood.

## Thames Gateway

- 1.31 The London Borough of Bexley is part of the wider Thames Gateway, an area that extends north and south along with River Thames from London into the estuary. The Thames Gateway is identified as a key regeneration opportunity in the London Plan and other strategies, following the 2012 Olympics and the establishment of the Thames Estuary 2050 Growth Commission.

## Local context

- 1.32 The South East London Strategic Housing Market Assessment (SHMA) was undertaken by Cobweb Consulting on behalf of the South East London Housing

Partnership (published in June 2014), covering the five Boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark. The South East London SHMA identified a requirement for just under 7,200 dwellings per annum over the 2011-2031 period. However, it also identified a backlog of unmet need for affordable housing in South East London, identified at around 55,500. For Bexley, the SHMA evidenced an annual affordable shortfall of 837 each year, with a delivery of 2 and 3 bedroom affordable dwellings and a tenure split of 66% rented and 34% intermediate tenure.

- 1.33 The Borough of Bexley Local Plan includes the Core Strategy (adopted February 2012) and current policies set out in the Unitary Development Plan (UDP) (adopted 2004 but including Addendums 2007 and 2012).
- 1.34 The Council has started work on the preparation of a new Local Plan that will guide future development in the Borough up to 2040.
- 1.35 In 2015, the London Borough of Bexley and the GLA published the **Bexley Growth Strategy: Direction of Travel Document**, a joint statement of intent on the process on producing the Growth Strategy and planning framework. This set out that Bexley's Growth Strategy should be a material consideration, informed by the London Plan and informing and influencing the emerging Bexley Local Plan.
- 1.36 The Council adopted the Growth Strategy in December 2017, the first major document in updating the Local Plan documents. The Growth Strategy sets out the Council's strategic vision and objectives for the Borough's future development, seeking a '**positively managed**' approach to '**good growth**'.
- 1.37 Part III of the Growth Strategy (paragraph 5.2.8) sets out that a trajectory for the housing high growth capacity has been prepared:  

'Proposed housing growth of up to 31,500 new homes, with a large amount of the potential development not taking place until triggered by the completion of major transport infrastructure...'
- 1.38 The key infrastructure projects that will act as triggers for growth are identified as follows (paragraph 5.3.6):
  - the completion of a public transit corridor, in phases, from North Greenwich to Slade Green;
  - the completion of a docklands light rail (DLR) extension from Gallions Reach through Thamesmead to Belvedere;
  - the extension of the Elizabeth Line (Crossrail) east of Abbey Wood towards Ebbsfleet; and
  - the completion of road based river crossings connecting Belvedere with Rainham and Thamesmead with Gallions Reach.
- 1.39 In addition to the Borough-wide priorities, the Growth Strategy has a focus on the main growth areas of Thamesmead, Belvedere, Erith, Slade Green and Crayford, along with Bexleyheath, Sidcup, Welling and Foots Cray. The Growth Strategy sets out the vision and objectives for each of the growth areas.

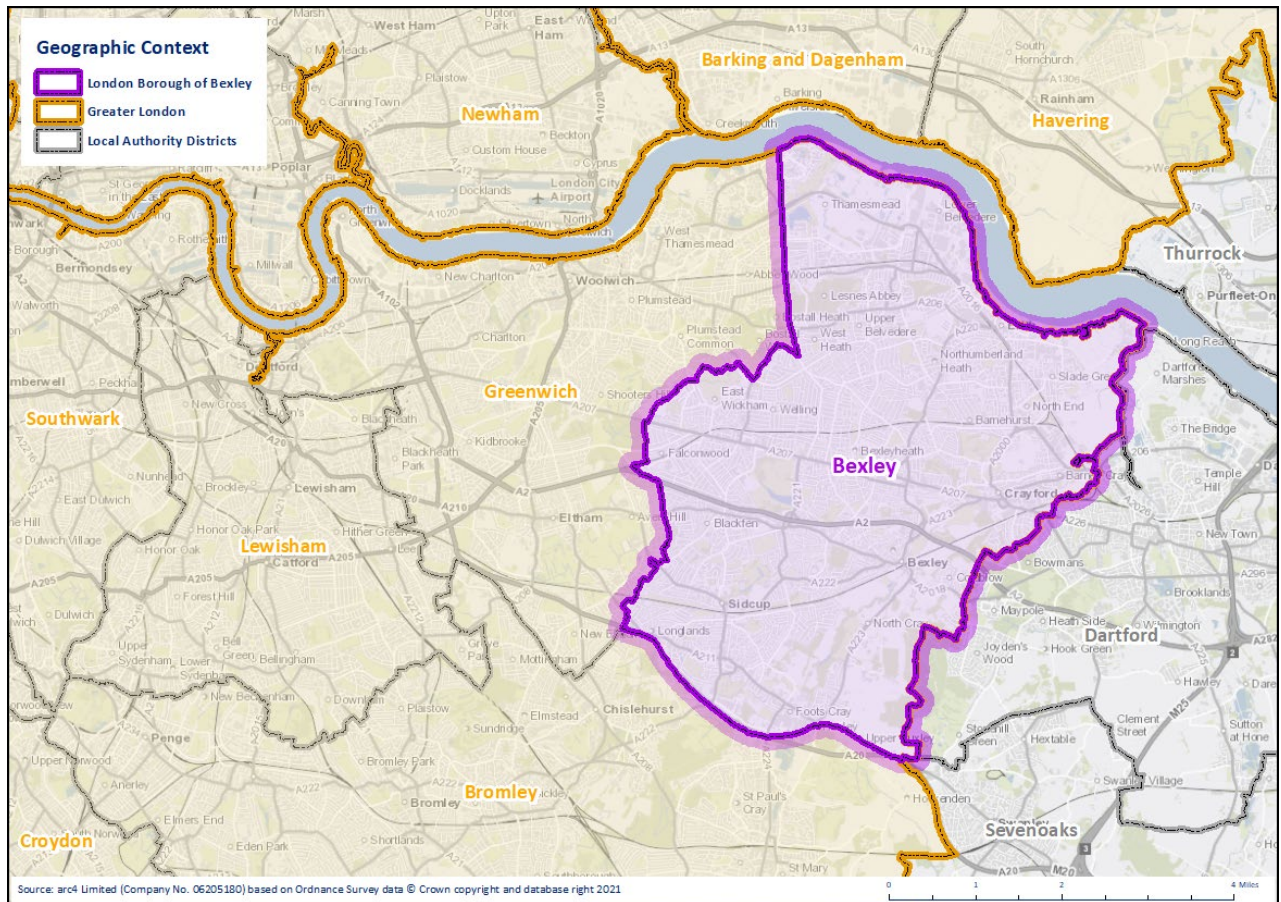
## COVID-19 impact

- 1.40 Regarding the COVID-19 situation, it is too early to consider the longer-term implication of the pandemic on demography, economy and housing but there are several emerging trends. The pandemic has accelerated trends in home working, retail and office use. There are implications for the housing offer, with a ‘race for space’ *within* dwellings, the need for larger gardens/outdoor space and better access to public space which may alter the demand/need for larger homes in less dense settings. A redistribution of demand between urban and more rural locations has also been suggested. Repurposing town centres and commercial buildings provides opportunities for new forms of residential occupancy, for instance micro-homes and co-living. The Edge Analytics report provides some useful indicators showing the impact of COVID-19 on workplace, travel and the use of amenities such as shops and parks.

## Geography

- 1.41 Map 1.1 illustrates the geographical context of the Borough of Bexley and the neighbouring local authorities.
- 1.42 The Borough of Bexley is located within south east London in the south east of England. The resident population of the Borough is estimated to be 249,301 in 2020 (source: Office for National Statistics mid-year population estimates). To the west the Borough of Bexley borders the London Borough of Greenwich, and to the south the London Borough of Bromley. The River Thames lies to the north, beyond which are the London Borough of Havering and the London Borough of Barking and Dagenham. Beyond the Thames to the north east there is also a small boundary with Thurrock, a unitary authority in the county of Essex. To the east lies Dartford, to the south of which is Sevenoaks, both of which are districts within the county of Kent.
- 1.43 Settlements within the Borough include locations that were older-established villages and hamlets such as Bexleyheath, Erith, Foots Cray, Welling, East Wickham, Belvedere, Barnes Cray and North Cray. Thamesmead was built as a new town on the Erith Marshes. Much of the wider Borough has experienced suburban development, with settlements including Albany Park and Barnehurst, whilst other areas reflect their previous farmland function: Blackfen, Northumberland Heath and West Heath.
- 1.44 In terms of access, the main road-routes through the Borough are the A2 trunk road, the A20 (Sidcup Bypass), the A207 (Watling Street), the A206 (to Woolwich and Dartford) and the A2016 (through Thamesmead). Three suburban trainlines pass through the Borough, the North Kent, Bexleyheath and Dartford Loop lines. There are currently no London Underground, London Tramlink or Docklands Light Railway (DLR) services within the Borough. However, Abbey Wood station in Bexley will benefit from a Crossrail service direct into central London and Paddington with a central section (which will form part of the Elizabeth Line).

**Map 1.1 The Borough of Bexley geographical context**



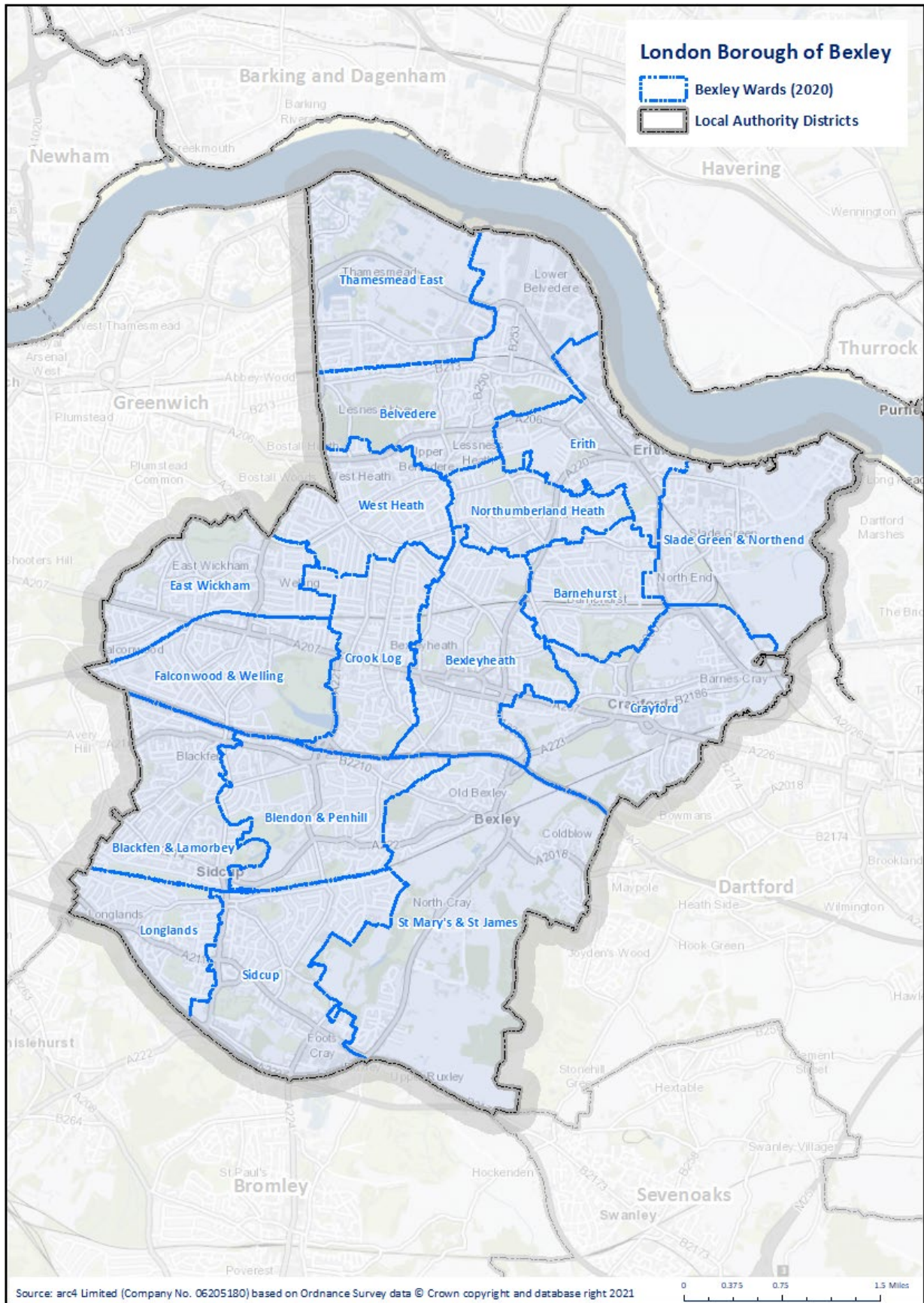
1.45 Household survey data is available down to postcode level and for the purposes of this report, data has been presented based on new wards (Table 1.1) and shown in Map 1.2.



**Table 1.1. Summary of wards**

Barnehurst Ward	Crayford Ward	Northumberland Heath Ward
Belvedere Ward	Crook Log Ward	Sidcup Ward
Bexleyheath Ward	East Wickham Ward	Slade Green & Northend Ward
Blackfen & Lamorbey Ward	Erith Ward	St Mary's & St James Ward
Blendon & Penhill Ward	Falconwood & Welling Ward	Thamesmead East Ward
	Longlands Ward	West Heath Ward

**Map 1.2 Wards within the Borough of Bexley**



## Research methodology

- 1.46 The 2021 SHMA is based on the 2018 SHMA. A multi-method approach was adopted in the 2018 SHMA which comprised:
- A sample survey of households across the Borough of Bexley area was undertaken, with 31,000 households in the Borough contacted during March and April 2018 and invited to complete a questionnaire. 3,408 questionnaires were returned and used in data analysis. This represents a 11% response rate overall and a sample error of +/-1.65 at Borough level;
  - An online survey of stakeholders including 19 representatives from strategic and local organisations;
  - Interviews with supported housing, adult social care and older person professionals;
  - A review of secondary data provided by the Council including housing register and information on groups with additional needs;
  - Interviews with estate and letting agents operating within the Borough; and
  - A review of relevant secondary data including the 2011 Census, house price trends, CORE lettings data and CLG Statistics.
- 1.47 Further information on the research methodology is presented at Appendix A.
- 1.48 Whilst much of the evidence in this updated report is based on the 2018 SHMA, future housing need calculations are measured over a 2021-2031 time period and based on the latest available data. The 2021 SHMA also considers evidence over the period 2018 to 2038.

## Presentation of data

- 1.49 Data presented in this report is based on the 2018 Household Survey carried out as part of the SHMA, unless otherwise stated. Where possible, data are 'triangulated' which means several sources are drawn upon to establish robust output. Where appropriate, data have been updated.
- 1.50 It is important to note that survey responses have been weighted to correct for response bias and then grossed up to reflect the total number of households and this process is explained in Appendix A. All survey information presented in this report is for weighted and grossed responses which are rounded up where appropriate.

## Report structure

- 1.51 The Borough of Bexley SHMA 2021 report is structured as follows:
- **Chapter 2** considers the main features of the housing market dynamics including house price and rental trends, migration and travel to work patterns;
  - **Chapter 3** reviews the current housing stock and provides a detailed analysis of the main tenures;

- **Chapter 4** considers future housing need which takes account of the government’s standard methodology and alternative demographic assumptions;
  - **Chapter 5** considers the need for affordable housing;
  - **Chapter 6** considers household groups with particular housing needs including those with a disability and additional needs;
  - **Chapter 7** sets out an assessment of dwelling type and mix for future housing development within the Borough; and
  - **Chapter 8** concludes the report with a summary of findings and a consideration of strategic issues.
- 1.52 The report includes a technical appendix, which provides detailed material that underpins the core outputs of the SHMA. The technical appendix material includes:
- Research methodology (Appendix A);
  - Affordable Housing Definitions (Appendix B)
  - Housing need calculations (Appendix C);
  - Monitoring and updating (Appendix D);
  - Stakeholder survey (Appendix E).

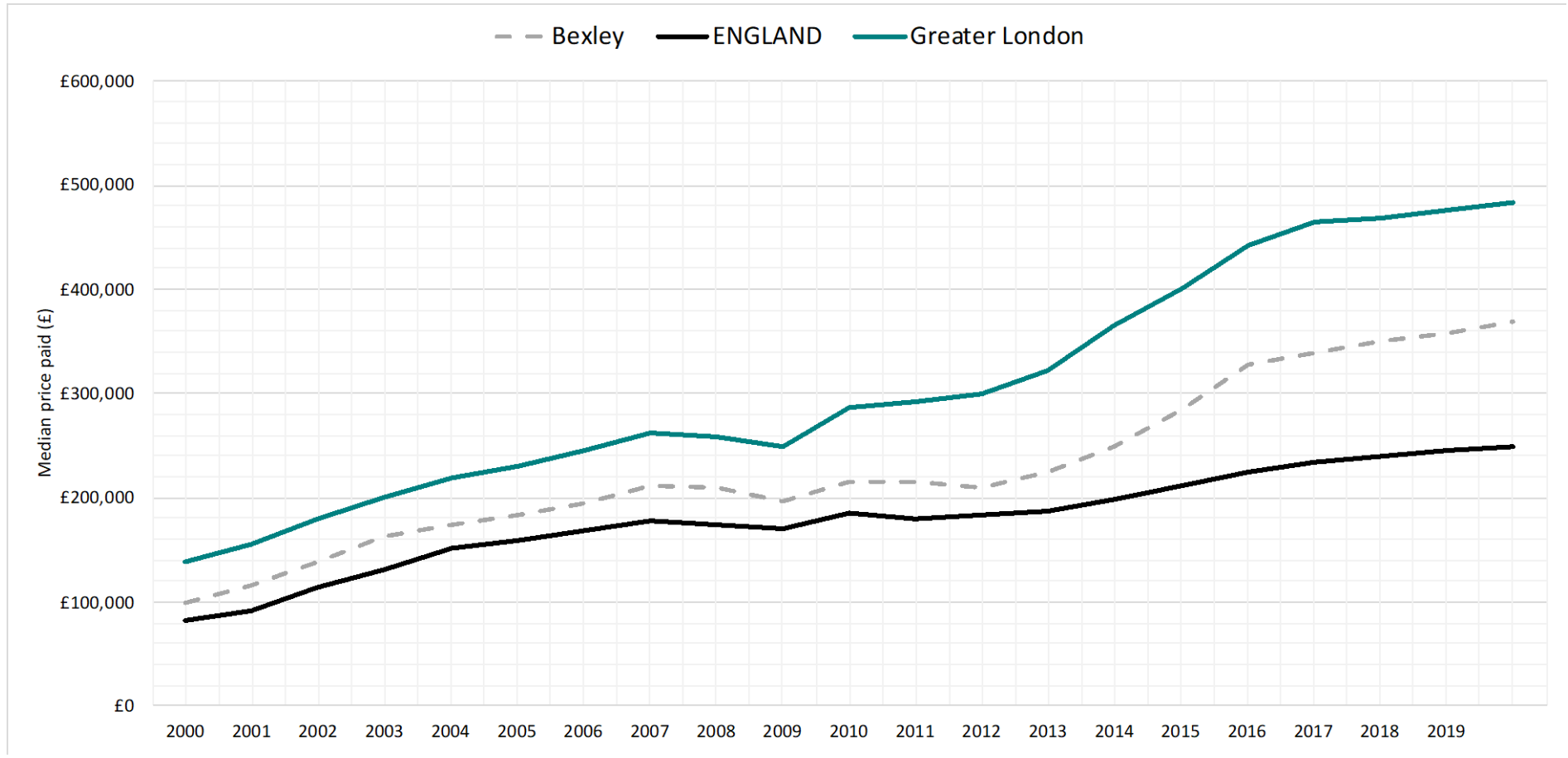
## 2. Understanding housing market dynamics

- 2.1 The purpose of this chapter is to assess the geographical context of the housing market in the Borough of Bexley and its inter-relationships with other areas. By reviewing house prices, migration and travel to work patterns, a picture of the dynamics of housing market emerges.
- 2.2 This chapter considers house price trends, relative affordability, household migration, travel-to-work patterns and dwelling completions data for the Borough. Qualitative research has been used to more fully understand other factors that are driving the housing market and how they vary across the Borough. This chapter provides a clear overview of the housing market dynamics of the area, providing the key evidence needed to determine the appropriate approach to assessing housing need.

### House price trends

- 2.3 Figure 2.1 shows how house prices in the Borough area have changed over the period 2000 to 2020, based on full-year Land Registry price paid data. This is compared with London as a whole (all Borough areas) and England.

**Figure 2.1 Median house price trends 2000 to 2020: The Borough of Bexley, London and England**



Source: Data produced by Land Registry © Crown copyright 2018

- 2.4 Median house prices in the Borough of Bexley have been consistently lower than those for the London region, but above those for England as a whole. Median house prices in the Borough of Bexley more than doubled in the period 2000-2007, rising from £98,500 in 2000 to £212,000 in 2007. The next five years saw price stagnation, reflecting regional and national trends, with prices fluctuating between £196,000 and £215,000. However, the rate of growth has accelerated since, with the five-year period 2012-2018 seeing a rise from a median price of £210,000 to £345,000. During 2020 the median price increased to £370,000.
- 2.5 Overall, median prices have increased from £98,500 in 2000 to £370,000 in 2020, an increase of 275.6%. Table 2.1 sets out comparative house price change over this period, which indicates that this rate of growth is very similar to that experienced across the London Boroughs as a whole (+250%) and some of the neighbouring local authority areas such as Havering (+241%) and Dartford (+260%), and higher than the growth experienced across the South England as a whole (204%).

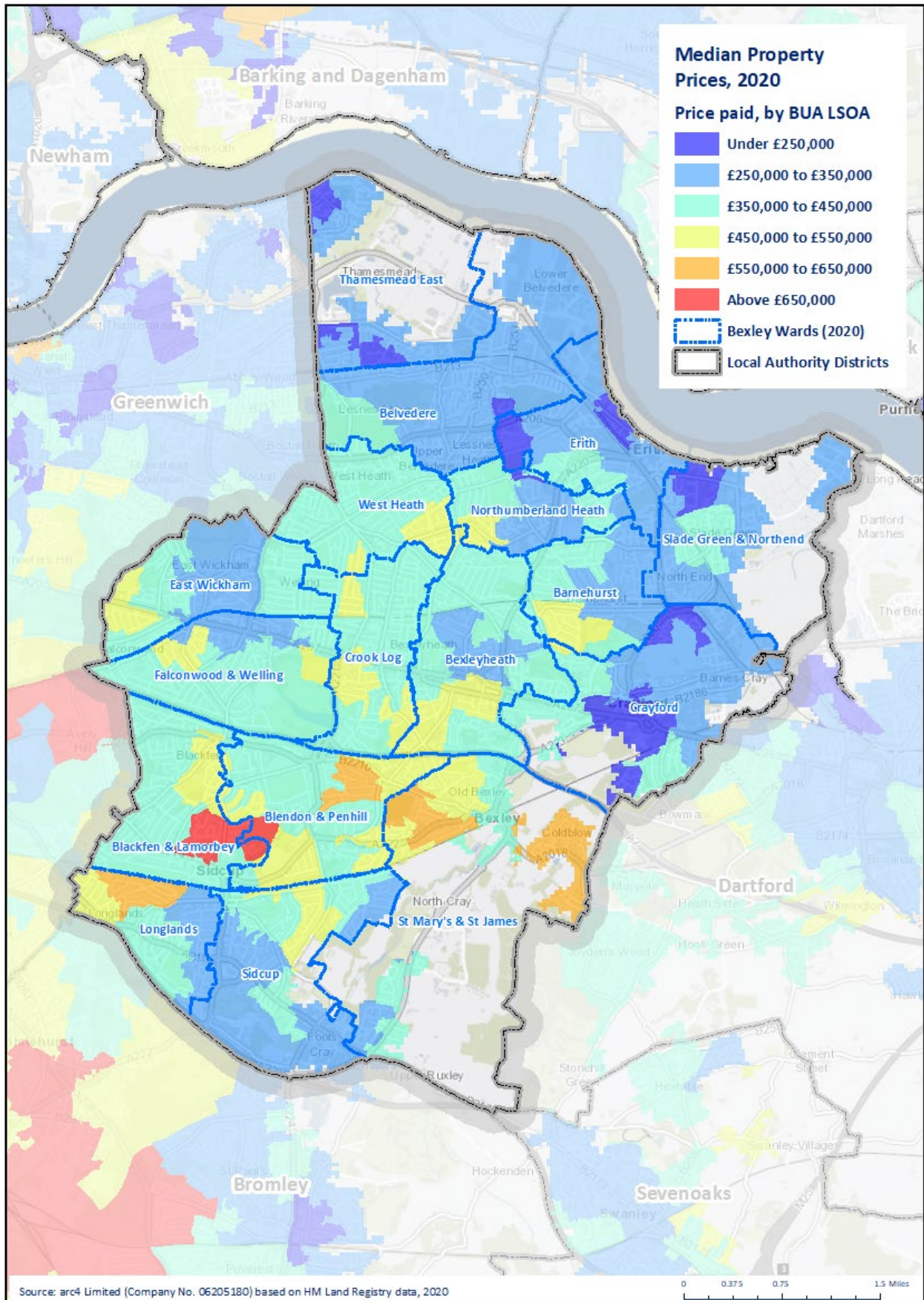
**Table 2.1 Comparative house price change 2000-2019 with neighbouring local authority areas, London, the South East and England**

Location	Median price (£)		% Change 2000-2020
	2000	2020	
Newham	£91,995	£400,000	<b>334.8</b>
Greenwich	£106,500	£440,000	313.1
Barking and Dagenham	£78,000	£320,000	310.3
Thurrock	£75,000	£290,000	286.7
<b>London</b>	<b>£138,000</b>	£483,000	<b>250.0</b>
<b>Bexley</b>	<b>£98,500</b>	<b>£370,000</b>	<b>275.6</b>
Havering	£110,000	£375,000	<b>240.9</b>
Dartford	£89,000	£320,000	259.6
<b>England</b>	<b>£82,000</b>	<b>£249,000</b>	203.7

Source: Data produced by Land Registry © Crown copyright 2018

- 2.6 During 2020, median prices across the Borough of Bexley were £370,000 and lower quartile prices were £280,000. The distribution of median and lower quartile house prices during 2019 is illustrated in Maps 3.1 and 3.2. These indicate relatively higher prices in St Marys and St James Ward in the south of the Borough and Crook Log in the central area. They also show relatively lower prices in the northern wards.

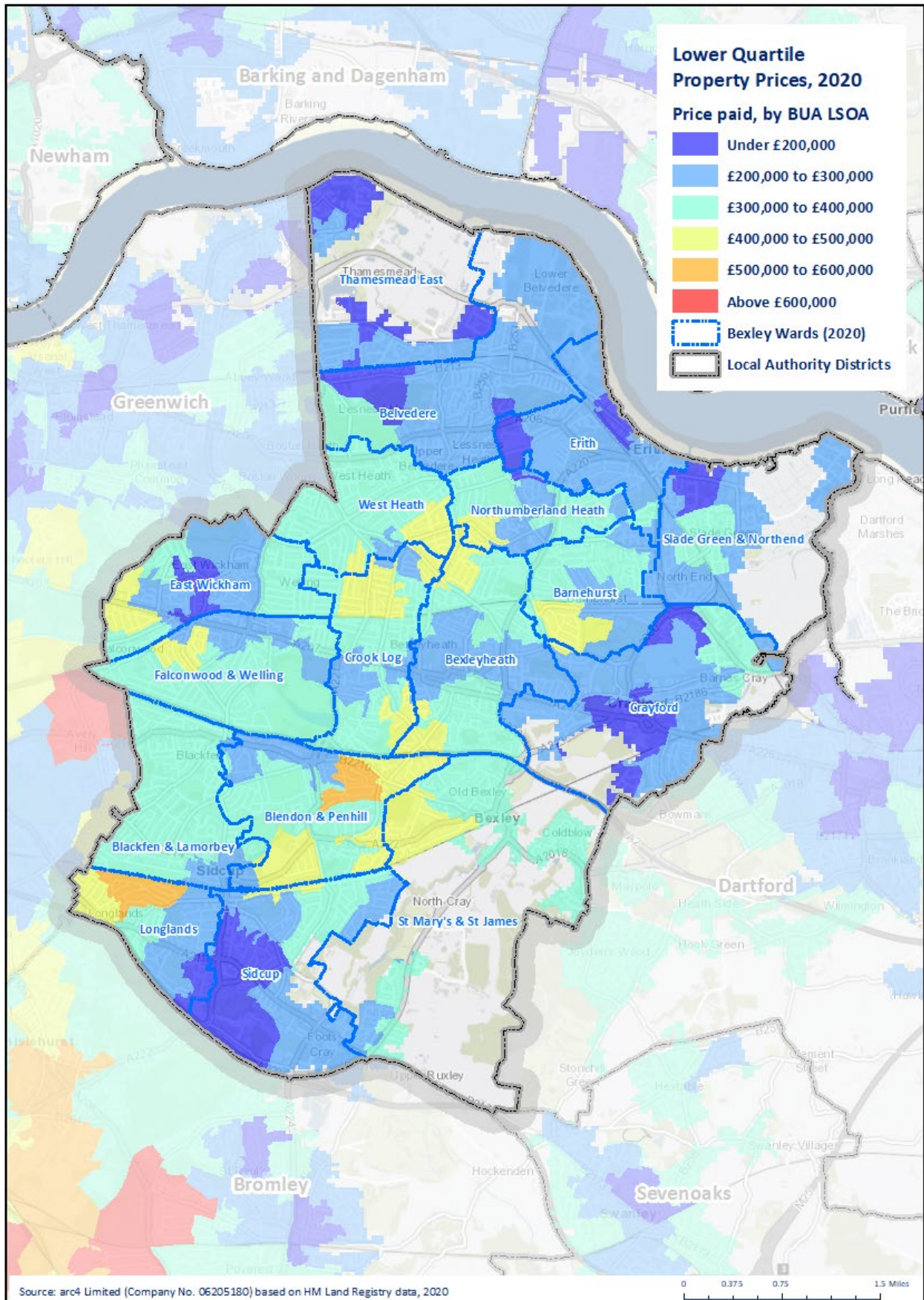
**Map 2.1 Median house prices 2020 by LSOA**



Source: Data produced by Land Registry © Crown copyright 2020



**Map 2.2 Lower quartile house prices 2020 by LSOA**



Source: Data produced by and Registry © Crown copyright 2020

## Relative affordability

- 2.7 The relative affordability of open market dwellings in the Borough of Bexley is compared with the other local authorities in London and the South East in Tables 3.2 and 3.3. These tables are produced by the MHCLG, based on a ratio of earnings to house prices using Land Registry Price Paid and ONS Annual Survey of Hours and Earnings data.
- 2.8 In terms of relative affordability (ranked based on 2019 least-to-most affordable), the Borough of Bexley is the fourth most affordable local authority area of the eight local authority areas listed, with a lower quartile house price to income ratio in 2020 of 10.9, i.e. lower quartile house prices are 10.9x lower quartile gross earnings. Comparing lower quartile house prices with earnings in 2020, Bexley was more affordable than Newham, Greenwich, Sevenoaks, Havering and Barking and Dagenham Boroughs. However, it was less affordable than Dartford and Thurrock. The Borough of Bexley has consistently been more affordable than the London region average (13.2x earnings in 2020), but less affordable than the South East region (10.1x) and England (7.2x).

**Table 2.2 Relative affordability of lower quartile (LQ) prices by local authority area (residence based)**

Area	2017	2018	2019	2020
Newham	15.34	15.67	14.75	13.85
Greater London	13.95	13.72	13.67	13.19
Greenwich	13.53	12.98	13.37	12.16
Sevenoaks	13.33	14.73	11.97	13.47
Havering	12.46	12.23	12.06	11.53
Barking and Dagenham	12.36	12.16	12.31	10.93
<b>Bexley</b>	<b>11.43</b>	<b>11.86</b>	<b>11.49</b>	<b>10.93</b>
Dartford	11.26	10.51	10.07	10.26
South East	10.30	10.51	10.18	10.09
Thurrock	10.19	10.07	10.13	9.36
England	7.26	7.34	7.27	7.15

Sources: ONS Ratio of house price to residence-based earnings

- 2.9 Similarly, in terms of relative affordability based on median prices, Bexley is the fourth most affordable local authority area, with a median income to house price ratio in 2019 of 9.7, as illustrated in Table 2.3. This is again based on Land Registry Price Paid and ONS Annual Survey of Hours and Earnings data.

Area	2017	2018	2019	2020
Newham	13.40	13.28	13.01	12.14
London	13.25	13.09	12.77	12.52
Greenwich	12.67	11.95	12.70	12.00
Sevenoaks	11.56	13.10	10.26	11.76
Havering	10.61	10.54	10.79	10.65
Bexley	10.01	10.04	9.68	9.28
Barking and Dagenham	10.00	10.40	10.76	9.63
South East	9.79	9.92	9.74	9.74
Thurrock	9.26	9.26	9.11	8.72
Dartford	9.32	8.91	9.26	8.40
England	7.92	8.04	7.83	7.84

Sources: ONS Ratio of house price to residence-based earnings

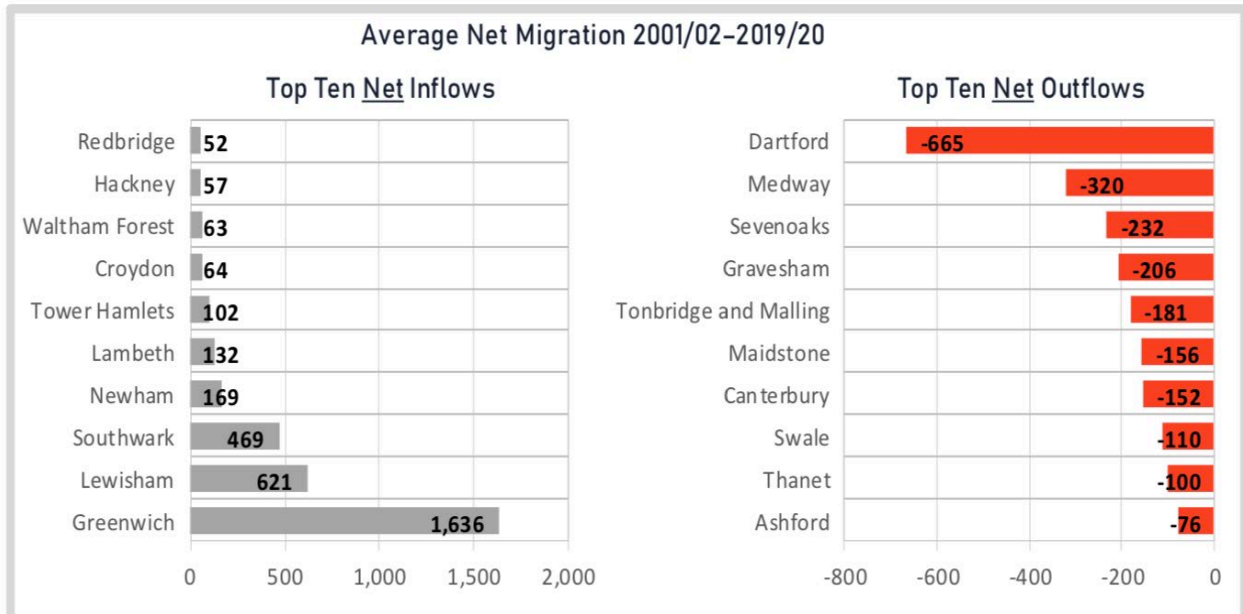
## Household migration

- 2.10 Data reported in the 2011 Census suggests that 62.2% of households who moved in the year preceding the Census originated from within Bexley. Table 2.4 summarises the origins of households based on 2011 Census data. Of the 14,933 households who moved into a new residence in Bexley during the year preceding the Census, 18.8% originated from Greenwich, 5.2% from Dartford, 4.2% from Lewisham, 4.1% from Bromley and 2.1% from Southwark.

Place of Origin	Number	%
Bexley	9,281	62.2
Greenwich	2811	18.8
Dartford	781	5.2
Lewisham	628	4.2
Bromley	615	4.1
Southwark	314	2.1
Sevenoaks	180	1.2
Gravesham	177	1.2
Lambeth	146	1.0
<b>Total</b>	<b>14,933</b>	<b>100.0</b>

Source: 2011 Census

- 2.11 Edge Analytics have provided more up to date migration analysis which shows that over the period 2001/2 to 2019/20, the top inflows have been from Greenwich, Lewisham and Southwark. Top outflows have been to Dartford, Medway, Sevenoaks and Gravesham.

**Figure 2.2 Key migration flows between Bexley and other districts 2001/2 to 2019/20**

Source: Edge Figure 14: Bexley net migration inflows and outflows 2001/2 to 2019/20 (source: ONS)

### Migration trends 2012-2020

- 2.12 Table 2.5 presents a detailed analysis of internal and international migration by year and Table 2.6 summarises the data by broad age and year groups. The base numbers may differ slightly from the ONS components of change analysis due to rounding but provides useful insight into the age group of migrants, their origins and destinations and the relative importance of international migration.
- 2.13 Key trends in migration over the period 2012 to 2020 include:
- consistent inflows from rest of London - mainly Greenwich and Lewisham;
  - consistent outflows to Dartford and the rest of Kent;
  - increasing net outflows to the Rest of England;
  - International net inflows consistent over the 2012-2020 period; and
  - An overall reversal in net population flows from strong net inflows, particularly in the period 2013-16, a net outflow in 2017 and more modest net inflows since 2018.
- 2.14 In terms of migration by age group:
- There has been a substantial and consistent inflow of under 30s and 30-64 age groups from Greenwich and Lewisham.
  - Outflows of under 30s and 30-64 age groups to Kent authorities.
  - International inflows of under 30s has remained a key flow and has been sustained over the period to 2020.
  - Net outflows of 65+ particularly to Kent authorities and the rest of England.

**Table 2.5 National and international migration by year**

YEAR	Bexley	GREATER LONDON REGION							SOUTH EAST REGION						ELSEWHERE UK				TOTAL (UK internal)	International	TOTAL (internal & international)
		Barking and Dagenham	Bromley	Greenwich	Havering	Lewisham	Newham	Rest of LONDON	Thurrock	Rest of Essex	Dartford	Sevenoaks	Rest of Kent	Rest of SOUTH EAST	ENGLAND (rest of)	NORTHERN IRELAND	SCOTLAND	WALES			
2012	Migrated OUT to	64	627	1,895	44	312	66	1,167	67	249	1,445	412	1,627	997	2,177	15	81	115	11,358	429	11,787
	Migrated IN from	82	576	3,439	60	845	260	2,007	38	131	792	163	643	572	1,344	15	70	52	11,090	960	12,050
	NET	17	-51	1,545	17	534	194	840	-29	-118	-653	-248	-984	-424	-833	0	-11	-62	-268	531	263
2013	Migrated OUT to	46	643	1,727	45	273	64	1,102	52	238	1,309	361	1,679	1,013	1,861	14	77	88	10,590	364	10,954
	Migrated IN from	77	622	3,343	44	941	213	2,232	45	182	747	202	729	498	1,401	16	80	64	11,435	970	12,405
	NET	31	-22	1,616	-1	668	150	1,130	-7	-55	-562	-159	-950	-515	-460	2	3	-23	845	606	1,451
2014	Migrated OUT to	46	562	1,612	48	303	77	1,016	55	270	1,388	423	1,703	1,128	2,139	17	80	89	10,955	415	11,370
	Migrated IN from	80	651	3,609	46	921	264	2,475	42	160	805	238	731	557	1,487	21	63	77	12,228	1144	13,372
	NET	35	89	1,998	-3	617	187	1,459	-13	-110	-583	-185	-973	-570	-652	4	-17	-11	1,273	729	2,002
2015	Migrated OUT to	59	625	1,760	63	313	68	1,060	59	232	1,511	463	2,026	1,119	2,340	16	118	111	11,942	430	12,372
	Migrated IN from	130	859	3,413	53	1,091	328	2,534	46	151	765	183	642	587	1,445	18	46	65	12,355	1284	13,639
	NET	71	234	1,653	-10	778	260	1,474	-14	-81	-746	-280	-1,384	-532	-895	2	-72	-46	413	854	1,267
2016	Migrated OUT to	47	663	1,602	59	342	84	1,038	69	209	1,529	440	2,144	1,021	2,298	16	112	94	11,765	523	12,288
	Migrated IN from	144	821	3,411	35	1,020	320	2,854	30	174	739	127	651	560	1,490	15	41	65	12,496	1408	13,904
	NET	97	158	1,809	-25	678	236	1,815	-38	-34	-789	-313	-1,493	-461	-808	-1	-71	-29	731	885	1,616
2017	Migrated OUT to	70	674	1,748	66	335	95	1,384	68	392	1,817	424	2,384	1,166	3,159	36	75	115	14,008	556	14,564
	Migrated IN from	146	723	3,336	66	1,117	358	3,010	77	214	811	176	688	642	1,890	9	60	70	13,393	1159	14,552
	NET	76	50	1,588	-1	782	263	1,626	8	-178	-1,006	-248	-1,696	-524	-1,268	-27	-15	-45	-615	603	-12
2018	Migrated OUT to	71	640	1,918	67	365	121	1,397	105	361	1,795	486	2,415	1,228	3,132	23	100	163	14,387	439	14,826
	Migrated IN from	137	820	3,555	60	1,104	352	2,947	71	216	776	199	685	698	1,909	22	55	85	13,688	1273	14,961
	NET	66	181	1,637	-6	738	231	1,550	-34	-145	-1,019	-287	-1,730	-530	-1,223	-1	-46	-79	-699	834	135
2019	Migrated OUT to	68	669	1,993	66	395	104	1,557	91	338	1,906	443	2,534	1,258	3,205	21	116	151	14,916	432	15,348
	Migrated IN from	184	813	3,619	73	1,109	437	2,899	73	245	849	171	796	682	2,135	16	62	83	14,245	1171	15,416
	NET	116	143	1,625	6	714	333	1,342	-18	-93	-1,058	-273	-1,737	-576	-1,070	-5	-53	-68	-671	739	68
2020	Migrated OUT to	65	541	1,651	48	295	100	1,325	63	306	1,299	348	2,089	1,153	2,970	31	84	132	12,500	481	12,981
	Migrated IN from	162	697	3,099	62	935	308	2,556	65	212	710	155	636	600	1,888	10	60	55	12,211	1140	13,351
	NET	97	156	1,448	14	640	208	1,231	2	-93	-589	-193	-1,453	-552	-1,082	-21	-24	-77	-289	659	370

Sources:

**Internal:** ONS detailed estimates of by origin and destination by local authorities age and sex

**International:** ONS Detailed time series 2001 -2020 (Table: MYEB2)

**Table 2.6 Summary of national and international migration by year group and age group**

PERIOD	AGE GROUP	Bexley	GREATER LONDON REGION							SOUTH EAST REGION						ELSEWHERE UK				TOTAL (UK internal)	International	TOTAL (internal & international)
			Barking and Dagenham	Bromley	Greenwich	Havering	Lewisham	Newham	Rest of LONDON	Thurrock	Rest of Essex	Dartford	Sevenoaks	Rest of Kent	Rest of SOUTH EAST	ENGLAND (rest of)	NORTHERN IRELAND	SCOTLAND	WALES			
2012-2014	<30	Migrated OUT to	90	781	2,712	59	455	129	1,885	86	337	2,043	470	2,243	1,796	3,723	17	116	173	17,116	641	17,757
		Migrated IN from	120	795	5,481	61	1,222	392	3,204	62	232	1,231	270	1,257	1,153	2,782	24	125	142	18,554	1,819	20,373
		NET	30	13	2,769	2	767	263	1,319	-24	-105	-812	-200	-986	-642	-941	7	9	-30	1,438	1,178	2,616
	30-64	Migrated OUT to	63	905	2,197	72	410	75	1,292	81	348	1,833	579	2,158	1,038	1,963	26	103	94	13,235	542	13,777
		Migrated IN from	112	828	4,443	88	1,318	333	3,193	63	191	1,008	254	692	406	1,241	25	80	41	14,314	1,131	15,445
		NET	49	-77	2,246	16	909	258	1,901	-18	-157	-826	-325	-1,466	-632	-721	-1	-23	-53	1,079	589	1,668
	65+	Migrated OUT to	7	41	107	2	12	4	440	8	68	120	89	755	362	492	3	18	24	2,551	25	2,576
		Migrated IN from	5	81	170	2	57	14	850	0	50	106	80	153	69	216	6	6	8	1,872	124	1,996
		NET	-3	40	63	0	44	11	411	-8	-19	-14	-9	-601	-294	-276	3	-12	-16	-679	99	-580
2015-2017	<30	Migrated OUT to	110	875	2,701	102	542	134	2,040	91	374	2,449	561	2,832	1,941	4,666	21	128	183	19,750	865	20,615
		Migrated IN from	216	1,010	5,027	72	1,384	483	3,705	77	279	1,198	234	1,182	1,237	3,268	26	73	141	19,611	2,356	21,967
		NET	106	134	2,326	-30	842	349	1,665	-14	-95	-1,251	-327	-1,650	-705	-1,398	5	-55	-42	-139	1,491	1,352
	30-64	Migrated OUT to	64	919	2,174	79	424	107	1,344	103	391	2,112	613	2,978	1,065	2,591	39	142	107	15,252	598	15,850
		Migrated IN from	198	1,135	4,568	78	1,665	505	4,354	70	234	1,007	206	648	469	1,374	15	62	53	16,638	1,365	18,003
		NET	134	216	2,394	-1	1,241	398	3,010	-32	-158	-1,105	-407	-2,331	-596	-1,217	-24	-80	-54	1,386	767	2,153
	65+	Migrated OUT to	4	5	2	6	2	1	521	3	64	24	62	1,036	371	541	7	35	30	2,713	46	2,759
		Migrated IN from	1	1	4	5	4	13	1,410	6	27	111	45	152	83	195	0	12	7	2,074	130	2,204
		NET	-3	-3	1	-1	1	11	890	2	-37	86	-16	-884	-288	-346	-7	-23	-23	-639	84	-555
2018-2020	<30	Migrated OUT to	127	831	2,896	86	572	175	2,412	128	514	2,384	538	3,040	2,063	5,622	39	144	235	21,806	757	22,563
		Migrated IN from	215	956	4,899	87	1,385	501	3,783	103	389	1,148	207	1,267	1,408	4,179	21	104	140	20,792	2,219	23,011
		NET	88	124	2,003	1	812	326	1,372	-25	-125	-1,235	-331	-1,773	-655	-1,443	-18	-40	-95	-1,014	1,462	448
	30-64	Migrated OUT to	75	883	2,483	93	458	145	1,764	125	428	2,332	617	3,230	1,279	3,096	34	136	180	17,360	570	17,930
		Migrated IN from	260	1,107	4,848	101	1,622	577	4,314	102	262	1,081	251	693	484	1,590	22	69	74	17,456	1,257	18,713
		NET	184	224	2,364	7	1,164	432	2,550	-23	-166	-1,252	-366	-2,537	-794	-1,506	-12	-68	-107	96	687	783
	65+	Migrated OUT to	2	88	117	5	23	6	214	6	61	198	114	843	319	589	1	20	31	2,637	25	2,662
		Migrated IN from	9	190	349	9	91	21	604	4	22	105	67	157	88	162	5	4	9	1,896	108	2,004
		NET	6	101	232	4	69	15	390	-3	-38	-93	-47	-686	-231	-427	4	-16	-22	-741	83	-658

Sources:

**Internal:** ONS detailed estimates of by origin and destination by local authorities age and sex

**International:** ONS Detailed time series 2001 -2020 (Table: MYEB2)

## Household survey household mobility analysis

- 2.15 The 2018 Household Survey identified that around 28.2% of households had moved home in the preceding five years.
- 2.16 Information from the Household Survey relating to households who moved home in the previous five years includes:
- A majority (55.4%) moved from a house, 35.2% from a flat/apartment, 1.7% from a bungalow, 6.0% from a maisonette and 1.8% from another property type;
  - 18.4% moved from a property with one bedroom/bedsit, around 35.2% previously had two bedrooms, 29.8% had three bedrooms, 12.9% from four bedrooms and 3.7% had five or more bedrooms;
  - In terms of tenure, 36.5% of moving households previously lived in an owner-occupied property, 40.5% previously lived in private rented or tied accommodation, around 8.3% had lived in affordable accommodation, 13.1% had been living with family or friends and around 1.7% stated 'other';
  - The three main reasons for moving were wanting larger property or one which was better in some way (22.9%), wanting to buy (18.1%) and forced to move (9.0%).
  - 34.0% said they are planning to move again within the next 5 years, with around 10.1% stating they would like to move but are unable to.
  - Of those planning to move again, over 80% would like to move to a house, with a further 9.5% wanting to move to a flat and around 5% a bungalow.
- 2.17 The 2018 Household Survey found that 21,479 (24.2%) households plan to move in the next five years. A further 7,682 (8.6%) households would like to move but are unable to. Around 68% of these households said that this is because they cannot afford to move.
- 2.18 The Household Survey identified the following characteristics relating to those households planning to move in the next five years:
- In terms of the number of bedrooms, around 39.0% of households would like three or more bedrooms and 38.6% would accept three bedrooms as a minimum in their next property;
  - 45.1% of households would like a detached house although only 15.4% would accept this type of property, and 9.7% would like some form of terraced house but around 20.0% would accept to move into this type;
  - Regarding tenure, households would consider a range of options but 69% stated they were most likely to move into owner occupation, 16.3% affordable rented, 7.6% intermediate tenure and 6.9% private renting.
  - The main reasons why households plan to move are because they want a larger property or one that is better in some way (35.4%), to move to a better neighbourhood/more pleasant area (13.1%) and wanting to buy (10.1%).

- 2.19 Table 2.7 sets out the stated first-choice destination of households planning to move in the next five years. The majority of people (51.1%) want to remain living within the Borough of Bexley. Of those planning to move outside of the Borough, 20.1% of households said they would like to move to Kent, 8.9% elsewhere in London (including Greenwich, Bromley and Southwark) and 18.0% elsewhere and outside the UK.

<b>Destination</b>	<b>% stating as first preference</b>
Within the Borough of Bexley	51.1%
Greenwich	2.8%
Bromley	1.8%
Southwark	0.7%
Elsewhere London	3.6%
Kent	20.1%
Elsewhere South East	2.0%
Elsewhere UK	15.6%
Outside UK	2.4%

Source: 2018 Household Survey

## Travel to work trends

- 2.20 The 2011 Census provides an analysis of travel to work patterns and the extent to which residents in the Borough of Bexley travel to other areas together with details of how many people commute into the area.
- 2.21 The 2011 Census identified the travel to work patterns of 109,939 working individuals who live in the Borough of Bexley.
- 2.22 Looking only at the workplaces that 1,000+ residents travel to from Bexley provides a base of 86,746, of which:
- 34,539 (39.8%) lived and worked in the Borough of Bexley (including those who work at home);
  - 15.0% commuted into the city of London and Westminster; and
  - 12.5% commuted into nearby Greenwich.
- 2.23 In addition, the 2011 Census reports a base of 62,752 individuals who work in the Borough of Bexley. Looking only at local authority areas with 1,000+ residents who travel into Bexley to work provides a base of 55,164 of whom:
- 34,539 people (62.6%) also live in the Borough of Bexley;
  - 5,816 (10.5%) commute into the Borough from Greenwich; and
  - 5,065 (9.2%) commute from Dartford.



## Past trends in housing delivery

- 2.24 Over the past seven years (2012/13 to 2018/19) there has been an average of 506 completions (net) each year across the Borough of Bexley (Table 2.8). This compares with an annualised target over the period of 335 (2012/13 to 2014/15) and a target of 446 (2015/16 to 2018/19). A comparison of annual completions and the annual target is set out in graphical form in Figure 2.3.

Year	Total	Affordable	Market	Policy Target
2012/13	426	30	396	335
2013/14	542	96	446	335
2014/15	807	265	542	335
2015/16	109	-141	250	446
2016/17	816	180	636	446
2017/18	277	0	277	446
2018/19	566	290	276	446
Grand Total (7 years)	3543	720	2823	2789
Annual average (past 7 years)	506	103	403	398

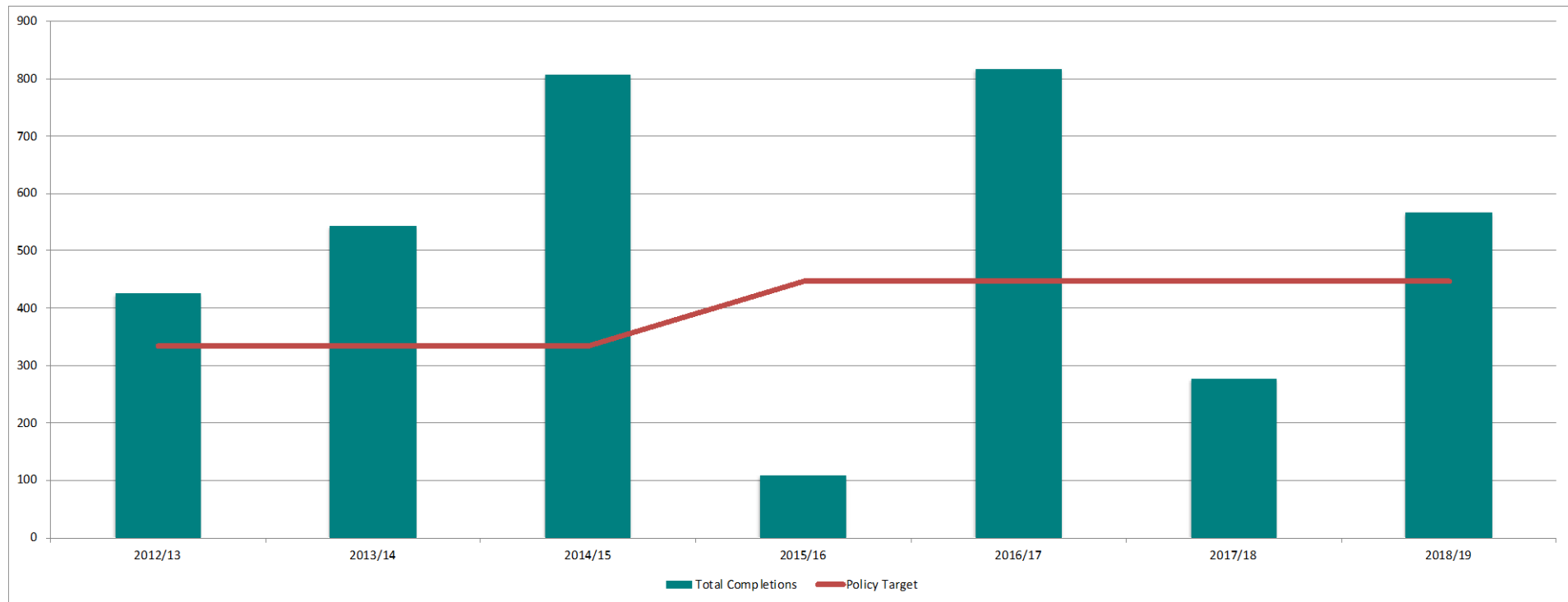
Source: London Development Database; Bexley Annual Monitoring Returns

Notes:

Policy Targets 2003/4 to 2010/11 Policy G6 UDP Adopted 2004; 2011/12 to 2014/15 London Plan target 2011 to 2021; 2015/16 to 2016/17 London Plan 2016

An alternative number of affordable completions 2014/15 is reported in the London Plan AMR (265)

**Figure 2.3 Dwelling completions compared with the annual target**

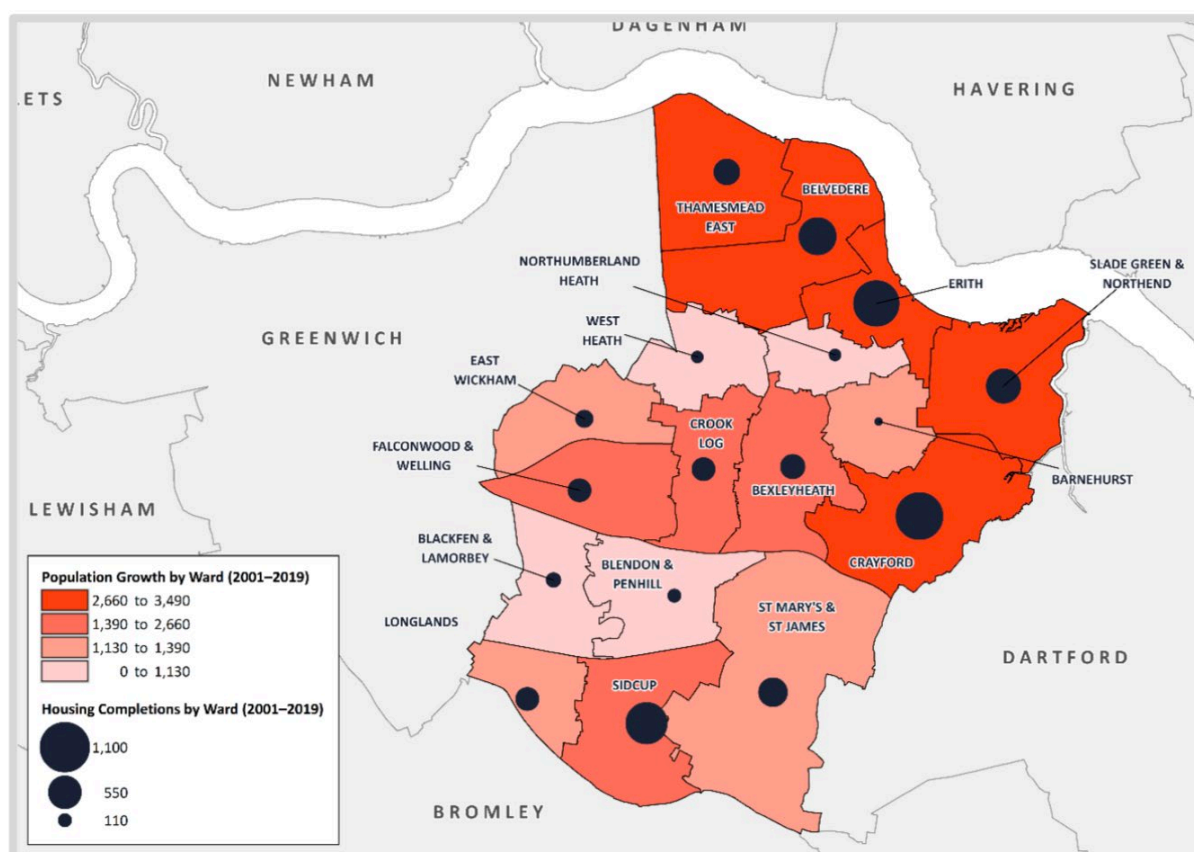


Source: Bexley and London Plan Annual Monitoring Reports

## Impact of newbuild on ward-level population change

- 2.25 Edge Analytics have considered the impact of housing completions on population change over the period 2001/2 to 2018/19 and this is illustrated in Map 2.3. The components of population change by ward are shown in Figure 2.4. The range of population and housing growth has not been uniform. Highest levels of population growth have been in Belvedere, Crayford, Thamesmead East and Erith. Crayford and Erith had had the highest net completions in the Borough. These areas are also identified as ‘Opportunity Areas’ in the Bexley Growth Strategy.
- 2.26 Population growth has been lowest in Blacken & Lamorbey, West Heath and Northumberland Heath but this corresponds with a relatively small net gain in housing completions.

**Map 2.3** Bexley ward-level population change and housing completions 2001 to 2019

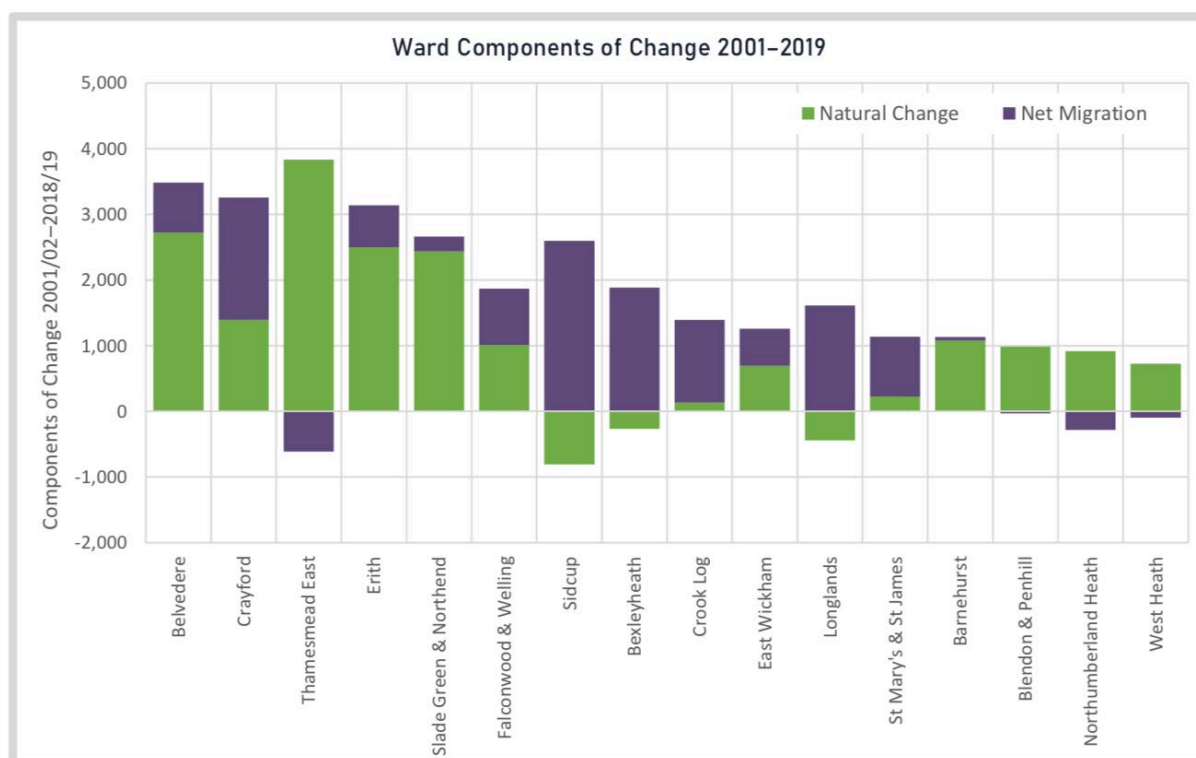


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Source: Edge Analytics Figure 13 (note based on 2011 ward boundaries)

- 2.27 As shown in Figure 2.4, natural change has had a positive contribution to population growth in the majority of wards, with the exception of Sidcup, Longlands and Bexley Heath. In these three wards, net migration has been the key driver of population growth.

**Figure 2.4 Bexley wards - Components of population change 2001/2 to 2018/19**



Source: Edge Analytics Figure 22

### Economic data

2.28 The following data provides a broad overview of the economic landscape of the Borough:

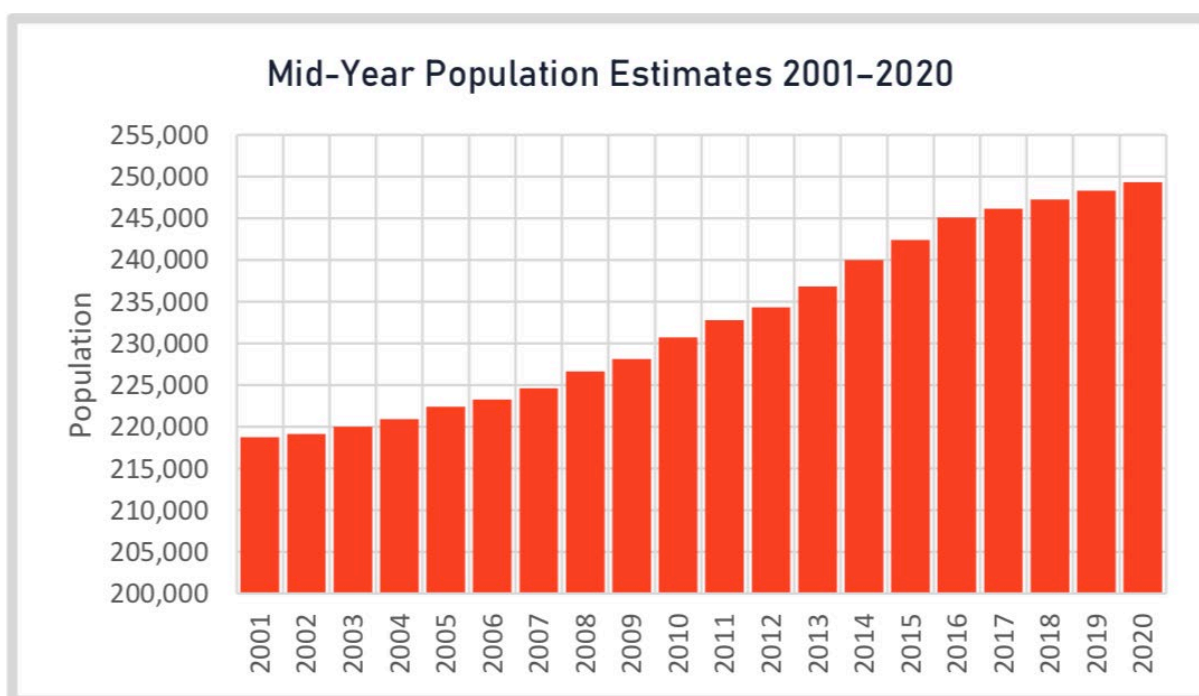
- 66.9% of Household Reference People are economically active and are in employment according to the 2018 Household Survey; a further 21.6% are retired; 4.7% are either looking after the home or provide full-time care; 4.3% are permanently sick/disabled; 2.1% are unemployed and available for work and 0.4% are in full-time education/training;
- According to the 2011 Census, 39.8% of residents in employment work in the Borough of Bexley. However, of the people who work in the Borough, 62.6% also live in the Borough;
- According to the Office for National Statistics (ONS) Annual Survey of Hours and Earnings, lower quartile earnings in 2017 across the Borough of Bexley were £23,614 each year, which compares with £26,000 for the Inner London region and £23,901 for the outer London region. The Lower Quartile earnings for England were £20,667;
- Median incomes in 2017 were £33,353, compared with regional medians of £36,129 and £33,735 for Inner and Outer London respectively and a national median of £29,085; and
- In terms of income, the 2018 Household Survey identified that across the Borough 25.4% of households receive less than £18,200 gross per year, 48.6% receive between £18,201 and £49,400 per year, 21.3% receive

between £49,401 and £101,400 per year and 4.7% receive at least £101,401 per year.

### Historic demographic trends

- 2.29 Figure 2.5 (data presented in Table 2.9) considers how the population of Bexley has changed over the period 2001 to 2020 using official ONS population data. Over this period, the population has increased 11.9% or by around 26,000. As reported by Edge Analytics, the range of population growth has been closely aligned to the national average (11.8%) but lower than the South East London average (17.9%) and Greater London (20%) averages.

**Figure 2.5 Population change in Bexley 2001 to 2020**

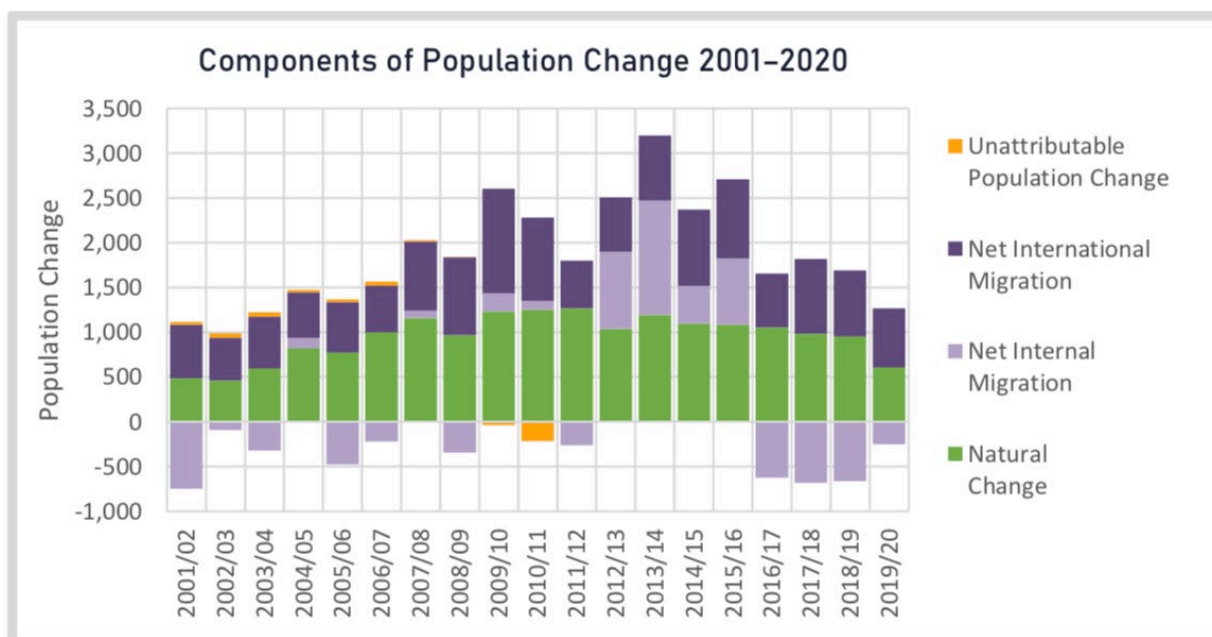


Source: Edge Analytics Report Figure 4 from ONS Mid-year estimates

<b>Table 2.9 Population change in Bexley 2001 to 2019</b>	
Mid 2001	219,123
Mid 2002	220,016
Mid 2003	220,917
Mid 2004	222,391
Mid 2005	223,280
Mid 2006	224,625
Mid 2008	226,652
Mid 2009	228,146
Mid 2010	230,711
Mid 2011	232,774
Mid 2012	234,308
Mid 2013	236,816
Mid 2014	240,016
Mid 2015	242,387
Mid 2016	245,095
Mid 2017	246,124
Mid 2018	247,258
Mid 2019	248,287

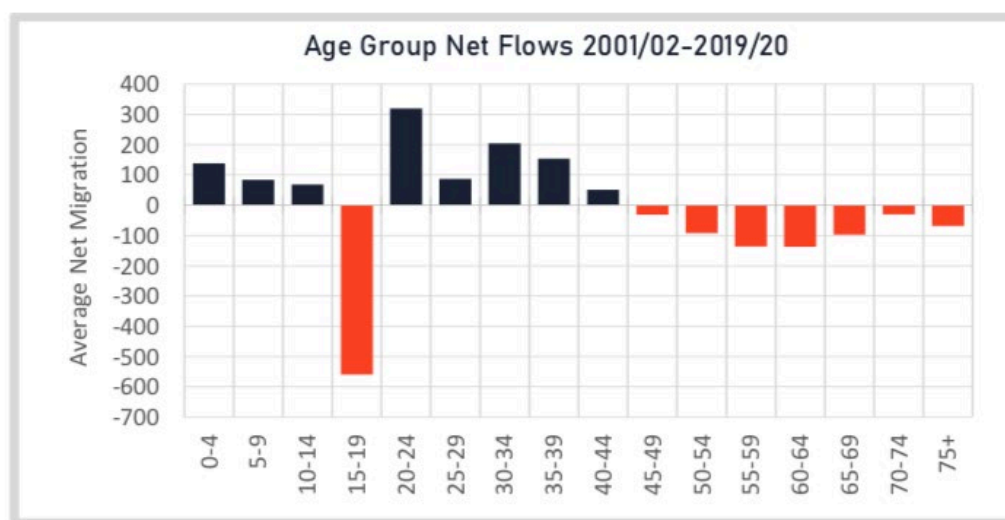
- 2.30 Figure 2.6 considers the components of population change 2001-2020 and shows the relative influence of natural change, net internal migration and net international migration on annual population change. This shows that natural change (births over deaths) has had a consistently positive impact upon annual population growth, averaging +948 each year, although the contribution of natural change has reduced slightly since its peak in 2011/23. International migration has had a similarly positive impact upon population growth, averaging +707 each year. Overall net internal migration has averaged -48 each year but increased to an average of -556 each year the last four years (2016/17 to 2019/20). The age profile of internal migrants is summarised in Figure 2.7.

**Figure 2.6 Components of population change in Bexley 2001 to 2020**



Source Edge Analytics Figure 3 based on ONS data

**Figure 2.7 Bexley internal migration age profile 2001/2 to 2019/20**

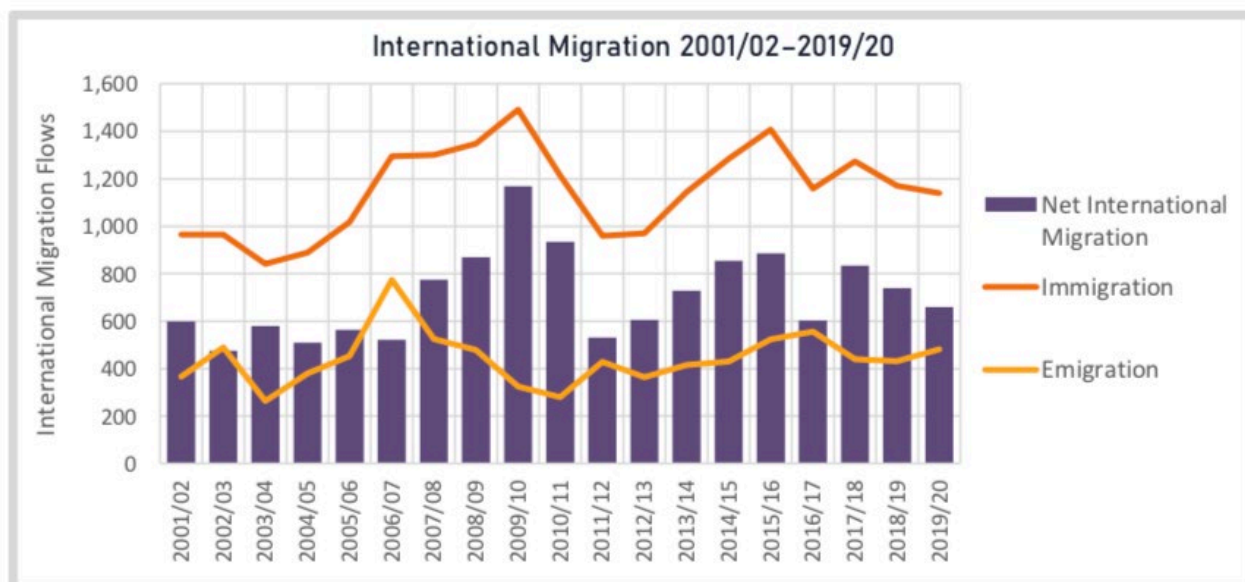


Source : Edge Analytics Figure 15 based on ONS data

- 2.31 The role of international migration has resulted in net population growth each year since 2001. Figure 2.8 considers the level of immigration and emigration over the period 2001/2 to 2019/20 and the net impact on population change.
- 2.32 Edge Analytics reports that for Bexley, immigration and emigration flows have followed a similar trend historically, resulting in a relatively steady net international migration flow. An increase in immigration combined with a fall in emigration between 2007/08 and 2009/10, resulted in a sharp increase in net international migration flows to Bexley, followed by a decrease in the subsequent year as a result of a fall in immigration. Whilst emigration flows remained relatively stable since, immigration flows similarly peaked in 2015/16, decreasing thereafter.

- 2.33 National Insurance Number (NINo) registrations provide an insight into work-based in-migration including migrants whose stay may be shorter than 12 months. Edge Analytics indicates that registrations peaked in 2006 in excess of 500, falling to approximately 250 in 2013 and recovering thereafter. However, 2020 has shown a sharp decline in registrations from all origin groups.

**Figure 2.8 Bexley international migration flows 2001/2 to 2019/20**



Source : Edge Analytics Figure 18 based on ONS data

### A qualitative perspective on housing market dynamics and drivers

- 2.34 Previous sections of this report have focused on describing the policy context and the widely accepted ‘big picture’ quantitative indicators such as price and affordability trends and flows of people. However, the price and rental Maps 2.1 and 2.2 illustrate that housing costs vary considerably across the Borough. An understanding of why price and affordability vary across Bexley is crucial. The following qualitative research is designed to explain this at a local level and add context to the analysis of Bexley’s sub areas in later chapters of the report.

### Key qualitative finding

- 2.35 Interviews with estate agents and observations revealed that:

- The character and price of the local housing supply is closely related to road and rail transport links in the following groupings:
  - Abbey Wood, Belvedere and Erith;
  - Welling and Bexleyheath;
  - Bexley, Crayford and Sidcup;
- Whilst all of these areas have a mixed private sector and public sector housing stock their character is defined by the age and style of large scale period residential development;
- Abbey Wood, Belvedere and Erith to the north of the Borough are typified by older terraced housing reflecting growth as a London residential area later in



the 19<sup>th</sup> Century, however this differs from western Thamesmead which is a 1960's 'new town';

- Welling and Bexleyheath, are largely sub-urban in nature being densely developed and populated to house London's growth across the 20<sup>th</sup> Century;
- Bexley, Crayford and Sidcup have a more diverse role reflecting their origins within the county of Kent;
- Local market suburban housing markets are driven largely by employment within the city of London and more recently the Crossrail development terminating at Abbey Wood station;
- Supply from re-sale and re-let market housing is currently constrained because of uncertainty arising from the Brexit process;
- There were currently low volumes of new build housing on sale though two large sites were under construction. It was evident that local housebuilders were building on small sites and individual plots. We noted several affordable developments under construction.

## Introduction

- 2.36 The following information has been obtained from interviews with estate and letting agents and from our observations when visiting the Borough. Our aim was to get a better understanding of housing market dynamics and the geography of sub-markets. We have reported agent views and perceptions as stated by them.
- 2.37 All re-sale agents stressed that supply was down mostly because of the economic uncertainty associated with Brexit. As a result, houses coming onto the market sold quickly and prices remained strong due to excess demand.
- 2.38 We came across little market new build activity on any scale and we are therefore unable to achieve any information regarding the market for new build housing. Groundwork in 2019 had commenced on a large central site in Bexleyheath, but work was not sufficiently advanced for a sales office to be established. We observed a significant amount of affordable housing under construction. We also observed recently completed construction on a significant scale in all parts of the Borough.

## Thamesmead

- 2.39 The Thamesmead area within Bexley is noted for its bold, medium and high rise architecture, commissioned as a new town in the 1960s and mostly housing social tenants. More recently, the area to the east has been developed as low rise traditional housing with a more diverse mix of tenure. Extensive regeneration is also planned for the area as the area is a Housing Zone in the Growth Strategy.

Agents told us that the whole area is currently of little interest to London city professionals. Instead the area is home to significant communities of Asian and African communities and occupancy is managed by social and private landlords. Rents and prices are generally lower than other parts of the Borough.

## Abbey Wood, Belvedere and Erith

- 2.40 Abbey Wood, Belvedere and Erith to the north of the Borough, are typified by older terraced housing reflecting growth as a London residential area later in the 19<sup>th</sup> Century. They are connected by the northern-most rail route running east to west south of the River Thames.
- 2.41 Agents told us that prices rose quickly once plans were announced to link Abbey Wood to the Crossrail system and demand for housing in this area has been sustained ever since. We were told that dwellings with short leases were becoming a problem as lenders would not lend on short lease property. Agents said that the local gap is 3-bedroom housing that are affordable to local growing families and Erith is a popular choice for these households as other areas of Bexley are more expensive. The area generally houses large proportions of incomers – up to 50% of sales and rentals, from elsewhere in London. The rental gap is two-bedroom terraced homes due to excessive demand from tenants of flats who find them unsuitable for children.
- 2.42 Agents in each town told us that prices were lower than the suburban areas of Bexleyheath and Welling. At Erith new build affordable housing and apartments were apparent on a significant scale.

## Welling and Bexleyheath

- 2.43 Welling and Bexleyheath, are largely suburban in nature being densely developed and populated to house London's growth across the 20<sup>th</sup> Century. They are connected by the A207 and a railway line that connects to London Bridge via Eltham and Lewisham.
- 2.44 The major house type across both areas are semi-detached and detached family homes. These were mostly developed in the 20<sup>th</sup> century inter-war years. Welling and Bexleyheath have significant retail, leisure and commercial services, however the greater part of the area is formed of a series of housing developments with small local service centres – small shopping parades and convenience stores. Agents had an impressive knowledge of the characteristics of individual housing developments, many being able to name the 1930's developer and how the house types differed between developments. A key distinguishing characteristic affecting house price is whether the gap between homes is sufficient to allow extensions to the home whilst retaining car parking space. Agents explained that market demand was driven by London families wishing to live in a suburban rather than an urban environment and it was important that they could accommodate growing families. They would also seek to customise the appearance of their homes. 2-bedroom homes are in short supply to provide less expensive accommodation to new households than the 3-bedroom type that forms the predominant supply. Detached homes are sought after and attract a premium price.
- 2.45 The area remains attractive to east London and inner London based households who take around 40% of both resale and rental vacancies. We were told that interest from investors remains strong when a house is for sale needing renovation. These vacancies tend to arise from older people as they pass away or relocate to the coast.

## Bexley, Crayford and Sidcup

- 2.46 Bexley, Crayford and Sidcup have a more diverse role reflecting their origins within the county of Kent. They are older towns that were not developed primarily as suburban development. It is clear that there has been recent and current investment in retail parks and other facilities. They are connected by the southern-most east-west rail connection to London Bridge within the Borough.
- 2.47 Sidcup is the most southernly town to the south of the Borough. Its character differs from the suburban core of the Borough with a more diverse housing stock. Agents showed us examples of premium detached homes with grounds not found in other parts of the Borough. We were told that the rail journey to central London took 40 minutes and the town would attract incomers due to more affordable prices and a good quality of life that compensated for the longer travel time, which included the catchment area of a grammar school. Resale agents highlighted the quality of local primary schools as being a key factor attracting people to the area with younger families and retaining them. We were told it was difficult for first-time buyers to access the market as entry level prices were around £350,000, although in reality many first-time buyers received parental help with deposits.
- 2.48 There was a gap in the market for 3-bedroom semi-detached houses at up to the £450,000 price point. These were sought after by first-time movers with growing families from both local households and incomers to the area. We were told that households would often extend 3-bedroom homes where 4 and 5-bedroom homes could not be afforded. This affected supply of 3-bedroom homes as they were either being converted, or households were reluctant to move from them.
- 2.49 Agents stated that older people tended to stay put further restricting supply of family housing. We were told that some would re-locate to areas of the south coast which were affordable to them, but this was for a minority of residents.
- 2.50 Most lettings occurred to local households. Rental specialists also highlighted a gap of 3-bedroom homes especially those with off-street parking. Investors tended to have more 1 and 2-bedroom homes in their portfolio due to a more favourable return on investment. We were told that the overall level of demand for rented housing was growing and rents were rising as a consequence. Agents told us that lettings to households in receipt of housing benefit were rare. We were told that there had been a drop in investor activity and as a consequence more property was being acquired by first-time buyers.

## Stakeholder views on market drivers

- 2.51 Stakeholders responding to the online survey were asked to identify what they perceive to be the main drivers of housing demand in Bexley. Drivers identified included:
- Relative affordability, with Bexley being considered good value for money compared with other London Boroughs;
  - Transport links and accessibility, with quick travel into London;

- Population growth, with growing demand; and
- A historic shortfall in housebuilding.

## Concluding comments

- 2.52 The purpose of this chapter has been to consider the general housing market context of the Borough of Bexley and its inter-relationships with other areas. By reviewing house prices, relative affordability, migration, travel to work patterns and dwelling completions, a picture of the market dynamics of the Borough emerges.
- 2.53 House prices in Bexley remain lower than those for London as a whole. In 2020, the median house price in Bexley was lower than that for the London Boroughs of Greenwich and Havering and the district of Sevenoaks (Kent); however, it was higher than the median price in Barking and Dagenham, Dartford and Thurrock. Relative affordability, taking account of average earnings, shows a similar trend. Bexley is more affordable than the London-wide average and all of the local London Boroughs except for Barking and Dagenham. However, it is less affordable than Thurrock, Dartford and the South East region.
- 2.54 2011 Census migration data indicates a significant number of local moves. Likewise, the 2018 Household Survey found that of those households planning to move in the next five years, around one-half (51.1%) want to remain living within the Borough of Bexley.
- 2.55 In terms of travel-to-work patterns, the 2011 Census indicates that 39.8% of those residents of the Borough who are employed work within the Borough area, including working from home. Around 60% of the employed population commute out of the Borough to their place of work. By contrast, of the individuals who work in the Borough, 62.6% also live within Bexley. Out-commuting is therefore considerably higher than in-commuting.
- 2.56 A qualitative assessment of the overall housing market breaks the Borough down into four distinctive constituent areas: Thamesmead; Abbey Wood, Belvedere and Erith; Bexleyheath and Welling; and Bexley, Crayford and Sidcup.

### 3. Housing stock review

- 3.1 The purpose of this chapter is to explore the characteristics of the Borough of Bexley and its housing stock, focusing on the current stock profile, condition and tenure characteristics. This includes a detailed analysis of the major tenures: owner occupation, the private rented sector and affordable accommodation.

#### Estimates of current dwellings in terms of size, type, condition, tenure

- 3.2 The most recent data available from various sources relating to dwelling stock and households is reported in Table 3.1.

<b>Table 3.1 Dwelling stock and household estimates</b>		
<b>Data source</b>	<b>Total Dwellings</b>	<b>Source</b>
2017 Valuation Office Agency	97,850	VOA Table CTSOP1.0
2018 Valuation Office Agency	98,510	VOA Table CTSOP1.0
2019 Valuation Office Agency	98,810	VOA Table CTSOP1.0
2020 Valuation Office Agency	96,350	VOA Table CTSOP1.0
2017 MHCLG Dwelling Stock Estimates	97,630	MHCLG Live Tables on Dwelling Stock Table 100
2018 MHCLG Dwelling Stock Estimates	97,910	MHCLG Live Tables on Dwelling Stock Table 100
2019 MHCLG Dwelling Stock Estimates	98,391	MHCLG Live Tables on Dwelling Stock Table 100
2020 MHCLG Dwelling Stock Estimates	98,599	MHCLG Live Tables on Dwelling Stock Table 100
2018 Council Tax	98,007	Council
<b>Data source</b>	<b>Total Households</b>	<b>Source</b>
2018 Council Tax (est.)	97,764	Council
2014-based DCLG Household Projections 2018 figure	100,338	MHCLG
2016-based DCLG Household Projections 2018 figure	98,701	MHCLG
2016-based GLA Household Projections 2018 figure (Central Scenario)	100,038	GLA
GLA 2016-based Housing-Linked	98,911	GLA
20180based ONS household projections 2021 figure	99,924	ONS

- 3.3 Council Tax data 2018 reports a total of 98,007 dwellings and 97,764 households across the Borough and this latter figure is taken as the total number of households for the purposes of the Household Survey analysis. This may be a slight underestimate in the number of households based on other sources, but the principle of survey analysis is to consider patterns and processes in household dynamics and their relationship with the housing market in general. This assumption is therefore reasonable and proportionate.

- 3.4 Baseline dwelling and household statistics for each of the wards is set out in Table 3.2.
- 3.5 The latest 2020 MHCLG dwelling stock figure is 98,599.

<b>Ward</b>	<b>Total Dwellings</b>	<b>Total Households</b>
Barnehurst Ward	4,576	4,569
Belvedere Ward	7,165	7,001
Bexleyheath Ward	6,227	6,546
Blackfen & Lamorbey Ward	6,419	6,449
Blendon & Penhill Ward	6,169	6,193
Crayford Ward	6,748	6,662
Crook Log Ward	6,335	6,363
East Wickham Ward	6,188	6,148
Erith Ward	4,507	4,505
Falconwood & Welling Ward	6,240	6,507
Longlands Ward	4,303	4,310
Northumberland Heath Ward	4,476	4,187
Sidcup Ward	6,785	6,863
Slade Green & Northend Ward	5,093	4,866
St Mary's & St James Ward	4,552	4,545
Thamesmead East Ward	6,162	6,003
West Heath Ward	6,061	6,047
<b>Total</b>	<b>98,006</b>	<b>97,764</b>

Source: 2018 Council Tax

- 3.6 According to 2020 MHCLG dwelling stock statistics, there were 1,445 vacant dwellings (representing 1.5% of the total dwelling stock of 98,599) and 505 long-term vacant (0.5% of dwelling stock) across the Borough. This compares with national rates of 2.7% (all vacants) and 1.0% (long-term vacants) in 2020. The vacancy rate in the Borough is below the 'transactional vacancy level' of 3%, which represents the proportion of stock which would normally be expected to be vacant to allow movement within the market. This is a reflection of the high demand for accommodation in the Borough.

### Property size and type

- 3.7 Based on the 2018 Household Survey, the vast majority (70.3%) of occupied properties are houses (of which 5.8% are detached, 41.9% are semi-detached and 22.5% are terraced/town houses), 18.6% are flats/apartments, 5.7% are maisonettes, 4.9% are bungalows and 0.5% are other types of property including park homes/caravans.
- 3.8 Of all occupied properties, 11.2% have one bedroom/bedsit/studio, 24.9% have two bedrooms, 44.0% have three bedrooms, 16.4% have four bedrooms and 3.5% have five or more bedrooms.
- 3.9 Table 3.3 shows property type and size information for the Borough as a whole, based on the findings of the Household Survey.

<b>Table 3.3 Property type and size of occupied dwellings across the Borough of Bexley</b>						
<b>Property Type</b>	<b>No. Bedrooms (Table %)</b>					<b>Total</b>
	<b>One/ bedsit</b>	<b>Two</b>	<b>Three</b>	<b>Four</b>	<b>Five or more</b>	
Detached house	0.0%	0.3%	1.8%	2.5%	1.1%	5.8%
Semi-detached house	0.2%	3.4%	25.0%	11.1%	2.1%	41.9%
Terraced house / town house	0.3%	5.7%	14.2%	2.3%	0.2%	22.5%
Bungalow	0.4%	2.7%	1.5%	0.2%	0.1%	4.9%
Maisonette	0.6%	4.3%	0.6%	0.1%	0.0%	5.7%
Flat / apartment	9.3%	8.4%	0.7%	0.2%	0.0%	18.6%
Other	0.4%	0.1%	0.1%	0.0%	0.0%	0.5%
<b>Total</b>	<b>11.2%</b>	<b>24.9%</b>	<b>44.0%</b>	<b>16.4%</b>	<b>3.5%</b>	<b>100.0%</b>
<i>Base (Valid response)</i>	<i>10,764</i>	<i>24,125</i>	<i>42,509</i>	<i>15,899</i>	<i>3,400</i>	<i>96,697</i>

Source: 2018 Household Survey

3.10 Table 3.4 compares the occupied dwelling stock profile with the 2017 Valuation Office Agency data. The main variation is higher proportions of households living in four bedroom dwellings were represented in the Household Survey and fewer households living in three bedroom dwellings.

<b>Dwelling type/size</b>	<b>2017 VOA</b>	<b>2018 Survey</b>
1/2 Bed House	12.0	10.0
3 Bed House	47.0	41.3
4 Bed House	10.4	19.4
1 Bed Flat	9.6	9.9
2 Bed Flat	13.3	12.8
3+ Bed Flat	1.8	1.7
1 Bed Bungalow	0.4	0.4
2 Bed Bungalow	3.5	2.7
3+ Bed Bungalow	2.1	1.8
Total	100.0	100.0
Base	97150	96179

Source: 2018 Household Survey; 2017 VOA

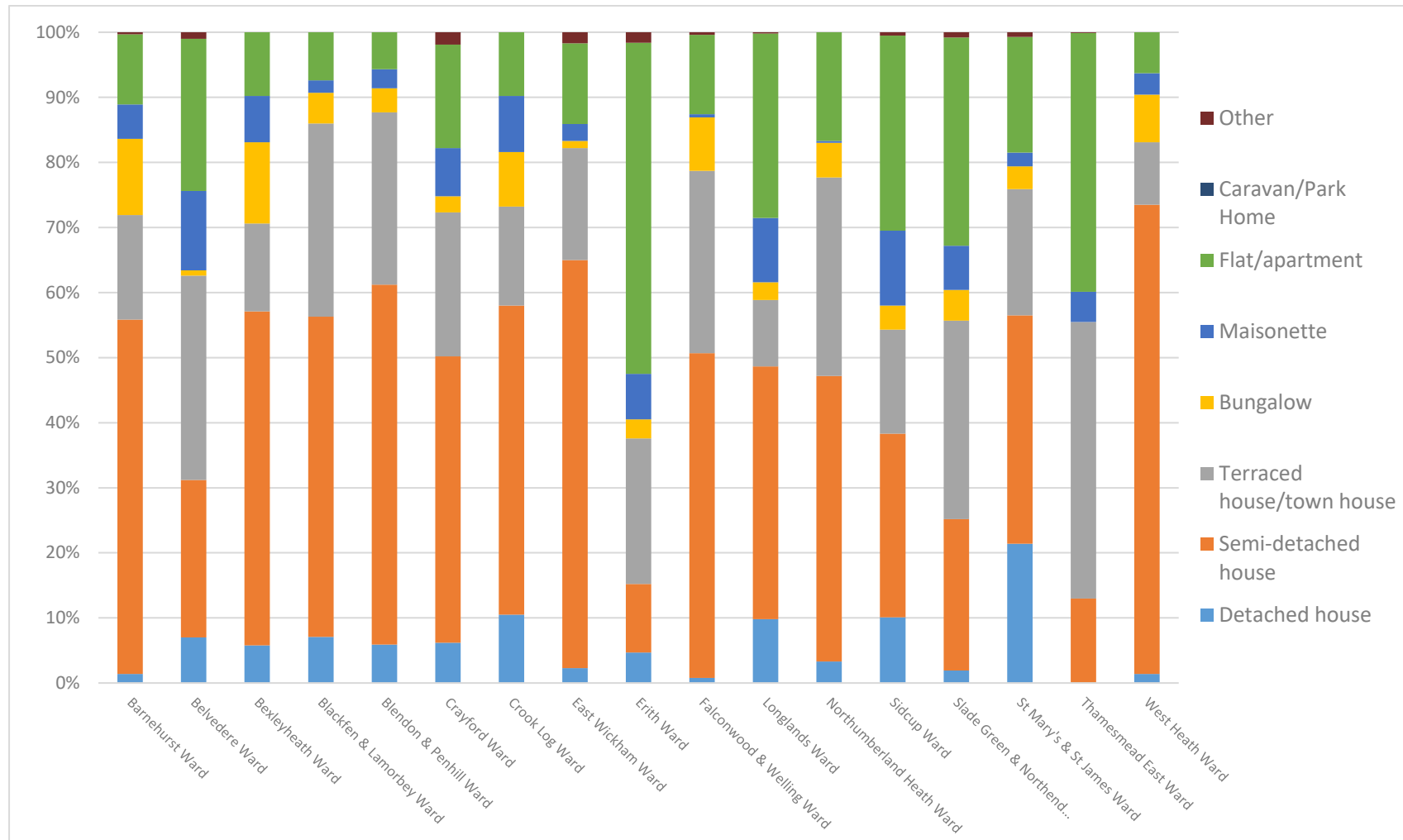
- 3.11 How property type varies by the ward areas is set out in Table 3.5 and Figure 3.1 and 3.2 using 2018 Household Survey evidence. Wards with significantly above-average concentrations of particular property types are highlighted in Table 3.5. Across the whole Borough area, 41.6% of dwelling stock is semi-detached; this rises to 72.1% of stock in West Heath Ward. A further 22.4% of the housing in Bexley is terraced or town houses, but in Thamesmead East this figure is 42.5%. While only 5.8% of the Borough stock is detached housing, the St Marys & St James Ward has 21.4% detached dwellings. Flats/apartments account for 18.5% of dwellings across the Borough of Bexley, with a high of 50.9% in Erith ward. By comparison, 5.6% of Borough stock is maisonettes and 4.9% is bungalow dwellings.
- 3.12 Figure 3.2 shows variations in number of bedrooms across the ward areas and Bexley as a whole (final bar). This shows a high proportion of larger properties with four or more bedrooms in Blendon & Penhill (34.1%) and St Marys & St James (33.0%) Wards. A high proportion of smaller (one and two bedroom) properties are seen in Erith (65.9%) and Belvedere (50.8%) Wards. The highest proportions of three-bedroom dwellings are found in West Heath (61.3%) and Crayford (55.2%) Wards.



Ward	Detached house	Semi-detached house	Terraced/ town house	Bungalow	Maisonette	Flat/ Apartment	Other	Base
Barnehurst Ward	1.4%	54.5%	16.1%	11.7%	5.3%	10.8%	0.3%	4,532
Belvedere Ward	7.0%	24.2%	31.4%	0.8%	12.2%	23.4%	1.0%	7,001
Bexleyheath Ward	5.8%	51.3%	13.5%	12.5%	7.1%	9.8%	0.0%	6,546
Blackfen & Lamorbey Ward	7.1%	49.2%	29.7%	4.7%	1.9%	7.4%	0.0%	6,418
Blendon & Penhill Ward	5.9%	55.3%	26.5%	3.7%	2.9%	5.7%	0.0%	6,193
Crayford Ward	6.2%	44.0%	22.1%	2.5%	7.4%	15.9%	1.9%	6,545
Crook Log Ward	10.5%	47.5%	15.2%	8.4%	8.6%	9.8%	0.0%	6,363
East Wickham Ward	2.3%	62.7%	17.2%	1.1%	2.6%	12.4%	1.7%	5,992
Erith Ward	4.7%	10.5%	22.4%	2.9%	7.0%	50.9%	1.6%	4,380
Falconwood & Welling Ward	0.8%	49.9%	28.0%	8.2%	0.5%	12.2%	0.4%	6,507
Longlands Ward	9.8%	38.8%	10.2%	2.7%	9.9%	28.3%	0.2%	4,260
Northumberland Heath Ward	3.3%	43.9%	30.5%	5.3%	0.3%	16.7%	0.0%	4,131
Sidcup Ward	10.1%	28.2%	16.0%	3.7%	11.5%	30.0%	0.5%	6,800
Slade Green & Northend Ward	1.9%	23.3%	30.5%	4.7%	6.8%	32.0%	0.8%	4,803
St Mary's & St James Ward	21.4%	35.1%	19.4%	3.5%	2.1%	17.8%	0.7%	4,535
Thamesmead East Ward	0.0%	13.0%	42.5%	0.0%	4.6%	39.8%	0.1%	6,003
West Heath Ward	1.4%	72.1%	9.6%	7.3%	3.3%	6.3%	0.0%	6,047
<b>Bexley Total</b>	<b>5.8%</b>	<b>41.6%</b>	<b>22.4%</b>	<b>4.9%</b>	<b>5.6%</b>	<b>18.5%</b>	<b>0.5%</b>	<b>97,055</b>

Source: 2018 Household Survey

**Figure 3.1 Property type by ward**

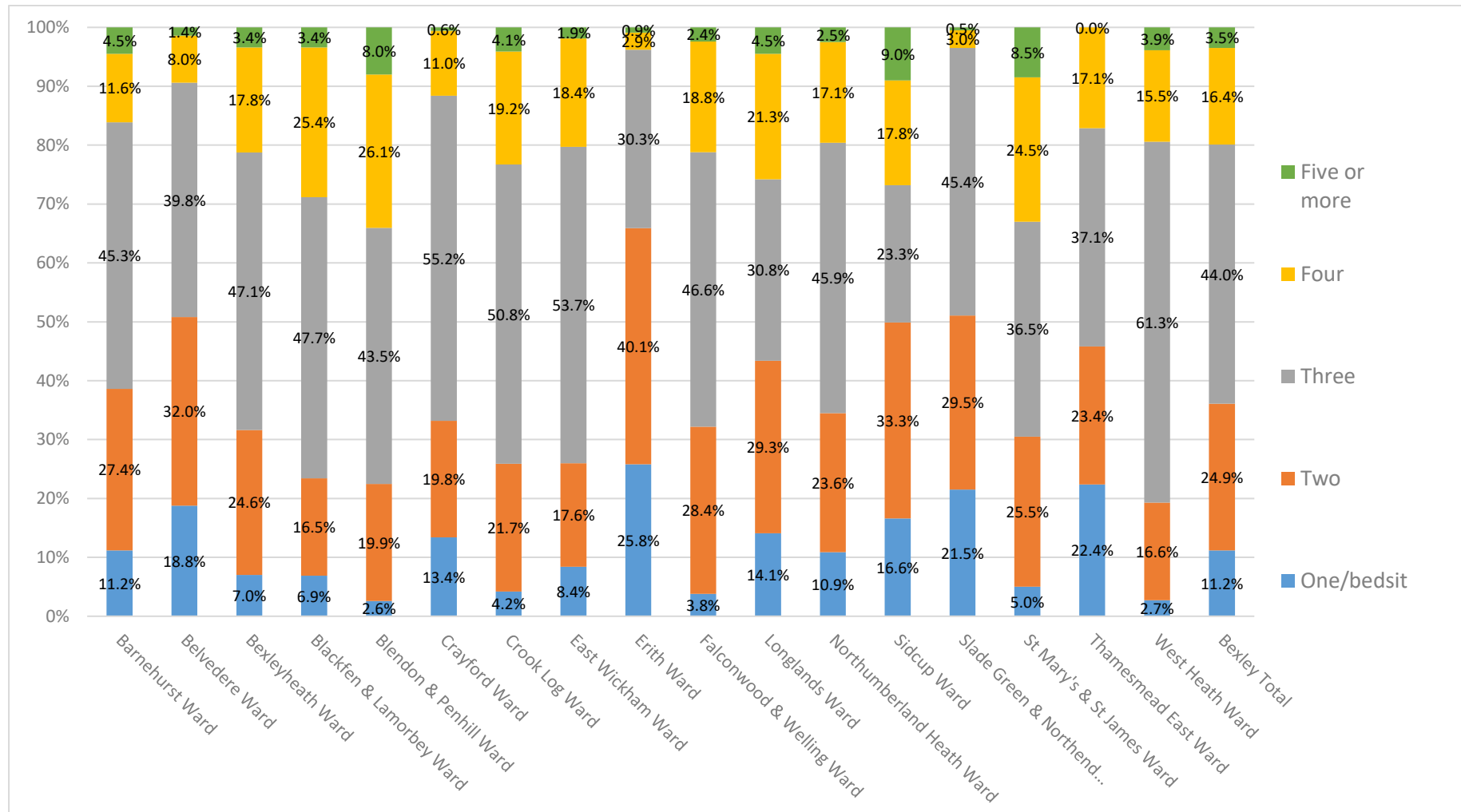


Source: 2018 Household Survey

<b>Ward</b>	<b>1-bedroom/ bedsit</b>	<b>2-bedroom</b>	<b>3-bedroom</b>	<b>4-bedroom</b>	<b>5-bedroom or more</b>	<b>Base</b>
Barnehurst Ward	11.2%	27.4%	45.3%	11.6%	4.5%	4,532
Belvedere Ward	18.8%	32.0%	39.8%	8.0%	1.4%	7,001
Bexleyheath Ward	7.0%	24.6%	47.1%	17.8%	3.4%	6,546
Blackfen & Lamorbey Ward	6.9%	16.5%	47.7%	25.4%	3.4%	6,418
Blendon & Penhill Ward	2.6%	19.9%	43.5%	26.1%	8.0%	6,193
Crayford Ward	13.4%	19.8%	55.2%	11.0%	0.6%	6,545
<b>Crook Log Ward</b>	<b>4.2%</b>	<b>21.7%</b>	<b>50.8%</b>	<b>19.2%</b>	<b>4.1%</b>	<b>6,363</b>
East Wickham Ward	8.4%	17.6%	53.7%	18.4%	1.9%	5,992
Erith Ward	25.8%	40.1%	30.3%	2.9%	0.9%	4,380
Falconwood & Welling Ward	3.8%	28.4%	46.6%	18.8%	2.4%	6,507
Longlands Ward	14.1%	29.3%	30.8%	21.3%	4.5%	4,260
Northumberland Heath Ward	10.9%	23.6%	45.9%	17.1%	2.5%	4,131
Sidcup Ward	16.6%	33.3%	23.3%	17.8%	9.0%	6,800
Slade Green & Northend Ward	21.5%	29.5%	45.4%	3.0%	0.5%	4,803
St Mary's & St James Ward	5.0%	25.5%	36.5%	24.5%	8.5%	4,535
Thamesmead East Ward	22.4%	23.4%	37.1%	17.1%	0.0%	6,003
West Heath Ward	2.7%	16.6%	61.3%	15.5%	3.9%	6,047
<b>Bexley Total</b>	<b>11.2%</b>	<b>24.9%</b>	<b>44.0%</b>	<b>16.4%</b>	<b>3.5%</b>	<b>97,055</b>

Source: 2018 Household Survey

**Figure 3.2 Number of bedrooms by ward**



Source: 2018 Household Survey

## Property condition

- 3.13 The 2018 Household Survey reviewed the extent to which households were satisfied with the quality of their accommodation. Overall 86.1% of respondents expressed satisfaction (43.8% were very satisfied and 42.3% were satisfied); 9.0% were neither satisfied nor dissatisfied; a total of 4.9% expressed degrees of dissatisfaction, of whom 3.4% were dissatisfied and 1.5% were very dissatisfied.
- 3.14 Table 3.6 explores how the level of dissatisfaction with the quality of their accommodation varied by tenure, type and age of property. Note that the data relates to perception and across the private and social rented sectors this may be more reflective of tenant expectations in landlord responses to repairs.
- 3.15 Household Survey data indicates that households in affordable (48.0%) and private rented (28.4%) accommodation expressed higher levels of dissatisfaction than those living in owner occupation (23.6%).
- 3.16 In terms of property type and age, dissatisfaction with the quality of accommodation was highest amongst respondents living in flats/apartments (43.6%), terraced house/town house (25.6%) and semi-detached houses (20.7%) and amongst residents who knew the age of their property, the properties built 1985-2004 (10.6%).

<b>Table 3.6 Dissatisfaction with quality of accommodation by tenure, property type and property age</b>			
<b>Tenure</b>	<b>No. Dissatisfied</b>	<b>% Dissatisfied</b>	<b>Base</b>
Owner Occupier	1,101	23.6	70,922
Private Rented	1,325	28.4	11,931
Affordable	2,239	48.0	14,911
<b>Total</b>	<b>4,665</b>	<b>100.0%</b>	<b>97,764</b>
<b>Property Type</b>	<b>No. Dissatisfied</b>	<b>% Dissatisfied</b>	<b>Base</b>
Detached house	63	1.4	5,623
Semi-detached house	935	20.7	40,708
Terraced house / town house	1,158	25.6	21,870
Bungalow	98	2.2	4,767
Maisonette	105	2.3	5,490
Flat / Apartment	1,973	43.6	18,080
Other	192	4.2	517
<b>Total</b>	<b>4,524</b>	<b>100.0%</b>	<b>97,055</b>
<b>Property Age</b>	<b>No. Dissatisfied</b>	<b>% Dissatisfied</b>	<b>Base</b>
Unsure/don't know	2,377	53.2	17,692
Pre 1919	332	7.4	7,694
1919 to 1944	424	9.5	34,386
1945 to 1964	404	9.0	13,667
1965 to 1984	356	8.0	11,049
1985 to 2004	472	10.6	7,097
2005 onwards	106	2.4	4,325
<b>Total</b>	<b>4,470</b>	<b>100.0%</b>	<b>95,909</b>

Note: Response rate variations result in slight differences between base levels.

Source: 2018 Household Survey

## Repair problems

- 3.17 The 2018 Household Survey asked respondents about satisfaction with the state of repair of their home. 78.6% of respondents expressed degrees of satisfaction (34.9% satisfied and 43.7% very satisfied); 12.8% were neither satisfied nor dissatisfied; and 8.6% expressed degrees of dissatisfaction (6.7% dissatisfied and 1.9% very dissatisfied) with the state of repair.
- 3.18 Asked if their home had any repair problems, around 54.7% of households across the Borough stated that they have no repair problems. The repair problems mentioned most frequently across the Borough include windows (15.9%), dampness/mould growth (14.3%) and bathroom/toilet (14.0%).
- 3.19 Table 3.7 summarises the range of repair problems by tenure. The main repair problem among households living in owner occupation stated was concerning windows (13.2%) and in private rent the main repair issue was dampness/mould growth (31.8%). In affordable housing the main repair problem was with dampness/mould growth (26.5%) and around 40.6% said they had no repair problem, the lowest proportion amongst all the tenure categories.

**Table 3.7 Repair problems by property tenure**

Repair problem	Tenure (%)			Total
	Owner Occupier	Private rented	Affordable	
No repair problems	59.6%	41.7%	40.6%	54.7%
Brick / stonework	9.2%	9.2%	7.8%	9.0%
Roof	11.1%	10.0%	4.7%	10.0%
Windows	13.2%	20.7%	25.2%	15.9%
Kitchen	10.9%	11.8%	13.5%	11.4%
Doors	4.7%	10.1%	14.5%	6.8%
Bathroom / toilet	10.5%	22.3%	24.5%	14.0%
Cold/heating problems	5.7%	15.9%	16.6%	8.5%
Dampness / mould growth	9.0%	31.8%	26.5%	14.3%
Wiring / electrics	7.6%	12.7%	3.8%	7.6%
<i>Base (households)</i>	<i>70,922</i>	<i>11,931</i>	<i>14,911</i>	<i>97,764</i>

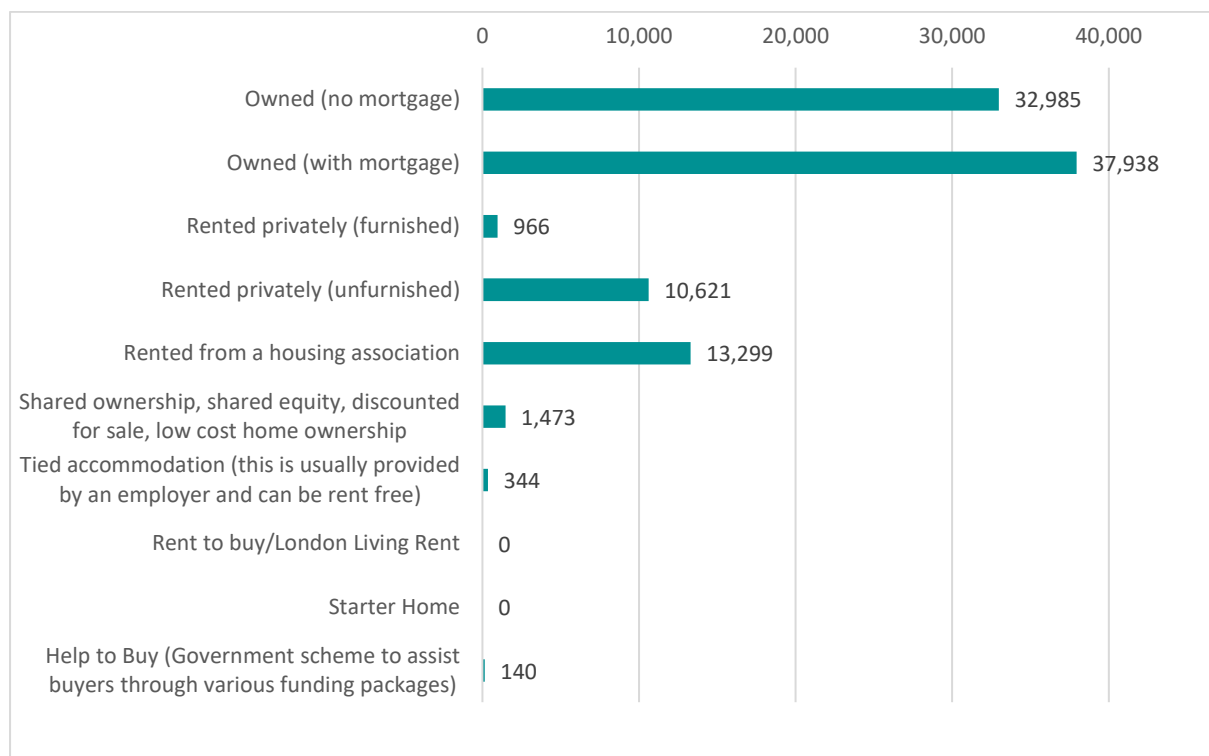
Source: 2018 Household Survey

- 3.20 The Household Survey also asked respondents why the repairs have not been done. Whilst around 29.0% of respondents said that they haven't the time, 36.7% said that they could not afford to. 23.9% said that the repairs were not their responsibility.

## Property tenure

- 3.21 Based on the findings of the 2018 Household Survey, the tenure profile of the Borough of Bexley is summarised in Figure 3.3. Overall, based on the Household Survey evidence, 72.5% of occupied dwellings are owner-occupied, 12.2% are private rented (including tied accommodation), 13.6% are rented from a social housing provider and 1.6% are intermediate tenure dwellings. The tenure profile is based on the 2011 Census as there is no comparative data available to assess the change of profile since 2011. However, it is worth noting that nationally the proportion of private rented dwellings has increased from 18.5% according to the 2011 Census to 20.3% in 2016/17 (source: 2016/17 English Housing Survey) and across Greater London the proportion has increased from 26.4% (2011 Census) to 30% in 2016/17 (source: 2016/17 English Housing Survey).
- 3.22 Assuming that the PRS has grown 10% over the period 2011 to 2016/17 which reflects national trends, the tenure profile would alter slightly to 71.2% owner occupied, 13.4% private rented and 15.2% affordable tenures.

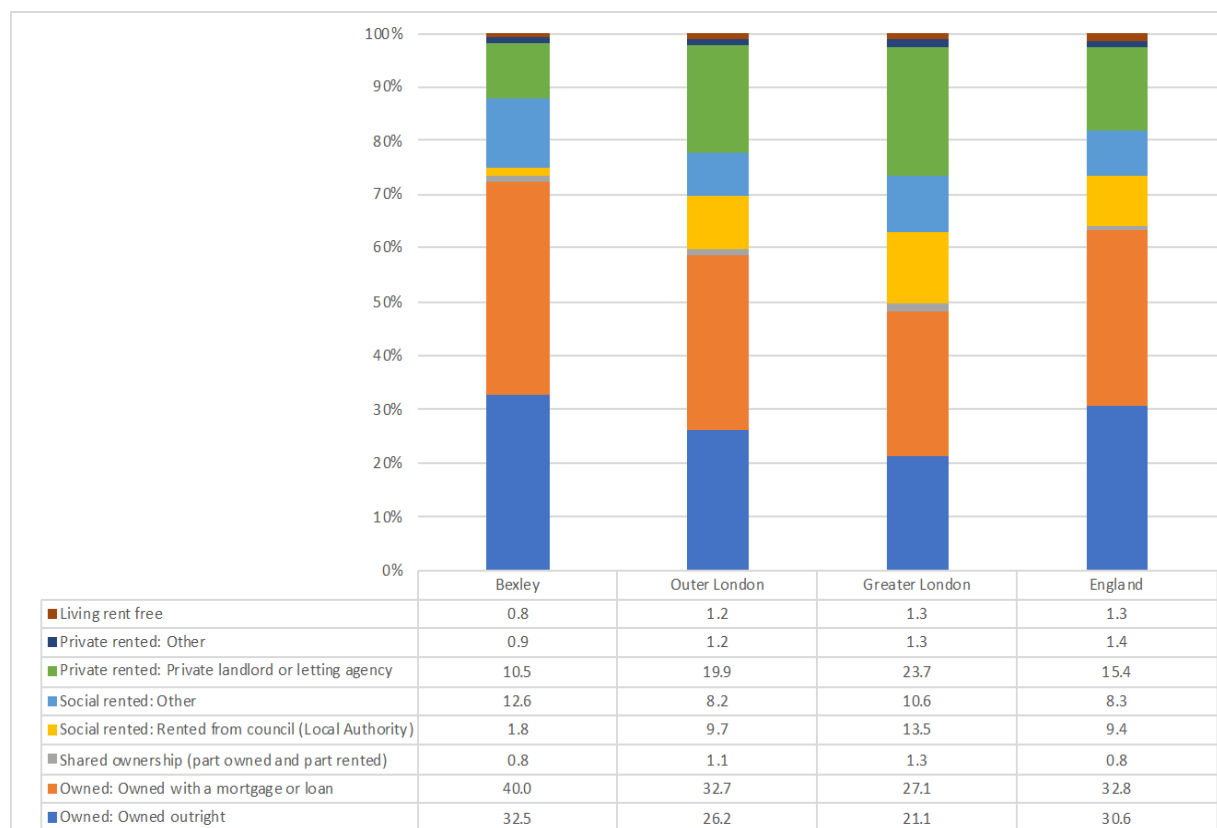
**Figure 3.3 Borough of Bexley: tenure profile of occupied dwellings**



Source: 2018 Household Survey

3.23 Figure 3.4 compares the tenure profile of the Borough with the profile of London based on 2011 Census data. Compared with these areas, the Borough had the highest level of owner occupation and the lowest proportions of private renting and affordable housing.



**Figure 3.4 Borough of Bexley: tenure profile compared with other areas****Table 3.8A Property tenure in Bexley compared with London profile**

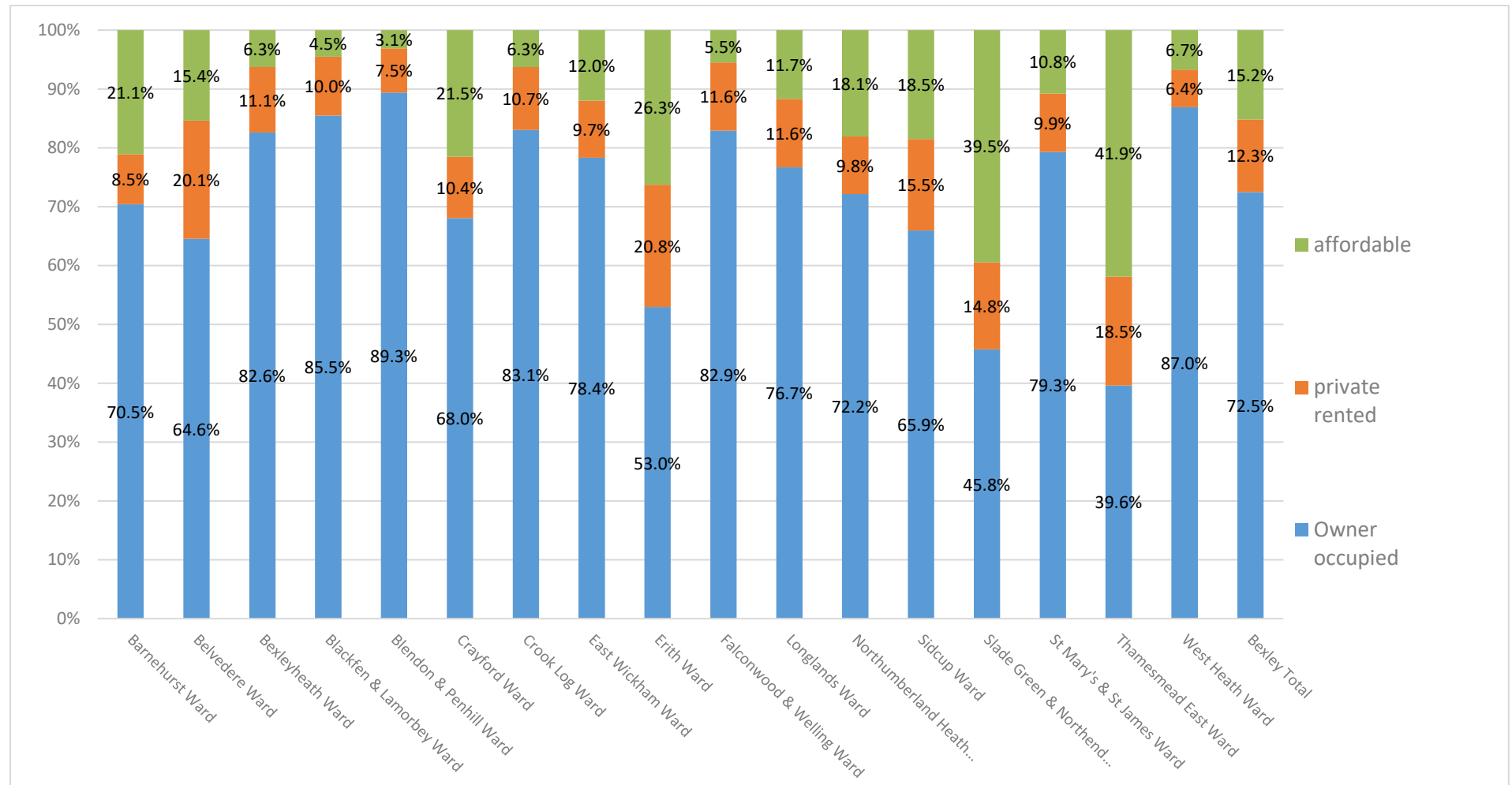
Tenure	Bexley	Outer London	Greater London	England
Owned: owned outright	32.5	26.2	21.1	30.6
Owned: owned with a mortgage or loan	40.0	32.7	27.1	32.8
Shared ownership (part owned and part rented)	0.8	1.1	1.3	0.8
Social rented: rented from council (Local Authority)	1.8	9.7	13.5	9.4
Social rented: other	12.6	8.2	10.6	8.3
Private rented: private landlord or letting agency	10.5	19.9	23.7	15.4
Private rented: other	0.9	1.2	1.3	1.4
Living rent free	0.8	1.2	1.3	1.3

3.24 The tenure profile varies across the Borough, as set out in Table 3.8B and Figure 3.5, based on the findings of the 2018 Household Survey. This indicates that the proportion of owner occupied dwellings is highest in Blendon & Penhill (89.3%) and West Heath (87.0%) Wards; private renting in Erith (20.8%) and Belvedere (20.1%) Wards; and affordable housing in Thamesmead East (41.9%) and Slade Green & Northend (39.6%) Wards.

<b>Table 3.8B Property tenure by ward</b>				
<b>Analysis area</b>	<b>Owner occupied</b>	<b>Private rented</b>	<b>Affordable</b>	<b>Base</b>
Barnehurst Ward	70.5%	8.4%	21.1%	4,569
Belvedere Ward	64.5%	20.1%	15.4%	7,001
Bexleyheath Ward	82.6%	11.1%	6.3%	6,546
Blackfen & Lamorbey Ward	85.5%	10.0%	4.5%	6,449
Blendon & Penhill Ward	89.3%	7.5%	3.1%	6,193
Crayford Ward	68.0%	10.5%	21.5%	6,662
Crook Log Ward	83.0%	10.7%	6.3%	6,363
East Wickham Ward	78.4%	9.6%	12.0%	6,148
Erith Ward	52.9%	20.8%	26.3%	4,505
Falconwood & Welling Ward	82.9%	11.6%	5.5%	6,507
Longlands Ward	76.7%	11.6%	11.7%	4,310
Northumberland Heath Ward	72.2%	9.8%	18.1%	4,187
Sidcup Ward	65.9%	15.5%	18.5%	6,863
Slade Green & Northend Ward	45.8%	14.7%	39.6%	4,867
St Mary's & St James Ward	79.3%	9.9%	10.8%	4,545
Thamesmead East Ward	39.6%	18.6%	41.9%	6,004
West Heath Ward	87.0%	6.3%	6.7%	6,047
<b>Bexley Total</b>	<b>72.5%</b>	<b>12.2%</b>	<b>15.3%</b>	<b>97,766</b>

Source: 2018 Household Survey

**Figure 3.5 Property tenure by ward**



Source: 2018 Household Survey

## Owner-occupied sector

- 3.25 The 2018 Household Survey identified that 72.5% (70,923) of households across the Borough of Bexley are owner-occupiers. 33.7% of all households (32,985) own outright and 38.8% of all households (37,938) have a mortgage.
- 3.26 The Household Survey provides the following information on owner occupied stock:
- Most owner-occupied properties are houses (82.7%), with 7.5% detached, 50.8% semi-detached and 24.4% terraced; a further 5.4% are bungalows, 11.8% flats/maisonettes and 0.2% other property types;
  - 49.7% of owner occupied properties have three bedrooms, 25.5% have four or more bedrooms; a further 20.6% have two bedrooms and 4.2% have one bedroom;
  - 9.8% of owner-occupied stock was built pre-1919, 44% was built between 1919 and 1944; 17.5% between 1945 and 1964; 14.1% between 1965 and 1984 and 14.6% has been built since 1985.
- 3.27 A range of socio-economic and demographic information on residents has been obtained from the 2018 Household Survey. Some interesting observations relating to owner-occupiers include:
- In terms of household type, 24.9% are couples with children under 18, 22.2% of owner occupiers are older (65 or over) singles and couples, 17.3% are couples (under 65 with no children), 14.0% are couples with adult children (18+), 12.1% are singles (under 65), 3.0% are lone parents with adult children and 2.7% are lone parents with children under 18, 2.1% are other household types and 1.8% are households that span more than two generations;
  - 68.3% of Household Reference People (Heads of Household) living in owner occupied dwellings are in employment, a further 24.7% are permanently sick or disabled, 3.3% are wholly retired from work and 3.6% are in other activity such as in education/training or looking after the home.
  - 16.8% of owner occupied households receive less than £18,200 gross per year, 51.2% receive between £18,200 and £49,400 per year, 26.0% receive between £49,400 and £101,400 per year and around 6.0% receive at least £101,400 per year; and
  - In terms of length of residency, 38.4% of owner occupiers have lived in the same property for 20 years or more.
- 3.28 Over the period 2000 to 2020, Land Registry data reveals that lower quartile, median and average house prices across the Borough of Bexley increased dramatically. This is summarised in Table 3.9.
- 3.29 It is interesting to note that in 2000, a household income of £19,273 was required for a lower quartile price to be affordable; by 2020 this had increased to £75,857. In comparison, an income of £25,329 was required for a median priced property to be affordable in 2000 compared with £95,143 in 2020.

Borough of Bexley	House Price		Income to be affordable*	
	Lower Quartile	Median	Lower Quartile Price	Median Price
2000	£74,950	£98,500	£19,273	£25,329
2001	£87,000	£116,973	£22,371	£30,079
2002	£109,995	£139,500	£28,284	£35,871
2003	£130,000	£163,000	£33,429	£41,914
2004	£144,995	£175,000	£37,284	£45,000
2005	£152,995	£183,000	£39,342	£47,057
2006	£159,000	£195,000	£40,886	£50,143
2007	£170,000	£212,000	£43,714	£54,514
2008	£167,000	£210,000	£42,943	£54,000
2009	£163,000	£196,000	£41,914	£50,400
2010	£170,000	£215,000	£43,714	£55,286
2011	£170,000	£215,000	£43,714	£55,286
2012	£169,000	£210,000	£43,457	£54,000
2013	£165,000	£225,000	£42,429	£57,857
2014	£175,000	£250,000	£45,000	£64,286
2015	£190,000	£275,000	£48,857	£70,714
2016	£205,000	£325,000	£52,714	£83,571
2017	£254,000	£345,000	£65,314	£88,714
2018	£285,000	£350,000	£73,286	£90,000
2019	£285,000	£357,500	£73,286	£91,929
2020	£295,000	£370,000	£75,857	£95,143

Source: Data produced by Land Registry © Crown copyright 2020

\*Assuming a 3.5x income multiple and a 10% deposit is available

### Stakeholder views on the owner-occupied sector

- 3.30 A full analysis of the findings of the online stakeholder survey is set out in Appendix E. However, relevant aspects of the findings are set out within the main report.
- 3.31 Stakeholders who took part in the online survey reported on the relative affordability of housing for sale in Bexley, offering *'good value for money'* compared with other neighbouring London Boroughs. However, house prices are high when compared with local incomes, with affordability therefore being an issue for many people.
- 3.32 Stakeholders were aware of new-build development and reported on strong demand, with the south of the Borough being particularly popular and good transport links key. Demand for new build housing was considered to come from both households currently living within Bexley and households seeking to move to the area from elsewhere.

## Private rented sector

- 3.33 The Government's Housing Strategy (November 2011) (source: Laying The Foundations; A Housing Strategy for England, 2011), set out the government's plans to boost housing supply. It recognised an increasingly important role for the private rented sector, both in meeting people's housing needs and in supporting economic growth by enabling people to move to take up jobs elsewhere and to respond to changing circumstances.
- 3.34 The private rented sector in England is growing; the Census figures for 2011 confirmed that the sector now totals 16.8%, an increase from 8.8% in 2001. Increasing house prices pre-2007 and the struggling sales market when the down turn came are both factors that have underpinned the growth of the rental market for both 'active choice' renters and 'frustrated would-be' homeowners. Tenure reform and less accessible social rented housing are also likely to be an increasing factor to the growth in the private rented sector and the sector clearly now plays a vital role in meeting housing needs as well as providing an alternative to homeownership.
- 3.35 Local authorities have an important role in ensuring that the private rented sector meets both these requirements. Balancing good quality supply with demand will help to stabilise rents and encouraging good quality management will improve the reputation of the sector and encourage longer term lets and lower turnover. However, this is a challenging task where existing partners need to be encouraged to participate and new partners and investors need to be identified.
- 3.36 The 2018 Household Survey found that the private rented sector accommodates around 12.3% (11,931) of households across the Borough of Bexley; of these 11.9% are privately rented and 0.4% live rent free or in tied accommodation.
- 3.37 In terms of the cost of renting, Tables 3.10 and 3.11 set out the comparative median and lower quartile rents for the Borough of Bexley, London, South East and England as a whole using Valuation Office Agency rental data.
- 3.38 The tables indicate that 2018/19 lower quartile (£875 pcm) and median (£1,100 pcm) rental prices are lower in the Borough of Bexley than in London as a whole but higher than the prices in the South East and England.
- 3.39 Comparing the rental price in 2018/19 with that of 2013/14 indicates that there has been an increase of around 29.4% in lower quartile and 25% in median rental prices in the Borough of Bexley during the period. The rate of increase has been higher in the Borough of Bexley than across London, the South East and England. Table 3.12 presents private rental data by number of bedrooms.

<b>Table 3.10 Comparative median rental price 2013/14-2018/19</b>			
<b>Location</b>	<b>Median price by year (£)</b>		<b>% change 2013/14-2018/19</b>
	<b>2013/14</b>	<b>2018/19</b>	
Bexley	850	1,100	29.4
London	1,300	1,495	15.0
South East	760	875	15.1
England	<b>595</b>	<b>695</b>	<b>16.8</b>

Source: VOA rental data

<b>Table 3.11 Comparative lower quartile rental price 2013/14-2018/19</b>			
<b>Location</b>	<b>Lower quartile price by year (£)</b>		<b>% change 2013/14-2018/19</b>
	<b>2013/14</b>	<b>2018/19</b>	
Bexley	700	875	25.0
London	1,000	1,200	20.0
South East	605	700	15.7
England	<b>475</b>	<b>525</b>	<b>10.5</b>

Source: VOA rental data

<b>Table 3.12 VOA Rental statistics for Bexley 2018/19</b>					
<b>No. bedrooms</b>	<b>Count of rents</b>	<b>Mean</b>	<b>Lower quartile</b>	<b>Median</b>	<b>Upper quartile</b>
Room rent	40	£577	£550	£585	£672
Studio	40	£648	£600	£675	£725
One bedroom	150	£821	£750	£825	£900
Two bedrooms	310	£1,076	£995	£1,050	£1,200
Three bedroom	210	1,293	1,200	1,300	1,400
Four or more bedroom	40	£1,579	£1,450	£1,500	£1,700

Source: Valuation Office Agency private renting statistics

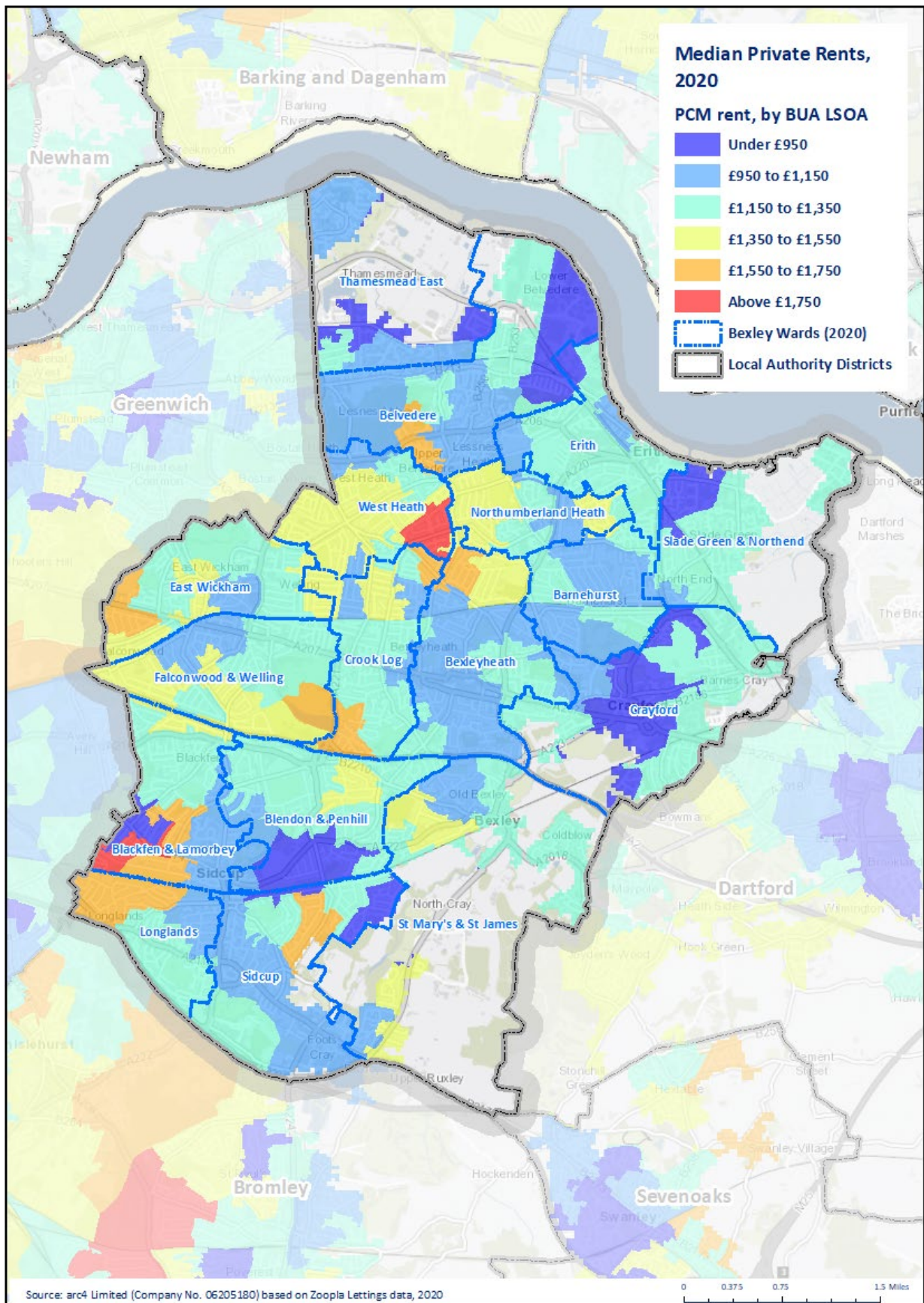
- 3.40 In terms of spatial variation, Map 3.1 and Table 3.13 show 2020 median rents across the wards. This indicates that private rents tend to be highest in the south of the Borough, and lowest in the northern wards.

<b>Table 3.13 Private rents 2020 by ward</b>		
<b>Ward</b>	<b>Lower Quartile Rent</b>	<b>Median Rent</b>
Barnehurst Ward	£1,001	£1,148
Belvedere Ward	£949	£1,148
Bexleyheath Ward	£962	£1,148
Blackfen & Lamorbey Ward	£901	£1,148
Blendon & Penhill Ward	£1,001	£1,248
Crayford Ward	£875	£1,101
Crook Log Ward	£1,101	£1,248
East Wickham Ward	£1,001	£1,248
Erith Ward	£849	£1,101
Falconwood & Welling Ward	£949	£1,200
Longlands Ward	£1,014	£1,200
Northumberland Heath Ward	£1,049	£1,248
Sidcup Ward	£949	£1,148
Slade Green & Northend Ward	£949	£1,148
St Mary's & St James Ward	£1,001	£1,200
Thamesmead East Ward	£886	£1,101
West Heath Ward	£1,101	£1,300
<b>Bexley Total</b>	<b>£949</b>	<b>£1,200</b>

Source: Zoopla Price Paid data



**Map 3.1 2020 median rents across Bexley by LSOA**



Source: Zoopla PPD 2019

- 3.41 Table 3.8 (above) indicates the proportion of stock made up of private rented dwellings by local analysis area. This indicates that the highest proportions of private rented stock are found in Erith (20.8%), Belvedere (20.1%) and Thamesmead East (18.6%) Wards.
- 3.42 The 2018 Household Survey found that 55.1% of private rented properties are flats/apartments or maisonettes, 39.6% of private rented properties are houses (of which 18.9% are terraced, 18.6% are semi-detached and 2.1% are detached); a further 3.2% are bungalows and 2.2% other types of housing. 26.2% of privately rented properties have one bedroom/bedsit, 39.5% have two bedrooms, 28.2% have three bedrooms and 6.1% have four or more bedrooms.
- 3.43 Around 6.7% of private rented stock was built before 1919 and 6.2% from 2005 onwards. Around 57.0% of respondents stated that they didn't know or were unsure when their property was built.
- 3.44 29.8% of private renting households have lived in their accommodation for less than two years.
- 3.45 In terms of income, the 2018 Household Survey found that 33.1% of households privately renting receive less than £18,200 gross per year, 50.1% receive between £18,200 and £49,400 per year, 14.7% receive between £49,400 and £101,400 per year and 2.1% receive at least £101,400 per year.
- 3.46 75.6% of Household Reference People (Heads of Household) living in private rented accommodation are employed, 7.8% are permanently sick/disabled, 3% are wholly retired from work and 13.6% are in other activity including in education/training and looking after the home.
- 3.47 For households eligible for help with their private sector rent, the amount they can receive is based on Local Housing Allowance Rates. Bexley is located in the Outer South East London Broad Rental Market Area (BRMA) (A Broad Rental Market Area is an area 'within which a person could reasonably be expected to live having regard to facilities and services for purposes of health, education, recreation, personal banking and shopping, taking account of the distance of travel, by public and private transport and from those facilities and services'. A BRMA must contain 'residential premises for a variety of types, including such premises held on a variety of tenures' PLUS 'sufficient privately rented residential premises, to ensure that, in the rent officer's opinion, the LHA for the area is representative of the rents that a landlord might reasonably be expected to obtain in that area' Source: VOA BRMA statistics) and for 2020/21, the rates are:
- Shared accommodation rate - £103.56 per week
  - 1-bedroom rate - £205.96 per week
  - 2-bedroom rate - £253.15 per week
  - 3-bedroom rate - £299.18 per week
  - 4-bedroom rate - £368.22 per week

## Affordable sector

- 3.48 The 2018 Household Survey found that there are around 14,912 households who live in an affordable (social rented or intermediate tenure) property across the Borough of Bexley, accounting for 15.3% of all occupied dwellings. Of these, 13,299 households live in accommodation rented from a housing association and 1,613 live in intermediate tenure properties, mainly shared ownership. The latest 2020 regular for Social Housing Statistics Data Return (SDR) reports a total of 14,757 affordable dwellings across the Borough.
- 3.49 The Household Survey identified that flats/apartments and maisonettes account for 59.9% of occupied affordable accommodation (52.4% flats/apartments and 7.6% maisonettes), 35.2% are houses (of which 18.2% are semi-detached, 16.6% are terraced and 0.3% are detached), 3.9% are bungalows and 1.0% other types of housing. In terms of size, affordable dwellings in Bexley typically have one/bedsit (32.6%), two (33.8%) or three (29.1%) bedrooms, with a further 4.4% having four or more bedrooms.
- 3.50 In terms of household composition, the 2018 Household Survey found that 28.2% are singles under 65, 19.1% are older singles and couples (one or both aged over 65 years), 14.4% are couples with children under 18, 14.1% are lone parents with children under 18, 13.8% are couples or lone parents with adult children living at home, 6.7% are couples under 65 with no children, 1.8% are households that span more than two generations and a further 1.8% are other household types.
- 3.51 Amongst the older households (13.1% of whom are singles over 65 and 6.0% are couples), 38.8% have lived in their current affordable property for over 20 years or more. Almost 60.0% live in a flat/maisonette, around 12.0% live in a terraced house and 13.4% live in a semi-detached property. Around 54.0% of those aged over 65 live in a 1 bedroom property and 24.7% live in a 2 bedroom property.
- 3.52 54.5% of Household Reference People living in affordable housing are in employment. A further 17.7% are wholly retired from work, 17.6% are permanently sick/disabled, 5.2% are unemployed and 7.4% look after the home/are caring for someone.
- 3.53 Incomes are generally low, with 63.2% of households in affordable housing receiving an income of less than £18,200 gross per year (and around 10.0% receive less than £5,200 per year). A further 34.3% receive between £18,200 and £49,400 per year and 2.4% receive over £49,400 per year.
- 3.54 In terms of the potential to encourage higher-earning households currently living in affordable accommodation to consider intermediate tenure products, the Household Survey data indicates that less than 3.0% of these households have a gross annual income of £49,400 or more. The cheapest intermediate product in the Borough of Bexley according to the tenure options data requires an income of £47,571 and therefore only a small proportion living in affordable housing can achieve the transition from affordable to intermediate housing.

## Stakeholder and estate agent views on affordable housing

- 3.55 The stakeholder survey included a number of registered providers and housing associations who work within the Bexley area.
- 3.56 In terms of new affordable housing development in the Borough, site availability was mentioned as a barrier, along with the constraints of government policy decisions regarding rental income. Shared ownership was identified as a preferred affordable housing product, predominantly for singles, couples and some families.
- 3.57 The key message from stakeholders regarding affordable housing was the need for an increase in supply.

## Relative affordability of housing tenure options

- 3.58 The relative cost of alternative housing options across the Borough of Bexley and the ward areas is explored in Table 3.14. This includes affordable and market rent options and intermediate tenure options, including London Living Rent. Table 3.15 shows the income required for alternative tenure options to be affordable and Table 3.16 presents the assumptions underpinning the analysis. Note that the model assumes that all tenures are available in all wards although in reality some tenure options may not be currently available.
- 3.59 Table 3.15 indicates that for open market housing at Borough-level the minimum gross income required is £32,537 (for lower quartile or entry-level renting) or £75,857 (for lower quartile or entry-level house prices). These amounts do vary by area, for example income requirements for entry-level renting range between £29,109 in Erith Ward and £44,571 in West Heath Wards. For entry-level home ownership, income requirements range between £46,286 in Erith and £92,571 in West Heath Wards.

<b>Table 3.14 Cost of alternative tenure options by ward</b>									
<b>Tenure option</b>	<b>Price (2020)</b>								
	<b>Barnehurst Ward</b>	<b>Belvedere Ward</b>	<b>Bexleyheath Ward</b>	<b>Blackfen &amp; Lamorbey Ward</b>	<b>Blendon &amp; Penhill Ward</b>	<b>Crayford Ward</b>	<b>Crook Log Ward</b>	<b>East Wickham Ward</b>	<b>Erith Ward</b>
Social Rent (average)	£472	£472	£472	£472	£472	£472	£472	£472	£472
Affordable Rent (monthly cost)	£918	£918	£918	£918	£998	£881	£998	£998	£881
London Affordable Rent	£690	£690	£690	£690	£690	£690	£690	£690	£690
London Living Rent	£1,040	£981	£1,190	£1,220	£1,192	£1,092	£1,259	£1,174	£995
Market Rent - Lower Quartile	£1,001	£949	£962	£901	£1,001	£875	£1,101	£1,001	£849
Market Rent - Median	£1,148	£1,148	£1,148	£1,148	£1,248	£1,101	£1,248	£1,248	£1,101
Market Rent - Average	£1,180	£1,114	£1,142	£1,137	£1,259	£1,085	£1,300	£1,205	£1,100
Market Sale - Lower Quartile	£298,500	£229,000	£295,000	£350,000	£346,000	£220,000	£342,500	£327,500	£210,000
Market Sale - Median	£346,500	£300,000	£385,000	£408,000	£425,000	£303,000	£411,250	£390,000	£300,000
Market Sale - Average	£354,866	£290,384	£405,627	£452,949	£437,739	£416,104	£427,686	£377,642	£363,254
London Shared Ownership (50%)	£173,250	£150,000	£192,500	£204,000	£212,500	£151,500	£205,625	£195,000	£150,000
London Shared Ownership (25%)	£86,625	£75,000	£96,250	£102,000	£106,250	£75,750	£102,813	£97,500	£75,000
Help to buy	£346,500	£300,000	£385,000	£408,000	£425,000	£303,000	£411,250	£390,000	£300,000
Discounted Home Ownership (30%)	£242,550	£210,000	£269,500	£285,600	£297,500	£212,100	£287,875	£273,000	£210,000
Discounted Home Ownership (25%)	£259,875	£225,000	£288,750	£306,000	£318,750	£227,250	£308,438	£292,500	£225,000
Discounted Home Ownership (20%)	£277,200	£240,000	£308,000	£326,400	£340,000	£242,400	£329,000	£312,000	£240,000

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Tenure option	Falconwood & Welling Ward	Longlands Ward	Northumberland Heath Ward	Sidcup Ward	Slade Green & Northend Ward	St Mary's & St James Ward	Thamesmead East Ward	West Heath Ward	Bexley Total
Social Rent (average)	£472	£472	£472	£472	£472	£472	£472	£472	£472
Affordable Rent (monthly cost)	£918	£918	£918	£918	£998	£881	£998	£998	£960
London Affordable Rent	£690	£690	£690	£690	£690	£690	£690	£690	£690
London Living Rent	£1,040	£981	£1,190	£1,220	£1,192	£1,092	£1,259	£1,174	£1,113
Market Rent - Lower Quartile	£1,001	£949	£962	£901	£1,001	£875	£1,101	£1,001	£949
Market Rent - Median	£1,148	£1,148	£1,148	£1,148	£1,248	£1,101	£1,248	£1,248	£1,200
Market Rent - Average	£1,180	£1,114	£1,142	£1,137	£1,259	£1,085	£1,300	£1,205	£1,244
Market Sale - Lower Quartile	£298,500	£229,000	£295,000	£350,000	£346,000	£220,000	£342,500	£327,500	£295,000
Market Sale - Median	£346,500	£300,000	£385,000	£408,000	£425,000	£303,000	£411,250	£390,000	£369,000
Market Sale - Average	£354,866	£290,384	£405,627	£452,949	£437,739	£416,104	£427,686	£377,642	£435,073
London Shared Ownership (50%)	£173,250	£150,000	£192,500	£204,000	£212,500	£151,500	£205,625	£195,000	£184,500
London Shared Ownership (25%)	£86,625	£75,000	£96,250	£102,000	£106,250	£75,750	£102,813	£97,500	£92,250
Help to buy	£346,500	£300,000	£385,000	£408,000	£425,000	£303,000	£411,250	£390,000	£369,000
Discounted Home Ownership (30%)	£242,550	£210,000	£269,500	£285,600	£297,500	£212,100	£287,875	£273,000	£258,300
Discounted Home Ownership (25%)	£259,875	£225,000	£288,750	£306,000	£318,750	£227,250	£308,438	£292,500	£276,750
Discounted Home Ownership (20%)	£277,200	£240,000	£308,000	£326,400	£340,000	£242,400	£329,000	£312,000	£295,200

Source: Data produced by Land Registry © Crown copyright 2018, Zoopla 2018, CLG

<b>Table 3.15 Income required for alternative tenure options</b>									
<b>Tenure option</b>	<b>Price (2020)</b>								
	<b>Barnehurst Ward</b>	<b>Belvedere Ward</b>	<b>Bexleyheath Ward</b>	<b>Blackfen &amp; Lamorbey Ward</b>	<b>Blendon &amp; Penhill Ward</b>	<b>Crayford Ward</b>	<b>Crook Log Ward</b>	<b>East Wickham Ward</b>	<b>Erith Ward</b>
Social Rent (average)	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199
Affordable Rent (monthly cost)	£31,488	£31,488	£31,488	£31,488	£34,231	£30,199	£34,231	£34,231	£30,199
London Affordable Rent	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657
London Living Rent	£35,654	£33,618	£40,784	£41,841	£40,863	£37,428	£43,175	£40,255	£34,113
Market Rent - Lower Quartile	£34,320	£32,537	£32,983	£30,891	£34,320	£30,000	£37,749	£34,320	£29,109
Market Rent – Median	£39,360	£39,360	£39,360	£39,360	£42,789	£37,749	£42,789	£42,789	£37,749
Market Rent – Average	£40,457	£38,194	£39,154	£38,983	£43,166	£37,200	£44,571	£41,314	£37,714
Market Sale - Lower Quartile	£76,757	£58,886	£75,857	£90,000	£88,971	£56,571	£88,071	£84,214	£54,000
Market Sale – Median	£89,100	£77,143	£99,000	£104,914	£109,286	£77,914	£105,750	£100,286	£77,143
Market Sale – Average	£91,251	£74,670	£104,304	£116,473	£112,561	£106,998	£109,976	£97,108	£93,408
London Shared Ownership (50%)	£59,191	£51,420	£65,722	£69,617	£72,505	£52,061	£70,266	£66,733	£51,660
London Shared Ownership (25%)	£44,960	£39,099	£49,910	£52,860	£55,050	£39,616	£53,375	£50,715	£39,339
Help to buy	£69,300	£60,000	£77,000	£81,600	£85,000	£60,600	£82,250	£78,000	£60,000
Discounted Home Ownership (30%)	£65,835	£57,000	£73,150	£77,520	£80,750	£57,570	£78,138	£74,100	£57,000
Discounted Home Ownership (25%)	£70,538	£61,071	£78,375	£83,057	£86,518	£61,682	£83,719	£79,393	£61,071
Discounted Home Ownership (20%)	£75,240	£65,143	£83,600	£88,594	£92,286	£65,794	£89,300	£84,686	£65,143

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<b>Table 3.15 Income required for alternative tenure options</b>									
<b>Tenure option</b>	<b>Falconwood &amp; Welling Ward</b>	<b>Longlands Ward</b>	<b>Northumberland Heath Ward</b>	<b>Sidcup Ward</b>	<b>Slade Green &amp; Northend Ward</b>	<b>St Mary's &amp; St James Ward</b>	<b>Thamesmead East Ward</b>	<b>West Heath Ward</b>	<b>Bexley Total</b>
Social Rent (average)	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199	£16,199
Affordable Rent (monthly cost)	£32,914	£32,914	£34,231	£31,488	£31,488	£32,914	£30,199	£35,657	£32,914
London Affordable Rent	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657	£23,657
London Living Rent	£40,467	£43,659	£33,155	£44,593	£42,246	£34,919	£31,576	£41,923	£38,160
Market Rent - Lower Quartile	£32,537	£34,766	£35,966	£32,537	£32,537	£34,320	£30,377	£37,749	£32,537
Market Rent - Median	£41,143	£41,143	£42,789	£39,360	£39,360	£41,143	£37,749	£44,571	£41,143
Market Rent - Average	£41,691	£43,989	£42,137	£41,246	£39,943	£42,651	£82,080	£45,531	£42,651
Market Sale - Lower Quartile	£88,714	£75,857	£78,814	£64,286	£67,886	£90,000	£59,143	£94,757	£75,857
Market Sale – Median	£102,407	£109,286	£91,543	£84,600	£83,571	£112,371	£79,457	£107,357	£94,886
Market Sale – Average	£106,658	£111,104	£91,442	£220,116	£87,955	£119,389	£73,150	£108,017	£111,876
London Shared Ownership (50%)	£68,186	£72,711	£61,163	£56,665	£56,028	£74,862	£53,411	£71,658	£62,968
London Shared Ownership (25%)	£51,830	£55,255	£46,541	£43,153	£42,680	£56,914	£40,720	£54,510	£47,813
Help to buy	£79,650	£85,000	£71,200	£65,800	£65,000	£87,400	£61,800	£83,500	£73,800
Discounted Home Ownership (30%)	£75,668	£80,750	£67,640	£62,510	£61,750	£83,030	£58,710	£79,325	£70,110
Discounted Home Ownership (25%)	£81,072	£86,518	£72,471	£66,975	£66,161	£88,961	£62,904	£84,991	£75,118
Discounted Home Ownership (20%)	£86,477	£92,286	£77,303	£71,440	£70,571	£94,891	£67,097	£90,657	£80,126

Source: Data produced by Land Registry © Crown copyright 2018, Zoopla 2018, CLG, London Living Rent based on 2021/22 prices



<b>Table 3.16 Assumptions in assessing income required for alternative tenure options</b>		
<b>Tenure</b>	<b>Tenure price assumptions</b>	<b>Affordability assumptions</b>
Social rent (Genuinely Affordable)	2020 Rents from Regulator of Social Housing Statistical Data return (SDR)	Up to 35% of gross income is affordable
Affordable Rent (Affordable)	Based on 80% of median market rent	Up to 35% of gross income is affordable
London Affordable Rent (Genuinely Affordable)	Affordable homes based on social rent levels for low income households. Based on 2020 Affordable Rent data from SDR return	Up to 35% of gross income is affordable
London Intermediate Rent ('London Living Rent') (Genuinely Affordable)	Homes for middle-income households struggling to save for a deposit based on a third of average local household incomes and adjusted for the number of bedrooms – a significant discount on market rent in most London Boroughs. Data based on 2021/22 ward-level prices	Up to 35% of gross income is affordable
Market Rent – lower quartile	Prevailing prices	Up to 35% of gross income is affordable
Market Rent – median	Prevailing prices	Up to 35% of gross income is affordable
Market Rent – upper quartile	Prevailing prices	Up to 35% of gross income is affordable
Market Sale – lower quartile	Prevailing prices	90% LTV, 3.5x gross income
Market Sale – median	Prevailing prices	90% LTV, 3.5x gross income
Market Sale – average	Prevailing prices	90% LTV, 3.5x gross income
London Shared ownership (50%)	Total price based on median price and 50% ownership. Mortgage based on 40%. 10% deposit on total price, annual service charge £395, Annual rent based on 2.75% of remaining equity	90% LTV, 3.5x gross income for equity and 35% of income for rental element
London Shared ownership (25%)	Total price based on median price and 35% ownership. Mortgage based on 30%. 5% deposit on total price, annual service charge £395, Annual rent based on 2.75% of remaining equity	90% LTV, 3.5x gross income for equity and 35% of income for rental element

<b>Table 3.16 Assumptions in assessing income required for alternative tenure options</b>		
<b>Tenure</b>	<b>Tenure price assumptions</b>	<b>Affordability assumptions</b>
Discounted home ownership (30%)	30% discount on full value (assumed to be median), 5% deposit on full price, remainder mortgage based on 3.5x income (similar to proposed FirstHome product)	90% LTV, 3.5x gross income
Discounted Home Ownership (25%)	30% discount on full value (assumed to be median), 5% deposit on full price, remainder mortgage based on 3.5x income	90% LTV, 3.5x gross income for equity and 35% of income for rental element
Discounted Home Ownership (20%)	20% discount on full value (assumed to be median), 5% deposit on full price, remainder mortgage based on 3.5x income	90% LTV, 3.5x gross income for equity and 35% of income for rental element
London Help to buy	Total price based on median price. Mortgage based on 55% equity. 40% loan and deposit of 5%. Loan fee of 1.75% in year 6 of outstanding equity loan increasing annually from yr7 at RPI+1%	95% LTV, 3.5x gross income for equity

- 3.60 Figure 3.6 summarises the relative affordability of alternative tenures at the Borough level, setting out the income and deposit required for different options set against prevailing lower quartile and median earnings. It uses lower quartile and median earnings derived from the ONS Annual Survey of Hours and Earnings for 2020.
- 3.61 This indicates that only social/London Affordable Rents are affordable for households on lower quartile earnings. For households on median earnings, all rental options are affordable in addition to lower quartile renting. Shared ownership at 25% was just outside the affordable threshold for median income households
- 3.62 The comparison of local incomes with the cost of local house prices and rents illustrates the affordability challenge faced by residents within the Borough of Bexley. It also shows the particular problem faced by households who do not have either existing equity or savings to buy on the open market.

**Figure 3.6 Borough of Bexley household income and housing costs**



Source: Data produced by Land Registry © Crown copyright 2020, Zoopla 2019, MHLG, ONS ASHE

Note: The deposit requirements are shown on the table as a negative number

## Concluding comments

- 3.63 The purpose of this chapter has been to explore the current housing market dynamics affecting and influencing the housing market within the Borough. This chapter has provided detail on the current profile of dwellings by type, tenure and size along with property condition and property prices.
- 3.64 The 2018 Household Survey shows that the majority of properties in the Borough are houses (70.3%), 24.3% are flats/apartments/maisonettes, 4.9% are bungalows and 0.5% other types of housing. 36.1% of properties have one or two bedrooms, 44.0% of existing properties contain three bedrooms and a further 19.9% contain four or more bedrooms.
- 3.65 While 72.5% of households live in owner occupation and a further 12.2% in private rented accommodation, an analysis of house prices and private rental costs indicates that open market housing has become hugely more expensive in the Borough in recent years and remains above the national average prices.
- 3.66 Despite this, the 2018 Household Survey reveals that only 15.2% of the housing stock is affordable accommodation. The highest proportions of this stock tenure are located within Thamesmead East (41.9%) and Slade Green & Northend (39.6%) Wards.
- 3.67 The relative affordability of alternative tenures has been analysed and overall a household income of at least £16,199 is required for social rent (excluding housing benefit), at least £23,657 for London Affordable Rent and at least £38,160 for London Living Rent. In terms of open market options, an income of £32,537 is needed for entry-level market renting (lower quartile) and £75,857 for entry-level open market purchase (lower quartile).

## 4. Future housing need

### Introduction

- 4.1 This chapter considers the future number of dwellings needed across the Borough of Bexley. The chapter should be read in conjunction with the ‘London Borough of Bexley Demographic update’ report prepared by Edge Analytics (August 2021) which considers:
- the housing need standard method outcome based on December 2020 Planning Practice Guidance (PPG)
  - the underlying demographics of the borough, alternative demographic scenarios, future economic scenarios and whether housing targets need to be adjusted to support economic growth.
- 4.2 The Edge Analytics report considers the periods 2018 to 2038.

### Establishing housing need using the ‘standard method’

- 4.3 The 2021 National Planning Policy Framework (NPPF) (Paragraph 60) states *‘to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for’.*
- 4.4 PPG defines housing need as ‘an unconstrained assessment of the number of homes needed in an area’ (PPG Paragraph: 001 Reference ID: 2a-001-20190220).
- 4.5 PPG comments that ‘the standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. It identifies a minimum annual housing need figure. It does not produce a housing requirement figure.’(PPG Paragraph: 002 Reference ID: 2a-002-20190220).
- 4.6 In December 2020, Planning Practice Guidance updated the standard methodology for assessing overall housing need which involves: setting a baseline; adjusting for affordability; capping increases where necessary and applying uplifts in some urban areas; and considering if it is appropriate to plan for a higher housing need figure.

### Step 1: Setting the baseline (2021-2031)

- 4.7 Planning Practice Guidance states that a baseline should be set using 2014-based national household projections for the local authority area. The projections are used to calculate the average annual household growth over a 10-year consecutive period. (PPG Paragraph 004 Reference ID: 2a-004-

20201216). This is taken as the period 2021 to 2031 to provide the most up to date assessment of minimum housing need under the standard method.

- 4.8 Over the period 2021 to 2031, DGLG 2014-based household projections are set to increase by 12,719 or 1,272 each year (Table 4.1). Table 4.1 also considers alternative GLA projections (explained in Table 4.2) which generally show a lower level of household growth.

Projection	2021 households	2031 households	2021-31 Household change	Annual Change
DCLG 2014-based	104,115	116,834	12,719	1,272
GLA 2016-based Central	103,283	114,862	11,579	1,158
GLA 2016-based short-term	103,995	116,721	12,726	1,273
GLA 2016-based long-term	103,325	115,010	11,685	1,169

Projection	Parameters	Use
Central	10-year average of domestic migration, international migration in-flows and out-migration	Informs the London Plan. Projection is considered the most appropriate for medium to long-term strategic planning
Short-term	5-year average of domestic migration, international migration in-flows and out-migration	Closest in assumptions and results to the ONS sub-national population projections. Projection is appropriate for use in work with a short (up to ten year) horizon and as an alternative to the Central projection for use in sensitivity testing
Long-term	15-year average of domestic migration, international migration in-flows and out-migration	The long-term trend provides a scenario with lower net migration for London. This projection is considered most appropriate as an alternative to the Central projection for use in sensitivity testing

## Step 2: An adjustment to take account of affordability

- 4.9 The average annual projected household figure from Step 1 is the adjusted based on the affordability of the area using median workplace-based affordability ratios published by the ONS.

$$\text{Adjustment factor} = 1 + ((\text{Local Affordability Ratio} - 4)/4) * 0.25$$

- 4.10 The latest affordability ratio (2020) and associated affordability uplift is set out in Table 4.3.

Year	Median price to income affordability ratio	Adjustment factor*
2020	<b>11.97</b>	1.498

\* Adjustment factor is  $1 + ((\text{Local Affordability Ratio} - 4)/4) * 0.25$

4.11 The reason for the affordability adjustment is set out in PPG:

*‘An affordability adjustment is applied as household growth on its own is insufficient as an indicator of housing demand because:*

- *household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and*
- *people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.*

*The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.’* (PPG Paragraph 006 Reference ID: 2a-006-20190220).

4.12 Table 4.4 sets out the components of the dwelling need calculation using 2021 as a base year and 2020 affordability ratios. The basic demographic need under the 2014-based DCLG household projections are presented along with the affordability adjustment to establish the total annual dwelling need using the standard methodology.

Time period	Baseline annual demographic need	Affordability Adjustment	Adjustment factor	Total dwelling need under standard methodology
2021-2031	1,272	633	1.498	1,905

4.13 This establishes an annual need for 1,905 dwellings.



### Step 3: Capping the level of any increase

- 4.14 PPG states that ‘the standard methodology may identify a minimum local housing need figure that is significantly higher than the number of homes currently being planned for. The cap is applied to help ensure that the minimum local housing need figure calculated using the standard methodology is as deliverable as possible’ (PPG Paragraph 007 Reference ID: 2a-007-20190220). The PPG continues ‘the cap reduces the minimum number generated by the standard method but does not reduce housing need itself. Therefore, strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible’ (PPG Paragraph 007 Reference ID: 2a-007-20190220).
- 4.15 How the cap is calculated ‘depends on the current status of relevant strategic policies for housing’ (PPG Paragraph 004 Reference ID: 2a-004-20201216).
- 4.16 The 2021 London Plan is the latest adopted plan and this establishes a 10 year target of 6,850 and an annual target of 685.
- 4.17 The PPG states ‘where these policies have been adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies. (Paragraph: 004 Reference ID: 2a-004-20201216). The cap is therefore 959 dwellings each year.

### Step 4: Cities and urban centres uplift

- 4.18 A 35% uplift is then applied for those urban local authorities in the top 20 cities and urban areas list devised by ONS (PPG Paragraph 004 Reference ID: 2a-004-20190220). This applies to London Boroughs. The capped housing need figure of 959 is therefore uplifted by 35%. Planning Practice Guidance says ‘it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs. (Paragraph: 034 Reference ID: 2a-034-20201216).

### Housing need using the standard methodology

- 4.19 Based on the December 2020 PPG standard methodology and 2020 affordability ratios, the minimum local housing need for the Borough of Bexley , from 2021, is **1,295** dwellings each year.

### Potential adjustments to the standard method

#### Overview

- 4.20 Having identified the minimum housing need under the standard model, further demographic analysis considers alternative demographic scenarios. A review of alternative demographic scenarios provides the evidence to confirm if the standard method provides an appropriate base for the assessment of need or whether there are any exceptional circumstances that would justify an alternative approach.
- 4.21 There is also provision in PPG to adjust the minimum housing need:

*'The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).*

*Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.'* (PPG Paragraph 010 Reference ID: 2a-010-20201216).

#### 4.22 To inform this analysis:

- Edge Analytics have reviewed variant population scenarios, alternative migration scenarios, housing-led and employment-led scenarios and different rates of household formation.
- The Council has provided details of relevant growth strategies and strategic infrastructure developments and any decisions to meet unmet need from neighbouring local authorities.

4.23 Table 4.5 sets out alternative dwelling need under a series of alternative demographic scenarios. Full details are available in the Edge Analytics Demographic Update report August 2021. Table 4.5 includes alternative Household Representative Rates (HRRs). HRRs are defined as the probability of anyone in the particular demographic group being classified as a household representative. Although the latest evidence continues to suggest that the level of household formation has fallen from historic levels, many Local Plans are responding to national policy initiatives aimed at reversing this trend. It is likely that younger age groups have seen the most significant change in household formation due to a combination of housing undersupply and affordability issues,

which in some areas may have led to ‘suppressed’ rates of household formation. Two headship rates are considered in Table 4.5:

- HH14 refers to the headship rates underpinning the 2014-based ONS population projections (SNPP-2014).
- HH14-R sensitivity considers the impact of returning household formation rates to their 2001 values across 25-34 and 35-44 age groups.

Scenario	Description	Annual dwelling need under alternative Household Representative Rates	
		HH-14	HH14R
Standard Method	Models the population impact of the MHCLG's standard method target based on December 2020 Planning Practice Guidance. Calculation based on 2021-2031 period and 2020 affordability ratios	1,295	
SNPP 2014	Replicate the ONS 2014-based SNPP <i>Principal</i> projection, using historical population evidence for 2001–2014.	1,319	1,712
GLA-2016 Central	Replicated the GLA 2016-based Central scenario, using historical population evidence 2001-2016.	1,181	1,568
GLA-2019 High	Replicates the GLA 2019-based High scenario, using historical population evidence for 2001–2019. This scenario assumes higher levels of international migration. Internal migration assumptions are based on a ten-year period (2009/10–2018/19).	1,157	1,564
GLA-2019 Central Upper	Replicates the GLA 2019-based Central Upper scenario, using historical population evidence for 2001–2019. Migration assumptions are based on a ten-year period (2009/10–2018/19).	1,086	1,479
GLA-2019 Central Lower	Replicates the GLA 2019-based Central Lower scenario, using historical population evidence for 2001–2019. Internal migration assumptions are based on a five-year period (2014/15–2018/19). International migration assumptions are based on a ten-year period (2009/10–2018/19).	1,036	1,431
GLA-2019 Low	Replicates the GLA 2019-based Low scenario, using historical population evidence for 2001–2019. This scenario assumes lower levels of international migration. Internal migration assumptions are based on a ten-year period (2009/10–2018/19).	976	1,349
SNPP-2018 High	Replicates the ONS 2018-based SNPP Higher Migration scenario, using historical population evidence for 2001–2018. This variant assumes higher levels of international migration.	942	1,317
PG-2020 Long Term	Uses an ONS 2020 MYE base year and calibrates its migration assumptions from a nineteen-year period (2001/02–2019/20).	820	1,190
PG-2020 Short Term	Uses an ONS 2020 MYE base year and calibrates its migration assumptions from a six-year period (2014/15–2019/20).	805	1,178
SNPP-2018 Low	Replicates the ONS 2018-based SNPP Lower Migration scenario, using historical population evidence for 2001–2018. This variant assumes lower levels of international migration.	688	1,027

Source: Edge Analytics Bexley Demographic Update August 2021 Tables 1 and 3

### Alternative demographic evidence

- 4.24 The standard method need calculation establishes a minimum housing need of 1,295 dwellings each year. Only one of the alternative demographic scenarios under the 2014 headship rates (HH14) results in a higher housing need. However, under the HH14-return scenario which considers a return to 2001 levels of household formation, 7 scenarios result a higher level of need than the standard method calculation. The highest need is 1,744 under the SNPP 2014 HH-14 return scenario.
- 4.25 PPG is clear that the 2014-based projections provide the basis for the standard method calculation. There are no exceptional circumstances that would justify an alternative approach to establishing a minimum housing need figure. However, the demographic analysis does suggest that higher annual delivery may need to be considered if there is a change in the level of household formation.

### Regeneration Strategies and strategic infrastructure improvements

- 4.26 The Bexley Growth Strategy was adopted December 2017. This is a non-statutory document which sets out the Council's strategic vision and objectives for the Borough's future development. The strategy sets out that, subject to the provision of the right levels of infrastructure in the right locations, how up to 31,500 new homes and 17,500 new jobs can be delivered across the Borough over a 30 year time horizon under a 'High Good Growth' scenario. This would equate to the annualised delivery of around 1,050 dwellings each year. However, this scale of delivery is dependent upon government funding for new transport hubs, land and infrastructure in advance of development otherwise a 'lower good growth figure' would result.
- 4.27 No further uplifts to the housing number are necessary to support this level of dwelling need.

### Meeting unmet need from other local authorities

- 4.28 The 2021 London Plan carefully considered the distribution of housing growth across London. The Borough has not been asked to meet unmet need for other areas.

### Affordable housing need

- 4.29 A detailed analysis of affordable housing need in accordance with PPG is presented at Technical Appendix C. This establishes an overall gross affordable need of 2,021 and after taking into account affordable lettings and newbuild the net shortfall is 1,378 each year based on unmet need being cleared over 20 years. This justifies the need for a robust affordable housing policy. The Council does not need to meet this in full as PPG says 'the total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes (PPG Paragraph 024

Reference ID: 2a-024-20190202). However, the Council should be mindful of the 2021 London Plan strategic target of 50% of new dwellings across London to be genuinely affordable.

- 4.30 The recommended tenure split is 70% social/affordable rented and 30% affordable home ownership.
- 4.31 Given the considerable uplift in overall housing need based on the standard method, a further upwards adjustment to accommodate more affordable housing is not suggested.

### Housing to support economic growth

- 4.32 Edge Analytics have considered the impact of each demographic scenario upon potential employment growth within the Borough. This considers the relationship between population and employment using key assumptions on economic activity rates, unemployment and commuting as set out in their report. The economic activity rates determine the estimated annual change in the Borough's resident labour force, whilst the unemployment rate and commuting ratio links the labour force to workplace-based employment in the Borough.
- 4.33 The average annual employment change 2018-38 which can be supported under alternative scenarios ranges between +365 and +935 under alternative demographic scenarios.
- 4.34 The Council should compare this with any plans for strategic jobs growth to ensure that dwelling needs reflect wider corporate objectives. Any potential adjustment to the housing need figure can then be proposed if required.

### Older and specialist housing need

- 4.35 The SHMA in Chapter 5 evidences a need for around 1,376 additional units of older persons accommodation to 2038 which includes 928 C3 planning use class units such as Extra Care and sheltered/retirement housing and 448 units of C2 residential care units. This translates to an annual need for 46 C3 units and 22 C2 units. It is anticipated that the C3 need will be delivered as part of the housing need figure and no further adjustments are necessary. There is also likely to be an ongoing need for a small number of specialist housing units for people with additional needs which is expected to be accommodated within the housing need figure.

### Previous delivery levels

- 4.36 Table 2.8 set out annual dwelling completions over the period 2012/13 to 2018/19 and compared this with policy targets. This indicates that the actual level of delivery has been consistently above annual targets since 2012/13. PPG notes that **‘the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.’** As the standard method is being followed, and there are no shortfalls in delivery, no adjustment for previous delivery levels is required.

## Alternative approaches to the standard method

- 4.37 Within PPG (Paragraph: 001 Reference ID: 2a-001-20190220) there is provision to use an alternative to the standard method where exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. This chapter has carefully reviewed the relevant aspects of the standard method which would warrant an alternative approach to housing numbers to be considered. No exceptional circumstances have been identified.

## Concluding comments

- 4.38 The 2021 London Plan has established a target of 6,850 net dwellings to be built in the Borough of Bexley over the period 2019/20 to 2028/29 or 685 each year.
- 4.39 The 2020 standard method calculation establishes a baseline minimum annual need for 1,295 dwellings based on demographics, an adjustment to take account of affordability, a cap linked to the London Plan figure and a cities and urban centres uplift. A comprehensive analysis of alternative demographic scenarios confirms that this standard method baseline provides an appropriate base for the assessment of need.
- 4.40 The 1,295 minimum need provides sufficient housing to meet local demographic, affordable and specialist needs. This compares with an average delivery of 506 dwellings over the past 7 years (2012/13 to 2018/19).

## 5. Affordable Housing Need

### Introduction

- 5.1 The 2021 NPPF (Paragraph 62) requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy. It sets out that these should include, but not be limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.
- 5.2 The 2021 NPPF (Paragraph 63) also states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required.
- 5.3 PPG considers how the housing need of particular groups relates to overall housing need calculated using the standard model:

**‘This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.**

**Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:**

- **The overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);**
- **The extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and**
- **The anticipated deliverability of different forms of provision, having regard to viability’**

**The household projections that form the baseline of the standard method are inclusive of all households including Travellers as defined with Planning Policy for Traveller Sites’ (source: Paragraph 001 Reference ID: 67-001-20190722).**

- 5.4 In considering the need for different types of housing, the PPG makes specific reference to: affordable housing, housing for older people, housing for people with disabilities, the private rented sector, self-build and custom housebuilding and student housing.
- 5.5 This chapter uses evidence from secondary data sources and the Household Survey to assess affordable housing requirements in the Borough. Chapter 7 then considers the needs of particular groups through primary and secondary data analysis and through discussions with key stakeholders. The evidence



presented will assist the Council and its strategic partners in making policy decisions regarding future housing development.

## Affordable Housing Needs Assessment

- 5.6 A robust and defensible assessment of affordable housing need is essential for the development of housing policies.
- 5.7 The 2021 NPPF defines affordable housing as follows:  
'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)...' (Annex 2).
- 5.8 The 2019 NPPF provides detailed definitions of different forms of affordable housing (see Appendix B); there are also specific London tenures, defined by the Mayor of London. These definitions are set out in Chapter 1 of this report.
- 5.9 This section considers affordable housing need for those households who cannot afford to meet their needs in the open market through home ownership or private rental.
- 5.10 Two sources of evidence have been considered in the assessment of affordable housing need: firstly, analysis based on 2018 Household Survey evidence and relevant secondary data; and secondly analysis based on the Council's housing register.

## Assessing affordable housing need using the 2018 Household Survey

- 5.11 The 2018 Household Survey provided a range of evidence on the scale and range of need within communities across the Borough. Detailed analysis is presented at Appendix C of this report and follows PPG. The needs analysis has been updated to take account of change in house and rental prices, along with changes in affordable supply through relets and sales.
- 5.12 Table 5.1 sets out housing need across the Borough based on the Household Survey and reasons for household need. This shows that there are 13,631 existing households in need, which represents 13.9% of all households.

<b>Table 5.1 Housing need in the Borough of Bexley</b>		
<b>Category</b>	<b>Factor</b>	<b>Borough of Bexley Total</b>
Homeless households or with insecure tenure	N1 Under notice, real threat of notice or lease coming to an end	1,283
	N2 Too expensive, and in receipt of housing benefit or in arrears due to expense	1,114
Mismatch of housing need and dwellings	N3 Overcrowded according to the 'bedroom standard' model	6,002
	N4 Too difficult to maintain	1,268
	N5 Couples, people with children and single adults over 25 sharing a kitchen, bathroom or WC with another household	2,514
	N6 Household containing people with mobility impairment or other special needs living in unsuitable accommodation	2,161
Dwelling amenities and condition	N7 Lacks a bathroom, kitchen or inside WC and household does not have resource to make fit	370
	N8 Subject to major disrepair or unfitness and household does not have resource to make fit	535
Social needs	N9 Harassment or threats of harassment from neighbours or others living in the vicinity which cannot be resolved except through a move	1,072
<b>Total no. households in need (with one or more housing needs)</b> Note this is <u>not</u> the sum of the factors listed above because households can experience more than one of these needs		<b>13,631</b>
Total Households		97,728
<b>% households in need</b>		<b>13.9%</b>

**Note:** A household may have more than one housing need.

Source: 2018 Household Survey

5.13 Table 5.2 summarises overall housing need (before further analysis to test the extent to which households can afford open market provision to offset their need) by ward and the extent to which housing need varies across the Borough. The proportion of households in need is highest in the Thamesmead East (30.0% of households) and Slade Green & Northend (20.3%) Wards and lowest in Crook Log (7.7%) and Blendon & Penhill (8.1%) Wards.

Ward	No. of households in need	% of households in need	Total No. households
Barnehurst Ward	627	13.7	4,569
Belvedere Ward	1317	18.8	7,001
Bexleyheath Ward	639	9.8	6,546
Blackfen & Lamorbey Ward	763	11.8	6,449
Blendon & Penhill Ward	500	8.1	6,193
Crayford Ward	979	14.7	6,662
Crook Log Ward	489	7.7	6,363
East Wickham Ward	787	12.8	6,148
Erith Ward	847	18.8	4,505
Falconwood & Welling Ward	829	12.7	6,507
Longlands Ward	393	9.1	4,310
Northumberland Heath Ward	632	15.1	4,187
Sidcup Ward	712	10.4	6,863
Slade Green & Northend Ward	986	20.3	4,866
St Mary's & St James Ward	458	10.1	4,545
Thamesmead East Ward	1801	30.0	6,003
West Heath Ward	874	14.5	6,047
<b>Borough Total (households in need)</b>	<b>13,631</b>	<b>13.9</b>	<b>97,728</b>

Source: 2018 Household Survey

5.14 Table 5.3 demonstrates how the proportion of households in housing need varies by tenure and household type for the Borough. Private rented households are more likely to be in housing need, at 30.8% of households, followed by 26.6% in affordable housing and 8.4% of owner occupiers.

Tenure	No. H'holds in need	% H'holds in need	Total no. households
Owner Occupier	5,983	8.4	70,922
Private Rented	3,679	30.8	11,931
Affordable	3,967	26.6	14,911
<b>Borough Total (All households in need)</b>	<b>13,631</b>	<b>13.9</b>	<b>97,764</b>

Source: 2018 Household Survey

5.15 Table 5.4 sets out housing need by type of household. Households that span more than two generations (62.2%) and larger families with dependent children (couples and lone parents) are more likely to be in housing need (37.2% of couples and 66.9% of lone parents with three or more children under 18 in Bexley are in housing need). The Household Survey data identifies 15,146 households with adult children living with parent(s), which provides a broad indication of the scale of hidden housing need. Of these, 2,490 were categorised as being in housing need (16.4%), although this rises to 25.0% of

households with lone parents and adult children (compared with 13.9% of couples with adult children).

<b>Household Type</b>	<b>No. H'holds in need</b>	<b>% H'holds in need</b>	<b>Total no. households</b>
Single Adult (under 65)	1880	11.9%	15772
Single Adult (65 or over)	568	6.1%	9316
Couple only (both under 65)	822	5.5%	14832
Couple only (one or both over 65)	509	5.0%	10177
Couple with at least 1 or 2 child(ren) under 18	1737	9.8%	17767
Couple with 3 or more children under 18	1811	37.2%	4862
Couple with child(ren) aged 18+	1614	13.9%	11643
Lone parent with at least 1 or 2 child(ren) under 18	1075	23.9%	4499
Lone parent with 3 or more children under 18	851	66.9%	1272
Lone parent with child(ren) aged 18+	876	25.0%	3503
Household that spans more than two generations	1079	62.2%	1735
Other	811	34.5%	2351
<b>Borough Total (All households in need)</b>	<b>13633</b>	<b>13.9%</b>	<b>97728</b>

Source: 2018 Household Survey

- 5.16 In addition to establishing the overall affordable housing requirements, analysis considers the supply/demand variations property designation (i.e. general needs and older person) and property size (number of bedrooms). Analysis provides a gross figure (absolute shortfalls in affordable provision) and a net figure (which takes into account supply of existing affordable accommodation). Modelling suggests an annual gross imbalance of 2,021 dwellings and after taking account of affordable supply an annual net imbalance of 1,378 affordable dwellings across the Borough of Bexley as shown in Table 5.5. This represents an increase on the net need of 965 evidenced in the 2020 SHMA update.
- 5.17 In terms of the size of affordable housing required, when the likely annual affordable supply is taken into account, the overall shortfalls are 17.1% one-bedroom, 59.3% two-bedroom, 17.0% three-bedroom, 5.1% four or more-bedroom general needs and 1.5% older person dwellings. It is therefore appropriate for the continued delivery of affordable housing to reflect underlying need.
- 5.18 Analysis is based on the next ten years and in the absence of any updated information this should be extrapolated forward over the period to 2038.

**Table 5.5 Net annual affordable housing imbalance by property size and designation 2018/19 to 2022/23**

Designation	No. Beds	%	Number
General Needs	1	17.1	236
	2	59.3	816
	3	17.0	235
	4	4.2	58
	5	0.8	12
Older person	1	1.1	16
	2	0.2	3
	3	0.2	3
Total		100.0	1378

Sources: 2018 Household Survey; RP CORE Lettings and Sales

## Tenure split

- 5.19 In order to consider an appropriate affordable housing tenure split, the SHMA considers London and national policy, past trends in delivery and the relative affordability of alternative tenure options. Household income is not available from the housing register but CAMEO household income data and Household Survey data have been used to investigate the relative affordability of different tenure options.
- 5.20 Policy H6 of the 2021 London Plan sets out a split of affordable products that should be applied to development:
- A minimum of 30% low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;
  - A minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared Ownership;
  - the remaining 40% to be determined by the borough as low cost rented homes or intermediate products based on identified need.
- 5.21 The NPPF also states that 10% of dwellings on larger sites should be made available for affordable home ownership.
- 5.22 Table 5.6 sets out evidence relating to affordable housing tenure based on the relationship between local household incomes to house prices and actual affordable tenure delivery. These data help to establish an appropriate tenure split which takes account of the London Plan policy and local need. Updated analysis would indicate that a 66% rented and 34% intermediate tenure split would be appropriate for the Borough of Bexley (which concurs with the 2014 SHMA). Based on this updated information, a broad target of 70% rented and 30% intermediate tenure remains appropriate.

Tenure option	% based on affordability comparing local household incomes to price*	Actual delivery 2015/16 to 2019/20	Recommended target
Social/affordable	64.9	67.0	70.0
Intermediate	35.1	33.0	30.0
Total	100.0	100.0	100.0

\*Based on analysis of 2018 Household Survey incomes to prices using a 50% shared ownership price based on 2020 values

### Property type preferences

5.23 Analysis of property type preferences is based on what existing households in need would accept and the range of dwellings moved into by newly forming households requiring affordable accommodation. Analysis of property type preferences suggests that a mix of houses (39.6%) and flats (53.2%) is appropriate along with a small number of bungalows/level access dwellings (4.0%) and other types of property (3.0%).

Type preferences	Existing (%)	Newly-forming (%)	Total (%)
House	53.0	37.3	39.8
Flat	24.7	58.6	53.2
Bungalow	14.1	2.1	4.0
Other	8.2	2.0	3.0
<b>Total</b>	100.0	100.0	100.0
Base	324	1,697	2,021

Based on what existing households in need would accept and the average of what newly-formed households have moved to in the past 5 years and intend to move to.

Source: 2018 Household Survey

### Assessing affordable housing need using housing register evidence

5.24 The Bexley housing register provides a useful snapshot of the range of households needing affordable housing in the Borough and have registered their needs with the Council. There were 6,580 applicants on the Housing Register in October 2018. Table 5.8 summarises the range of households on the list by current tenure. The housing register as of September 2021 had 6,819 applicants. However, no detailed breakdown of the reasons why households were on the register were available. This section therefore uses the information from 2018.

<b>Table 5.8 Current tenure of households on the housing register</b>		
<b>Current Tenure</b>	<b>Number</b>	<b>%*</b>
<b>Existing household - not in social/affordable rented accommodation</b>	<b>3599</b>	<b>57.4</b>
In Council-provided Private Rented Leased accommodation	329	5.2
In Council temporary/emergency accommodation	852	13.6
Private Tenant	2368	37.7
Other private	50	0.8
<b>Existing households - in social/affordable</b>	<b>1733</b>	<b>27.6</b>
<b>Newly-forming households</b>	<b>908</b>	<b>14.5</b>
Sharing with friends/relatives	754	12.0
Lodging	46	0.7
No fixed abode	75	1.2
Armed Forces	30	0.5
Other	3	0.0
<b>From specialist accommodation</b>	<b>34</b>	<b>0.5</b>
<b>Not Specified</b>	<b>306</b>	
<b>TOTAL</b>	<b>6,580</b>	6274

\*Excluding current tenure not specified

- 5.25 Overall, 57.4% of applicants are existing households not currently in social/affordable renting (of this number 37.7% are living in the private rented sector and 18.8% were living in Council provided private rented leased accommodation or temporary/emergency accommodation). A further 27.6% are existing households already in social/affordable rented housing. Only 14.5% are newly forming households and of these 12.0% were sharing with friends or relatives. The register also includes 30 households who were moving from armed forces accommodation.
- 5.26 In terms of age profile:
- 22.7% were aged under 30;
  - 29.7% were aged 30-39;
  - 35.8% were aged 40-59; and
  - 11.7% of applicants were aged 60 and over
- 5.27 The main reasons for being on the housing register are summarised in Table 5.9. The three dominant reasons for being on the housing register were community contribution (29.8%) i.e. there is an economic, voluntary/carer or educational reason why the accommodation is needed; overcrowding 24.2% and homelessness (19.2%). Community contribution would include housing need for key workers.

<b>Reason</b>	<b>Number</b>	<b>%</b>
Community Contribution	1963	29.8
Overcrowded	1592	24.2
Homeless	1263	19.2
Tenant Transfer	599	9.1
Medial Need	359	5.5
Under occupier	291	4.4
Exceptional	160	2.4
Regeneration Scheme	142	2.2
Sheltered	113	1.7
Young People Leaving Care	34	0.5
Statutory Overcrowded	31	0.5
Armed Forces	30	0.5
Reciprocal	2	0.0
Prohibition Order	1	0.0
<b>Total</b>	<b>6580</b>	<b>100.0</b>

- 5.28 The housing register does not provide income information or details on the location choices of applicants. However, assuming that all households on the register cannot afford open market prices or rents, modelling of affordable need based on housing register data can proceed.
- 5.29 By applying the PPG methodology for assessing housing need, the annual net imbalance of affordable need based on the housing register evidence was calculated to be 517 each year using 2018 housing register data (Table 5.10). Using data from the 2021 housing register and updated information on affordable relets, sales and newbuild, the 2021 housing register would suggest a shortfall of 958 each year.
- 5.30 This remains lower than that reported in analysis based on 2018 Household Survey evidence and likely to reflect the fact that the housing register reports more acute levels of need compared with the wider survey evidence which also includes those households in need but not expressing a need for affordable housing on the housing register.



<b>Table 5.10 Needs Assessment Summary for Bexley</b>			
<b>Step</b>	<b>Stage and Step description</b>	<b>Calculation</b>	<b>Bexley Total</b>
<b>Stage 1: CURRENT NEED</b>			
<b>1.1</b>	<b>TOTAL in need and cannot afford open market (buying or renting)</b>	<b>Total</b>	<b>5,883</b>
<b>Stage 2: FUTURE NEED</b>			
2.1	New household formation (Gross per year)	Based on 1.435% national household formation rate	<b>2,255</b>
2.2	Number of new households requiring affordable housing	% based on likely numbers on the register	<b>41.6%</b>
2.2	Number of new households requiring affordable housing	Number cannot afford	<b>937</b>
2.3	Existing households falling into need	Annual requirement	<b>included in 1.1</b>
<b>2.4</b>	<b>TOTAL newly-arising housing need (gross each year)</b>	<b>2.2 + 2.3</b>	<b>937</b>
<b>Stage 3: AFFORDABLE HOUSING SUPPLY</b>			
3.1	Affordable dwellings occupied by households in need	Households in 1.1 who are in affordable dwellings	<b>1,796</b>
3.2	Surplus stock	Vacancy rate <2% so no surplus stock assumed	<b>0</b>
3.3	Committed supply of new affordable units	Estimated over 5 years	<b>765</b>
3.4	Units to be taken out of management	None assumed	<b>0</b>
3.5	Total affordable housing stock available	3.1+3.2+3.3-3.4	<b>2,561</b>
3.6	Annual supply of social re-lets (net)	Annual Supply (3yr ave)	<b>587</b>
3.7	Annual supply of intermediate affordable housing available for re-let or resale at sub-market levels	Annual Supply (3yr ave)	<b>56</b>
3.8	<b>Annual supply of affordable housing</b>	<b>3.6+3.7</b>	<b>643</b>
<b>Stage 4: ESTIMATE OF ANNUAL HOUSING NEED</b>			
4.1	Total backlog need	1.1-3.5	<b>3,322</b>
4.2	Quota to reduce over 5 years (20%)		<b>20%</b>
4.3	Annual backlog reduction	Annual requirement	<b>664</b>
4.4	Newly-arising need	2.4	<b>937</b>
4.5	Total annual affordable need	4.3+4.4	<b>1,601</b>
4.6	Annual affordable capacity	3.8	<b>643</b>
4.7	<b>NET ANNUAL SHORTFALL (4.5-4.6)</b>	<b>NET</b>	<b>958</b>

## Property size

- 5.31 Analysis of the property size needs of households on the housing register results in the profile of stock presented in Table 5.11.

**Table 5.11 Net annual affordable housing imbalance by property size and designation based on housing register evidence**

	General Needs			Older Person	Total
	1 Bed	2 Beds	3+ Bed		
Borough total	345	304	272	38	<b>958</b>
% data	36.0	31.7	28.3	4.0	100.0

## Evaluation of affordable need evidenced from the Household Survey and housing register

- 5.32 There is a marked divergence in the scale of affordable need evidenced through the Household Survey and the housing register. Additionally, there is a skewing of need from households on the housing register towards smaller dwellings.
- 5.33 The key reason for this is that the Household Survey provides a wider expression of need as it takes into account households in need who have not chosen to present themselves to the Council and become registered with Bexley Homechoice. The Household Survey evidence also allows a review of dwelling type and tenure preferences and factors in the extent to which households in need can afford open market solutions.
- 5.34 It would be recommended that the needs evidenced from the housing register is acknowledged as a core level of need, but there is a broader measure of need from the Household Survey which points to a more diverse range of affordable dwellings to be built across the Borough.

## Summary

- 5.35 This chapter and the associated appendices provide a clear definition of housing need and affordable housing required, along with a step-by-step explanation of the housing needs assessment model.
- 5.36 Analysis has identified a total of 13,631 existing households in housing need, representing 13.9% of all households across the Borough of Bexley based on Household Survey evidence.
- 5.37 Updated affordable housing need analysis which takes account of changes in affordable supply and house/rental price changes since 2018 reveals that there is a net annual imbalance of 1,378 affordable dwellings across the Borough based on the Household Survey and an annual imbalance of 958 based on 2021 housing register data.
- 5.38 Overall, analysis would suggest an affordable tenure split of 66% social rented/London Affordable Rent and 34% intermediate tenure based on trends in delivery over the past 5 years and the income profiles of households in need derived from Household Survey evidence.

- 5.39 In terms of the size of affordable dwellings required, analysis based on the Household Survey indicates the following affordable need by dwelling size: 18.2% one-bedroom, 59.4% two-bedroom, 17.2% three-bedroom, 5.1% four or more-bedroom. Evidence from the housing register points to a higher need for smaller dwellings.
- 5.40 The previous 2014 SHMA evidenced an annual affordable shortfall of 837 each year, with a tenure split of 66% rented and 34% intermediate tenure.

## 6. The needs of different groups

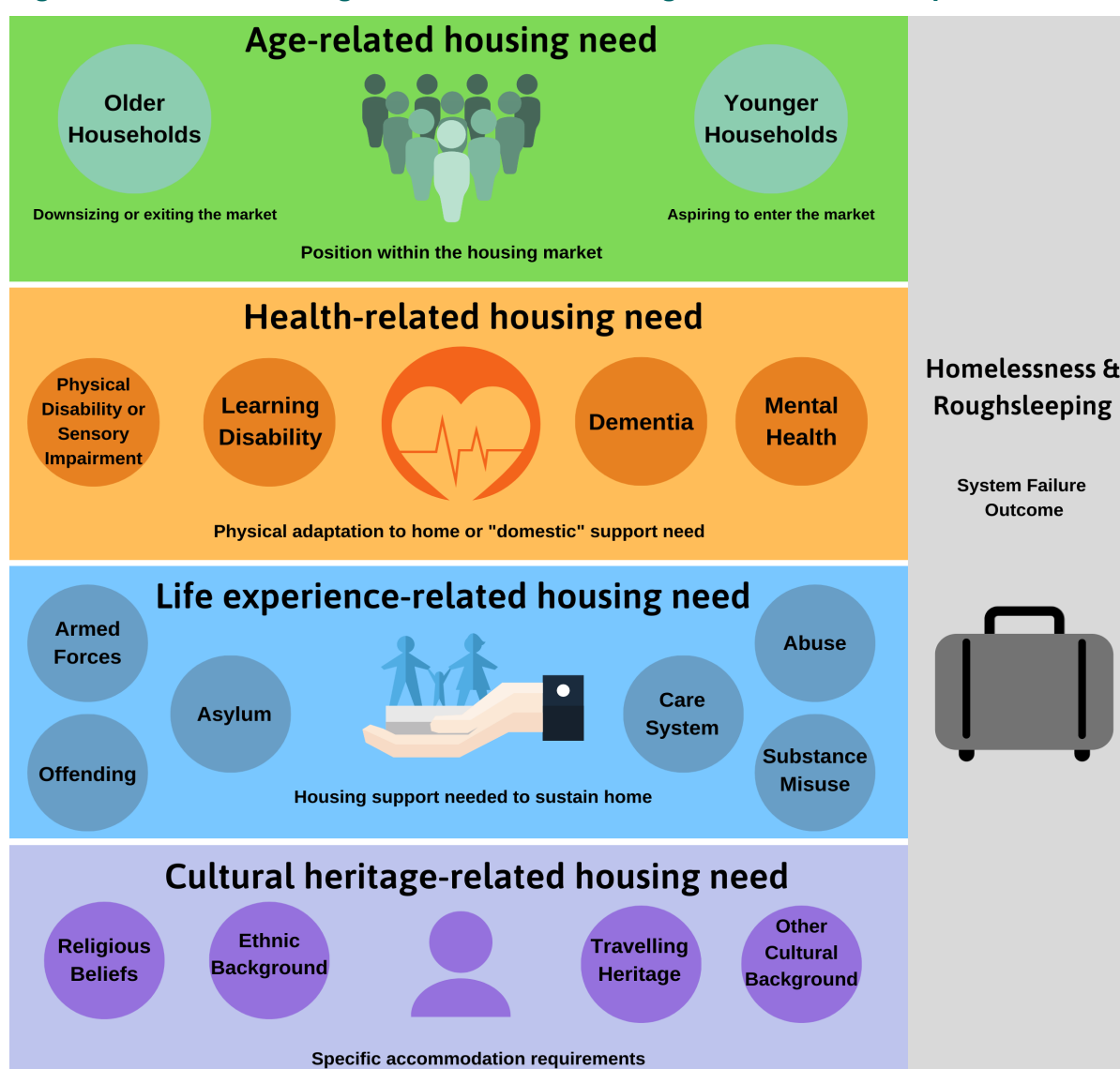
### Introduction

6.1 Paragraph 61 of the NPPF refers to housing needs for different groups in the community and these fall into two broad groups: housing for people with additional needs and housing for specific household types.

### Housing for people with additional needs

6.2 This group includes older people and accommodation for people with disabilities which are further sub-divided into those with health-related and life-experience related needs as summarised in Figure 6.1.

**Figure 6.1** Establishing need associated with age, health and life experience



The evidence base has been established based around these broad principles:

- people with additional needs are generally accommodated in mainstream housing and provided with care and support when needed;

- some people will have complex and multiple needs and therefore may fall into several different categories of need;
  - some people require long-term accommodation to provide support for ongoing needs; and some require short-term supported housing which aims to support people for a period of time before moving on/back into mainstream housing; and
  - most people with additional needs will not need specialist supported housing but they may need adaptations to their homes and/or care and support provided in other ways.
- 6.3 A range of data has been collected to assess the housing needs of people with disabilities and additional needs. This section considers data which sets out the likely scale of residents who have particular disabilities and additional needs; and then considers any evidence regarding the nature of dwelling stock required to help meet the needs of different groups.
- 6.4 The data assembled falls into the following categories:
- national sources including the Census, national disability prevalence rates applied to the Borough population, Disability Living Allowance statistics;
  - data from the 2018 Household Survey;
  - qualitative data obtained from service providers within the Council through in-depth discussions;
  - quantitative data obtained from service providers and the Insight Team at the Council (and at this juncture the support and excellent range of evidence provided should be acknowledged);
  - feedback from stakeholder consultation events for people with additional needs; and
  - feedback from general stakeholder consultation carried out as part of the SHMA process.
- 6.5 It should be noted that there can be variation in the estimates of residents with particular disabilities and additional needs. There are several reasons for this, for instance a person may self-report as having an illness/disability on the 2011 Census or the 2018 Household Survey but not be known to service providers; and some data may be collected for specific administrative purposes, for instance when someone presents themselves to service providers for assistance. There are also variations in the timescales for data reported across different groups. Therefore, the data is not necessarily consistent across each of the needs groups, but a genuine attempt has been made to compile available data from published sources, primary research and data from Council officers and consider the accommodation needs of particular groups.

### Establishing the overall level of disability/support needs across the Borough

- 6.6 A range of sources can be drawn upon to establish the overall scale of disability/support needs across the Borough. The extent to which specific

accommodation for different groups may be required is then explored using available data and specific gaps in understanding are also highlighted.

- 6.7 The data available from a range of sources are now explored to establish a broad measure of the overall level of disability/support needs across the Borough, drawing upon: the Joint Strategic Needs Assessment (JSNA); 2011 Census; Household Survey evidence; likely prevalence based on national rates; data provided through the Council’s Insight Team and the Council’s Market Position Statement 2015-2018.

### Household Survey evidence

- 6.8 Across the Borough of Bexley, the 2018 Household Survey identified 44,969 people who stated they had an illness/disability (18.2% of residents). A total of 36,940 households (37.8%) contained at least one person with at least one illness/disability.
- 6.9 Table 6.1 summarises the proportion of households containing someone with a particular illness or disability by ward. The most frequently mentioned illnesses/disabilities across the whole Borough are long-standing health conditions (7.5%), physical mobility/impairment (4.9) and ‘other’ (3.4%).

<b>Illness/disability</b>	<b>Number of people</b>	<b>As % of population</b>
Physical / mobility impairment	12034	4.9
Learning disability / difficulty	3065	1.2
Mental health problem	7880	3.2
Visual impairment	3781	1.5
Hearing impairment	7500	3.0
Long standing illness or health condition	18577	7.5
Older Age-related illness or disability	2623	1.1
Other	8333	3.4
Total residents with one or more illness/disability	44,969	18.2

Source: 2018 Household Survey

Note people could state more than one illness/disability

### 2015-2018 Adult Social Care Market Position Statement

- 6.10 The Market Position Statement sets out a range of intelligence on prevalence rates across a range of groups to assist with evidence-based commissioning of housing and support. The document encourages care providers from all sectors to develop innovative proposals that address the demands highlighted in the document. A diverse range of service provision is sought to help achieve commissioning principles and overarching vision for Adult Social Care in Bexley which is to:
- Prevent or delaying care and support needs;
  - Intervening early to help people maintain independence and avoid admission into hospital;

- Ensuring ‘joined-up’ services with health colleagues;
  - Greater choice and control, including personal budgets to develop ‘the local care market to ensure the quality and diversity of provision’;
  - Safeguarding: everyone is treated with dignity and respect;
  - Improve the outcomes for residents: a sustainable system that supports the most vulnerable people and delivers value for money; and
  - Support people to live as independently as possible.
- 6.11 Evidence in the MPS for particular needs groups is presented where appropriate in this chapter.
- 6.12 In-depth interviews with Adult Social Care Commissioners indicated that the JSNA had been updated and that one of the biggest challenges in Bexley in housing and public health is a major childhood and adult obesity rate (as per JSNA). This drives them to want the SHMA to contain the need for the creation of healthy environments to live in and new built environments to encourage alternative transport other than cars. This point was emphasised in a meeting with the Director of Public Health who also highlighted the importance of good design in housing. He cited the legacy of Thamesmead and the unsafe routes inherent in its design.
- 6.13 Other issues were identified as:
- learning disability out of area placements particularly for people with challenging and difficult needs – all the specialist units are out of area;
  - mental health – there is very little supported housing; and
  - applications from people experiencing homelessness – mental health is disproportionately represented.
- 6.14 The following sections relate to specific needs groups and draw together available evidence on the number of people with particular disabilities/additional needs. Any relevant information from stakeholders is also presented along with available evidence of particular housing or support needs for the needs group.

## Age-related housing need

- 6.15 Age-related housing need relates to the needs of specific age groups in the housing market due to life events and the impact this has on the need for dwellings of particular sizes/types and affordability. For older households this includes ‘rightsizing’ and adaptation of existing dwellings. For younger households, affordability is a particular concern and this has been considered elsewhere in the report. For this section we therefore focus upon the needs of older persons for particular unit types.

## Housing for older people

- 6.16 The NPPF Annex 2 defines older people as **‘people over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing can encompass accessible, adaptable**

**general needs housing through to the full range of retirement and specialist housing for those with care and support needs.'**

- 6.17 PPG recommends the following are considered in an assessment of older persons need:
- The future need for specialist accommodation (including but not restricted to age-restricted general market housing, retirement living or sheltered accommodation, Extra Care or housing with care), broken down by type and tenure.
  - The need for care in residential care and nursing homes (C2).
  - The need for co-housing communities.
  - The role of general housing and in particular bungalows and homes that can be adapted to meet a change in needs.
- 6.18 PPG notes that **'plan-making authorities will need to count housing provided for older people against their housing requirement'** (source: PPG June 2019 Paragraph: 016 Reference ID: 63-016-20190626).
- 6.19 Over the period 2018 to 2038, the number of people aged 65 and over is expected to increase by 33.3% and by 2038 there will be an additional 13,550 residents aged 65 and over.
- 6.20 The 2018 household survey indicates that the majority of people aged 55 and over (71.5%) want to remain in their current home with help and support when needed (Table 6.2). There is also interest in a range of options including sheltered, Extra Care, co-housing and open market accommodation from older age groups.



<b>Table 6.2 Older persons' housing options</b>				
<b>Housing option</b>	<b>% would consider by age group</b>			
	<b>55-64</b>	<b>65-74</b>	<b>75+</b>	<b>All 55+</b>
Continue to live in current home with support when needed	60.4	78.5	84.7	71.5
Buying a property on the open market	31.0	20.9	7.4	22.1
Rent a property from a private landlord	1.6	1.3	0.7	1.3
Rent from a housing association	13.1	3.5	3.9	8.2
Sheltered accommodation – renting from housing association	14.8	14.0	14.0	14.4
Sheltered accommodation – renting from private landlord	1.5	1.6	2.6	1.8
Sheltered accommodation – buying	13.1	19.6	17.2	15.9
Sheltered accommodation – shared ownership	2.2	2.1	2.4	2.2
Extra Care housing – renting from housing association	10.0	8.0	10.0	9.5
Extra Care housing – renting from private landlord	0.4	1.1	1.6	0.9
Extra Care housing – buying	8.8	14.6	15.3	12.0
Extra Care housing – shared ownership	0.9	2.0	2.1	1.5
Residential care home	4.1	5.4	11.8	6.5
Co-housing	4.9	6.4	4.7	5.3
Go to live with children or other relatives/friends	5.4	2.5	5.8	4.8
Other	3.5	1.3	2.9	2.8
<i>Base (total households responding)</i>	11,860	6,400	6,583	24,843

Source: 2018 Household Survey

6.21 Tables 6.3 and 6.4 summarise the data at ward and Borough level. This evidence suggests a need to continue to diversify the range of older persons' housing provision. Additionally, providing a wider range of older persons' accommodation has the potential to free-up larger family accommodation.

**Table 6.3 Older person housing options being considered (%)**

Older persons option	Ward					
	Barnehurst Ward	Belvedere Ward	Bexleyheath Ward	Blackfen & Lamorbey Ward	Blendon & Penhill Ward	Crayford Ward
Continue to live in current home with support when needed	82.5	76.5	82.9	79.0	80.1	71.5
Buying a property in the open market	21.7	17.0	23.0	20.6	17.9	18.6
Rent a property from a private landlord	0.0	1.6	0.9	0.9	4.8	0.0
Rent from HA	5.4	9.7	0.9	2.0	7.3	5.7
Sheltered Accommodation - Renting from HA	4.8	20.5	13.7	7.8	6.7	12.1
Sheltered Accommodation - Renting from Private Landlord	1.1	2.9	2.8	0.0	5.5	2.1
Sheltered Accommodation - Buying	12.2	11.7	19.8	20.7	26.9	10.2
Sheltered Accommodation - Shared Ownership	1.1	0.0	4.6	2.0	0.9	2.9
Extra Care Housing - Renting from HA	7.5	13.5	10.9	6.8	7.2	10.6
Extra Care Housing - Renting from Private Landlord	1.1	2.9	0.9	0.0	1.6	0.0
Extra Care Housing - Buying	14.3	3.1	21.4	17.2	20.0	5.1
Extra Care Housing - Shared Ownership	0.0	0.0	4.6	3.9	1.8	2.9
Residential Care Home	6.6	6.3	15.2	10.4	11.3	3.9
Co-housing	5.3	0.0	11.0	9.8	1.8	5.4
Go to live with children or other relatives	10.2	8.1	6.8	4.5	0.8	5.1
Other	3.4	0.0	2.8	4.5	0.9	1.0
Base (households responding)	1,088	1,784	2,003	1,581	1,537	1,917

Source: 2018 Household Survey

**Table 6.3 Older person housing options being considered (%) continued**

Older persons option	Ward					
	Crook Log Ward	East Wickham Ward	Erith Ward	Falconwood & Welling Ward	Longlands Ward	Northumberland Heath Ward
Continue to live in current home with support when needed	74.9	76.4	57.2	78.5	83.5	68.1
Buying a property in the open market	28.3	21.3	26.4	19.3	18.9	37.2
Rent a property from a private landlord	0.0	0.9	3.1	0.0	0.0	0.0
Rent from HA	3.1	3.5	22.3	1.4	8.9	17.3
Sheltered Accommodation - Renting from HA	10.1	12.0	24.5	8.2	14.2	19.8
Sheltered Accommodation - Renting from Private Landlord	1.0	0.9	1.8	1.4	1.1	0.3
Sheltered Accommodation - Buying	18.4	16.5	18.2	21.2	21.4	6.9
Sheltered Accommodation - Shared Ownership	1.9	2.1	1.0	1.8	3.1	9.7
Extra Care Housing - Renting from HA	2.9	6.8	22.3	1.4	7.1	9.1
Extra Care Housing - Renting from Private Landlord	1.0	0.9	1.0	0.0	1.1	0.0
Extra Care Housing - Buying	16.5	7.6	13.5	15.3	17.1	1.5
Extra Care Housing - Shared Ownership	1.9	0.0	0.0	0.0	2.0	0.0
Residential Care Home	4.8	1.7	2.2	11.4	14.6	0.9
Co-housing	8.8	2.1	4.7	3.2	1.7	0.5
Go to live with children or other relatives	1.9	4.3	0.0	4.9	3.1	0.3
Other	5.6	5.2	1.0	3.6	2.2	0.0
Base (households responding)	1,768	1,919	1,157	1,744	1,097	739

Source: 2018 Household Survey

**Table 6.3 Older person housing options being considered (%) continued**

Older persons option	Ward					
	Sidcup Ward	Slade Green & Northend Ward	St Mary's & St James Ward	Thamesmead East Ward	West Heath Ward	Borough Total
Continue to live in current home with support when needed	56.5	59.5	61.7	32.8	73.4	71.5
Buying a property in the open market	20.9	12.2	24.2	32.9	24.8	22.1
Rent a property from a private landlord	3.7	2.2	2.8	0.0	0.8	1.3
Rent from HA	4.5	20.8	16.3	28.3	5.5	8.2
Sheltered Accommodation - Renting from HA	18.4	33.8	24.0	25.8	3.8	14.4
Sheltered Accommodation - Renting from Private Landlord	0.0	2.2	6.3	0.0	0.8	1.8
Sheltered Accommodation - Buying	6.5	5.1	18.2	5.0	21.8	15.9
Sheltered Accommodation - Shared Ownership	1.1	5.8	1.3	0.5	1.6	2.2
Extra Care Housing - Renting from HA	11.6	17.9	18.1	15.7	1.9	9.5
Extra Care Housing - Renting from Private Landlord	0.5	2.2	2.8	0.0	0.0	0.9
Extra Care Housing - Buying	4.9	3.7	17.9	5.4	14.9	12.0
Extra Care Housing - Shared Ownership	0.0	2.2	3.0	0.5	0.8	1.5
Residential Care Home	2.6	3.6	4.4	0.3	5.1	6.5
Co-housing	3.2	5.8	12.5	1.7	9.3	5.3
Go to live with children or other relatives	2.6	4.5	8.7	0.7	11.4	4.8
Other	3.7	3.7	2.6	5.0	0.8	2.8
Base (households responding)	1,552	1,113	1,056	1,201	1,589	24,843

Source: 2018 Household Survey

**Table 6.4 Older person housing options being considered (number)**

Older persons option	Ward					
	Barnehurst Ward	Belvedere Ward	Bexleyheath Ward	Blackfen & Lamorbey Ward	Blendon & Penhill Ward	Crayford Ward
Continue to live in current home with support when needed	898	1,364	1,661	1,249	1,231	1,371
Buying a property in the open market	236	304	460	326	275	357
Rent a property from a private landlord	0	28	19	15	74	0
Rent from HA	59	173	19	31	112	109
Sheltered Accommodation - Renting from HA	52	365	275	124	103	231
Sheltered Accommodation - Renting from Private Landlord	12	52	56	0	85	41
Sheltered Accommodation - Buying	133	208	397	328	414	195
Sheltered Accommodation - Shared Ownership	12	0	93	31	14	55
Extra Care Housing - Renting from HA	82	240	219	108	110	203
Extra Care Housing - Renting from Private Landlord	12	52	19	0	25	0
Extra Care Housing - Buying	156	56	428	272	308	98
Extra Care Housing - Shared Ownership	0	0	93	62	27	55
Residential Care Home	72	112	304	164	174	74
Co-housing	58	0	221	155	27	104
Go to live with children or other relatives	111	145	137	71	12	98
Other	37	0	56	71	14	19
Base (households responding)	1,088	1,784	2,003	1,581	1,537	1,917

Source: 2018 Household Survey

**Table 6.4 Older person housing options being considered (number) continued**

Older persons option	Ward					
	Crook Log Ward	East Wickham Ward	Erith Ward	Falconwood & Welling Ward	Longlands Ward	Northumberland Heath Ward
Continue to live in current home with support when needed	1,325	1,467	662	1,369	916	503
Buying a property in the open market	501	409	305	337	207	275
Rent a property from a private landlord	0	18	36	0	0	0
Rent from HA	55	68	258	24	98	128
Sheltered Accommodation - Renting from HA	178	231	284	143	156	146
Sheltered Accommodation - Renting from Private Landlord	17	18	21	24	12	2
Sheltered Accommodation - Buying	326	316	210	370	235	51
Sheltered Accommodation - Shared Ownership	34	40	12	31	34	72
Extra Care Housing - Renting from HA	52	131	258	24	78	67
Extra Care Housing - Renting from Private Landlord	17	18	12	0	12	0
Extra Care Housing - Buying	291	145	156	267	188	11
Extra Care Housing - Shared Ownership	34	0	0	0	22	0
Residential Care Home	84	32	25	198	160	7
Co-housing	156	41	54	55	19	4
Go to live with children or other relatives	34	82	0	86	34	2
Other	99	99	12	62	24	0
Base (households responding)	1,768	1,919	1,157	1,744	1,097	739

Source: 2018 Household Survey

**Table 6.4 Older person housing options being considered (number) continued**

Older persons option	Ward					Total
	Sidcup Ward	Slade Green & Northend Ward	St Mary's & St James Ward	Thamesmead East Ward	West Heath Ward	
Continue to live in current home with support when needed	877	662	652	394	1,166	17,766
Buying a property in the open market	325	136	256	395	394	5,500
Rent a property from a private landlord	58	25	30	0	13	315
Rent from HA	70	231	172	340	88	2,035
Sheltered Accommodation - Renting from HA	285	376	253	310	60	3,573
Sheltered Accommodation - Renting from Private Landlord	0	25	67	0	13	445
Sheltered Accommodation - Buying	101	57	192	60	346	3,938
Sheltered Accommodation - Shared Ownership	17	64	14	6	26	554
Extra Care Housing - Renting from HA	180	199	191	189	30	2,361
Extra Care Housing - Renting from Private Landlord	7	25	30	0	0	229
Extra Care Housing - Buying	76	41	189	65	236	2,983
Extra Care Housing - Shared Ownership	0	25	32	6	13	369
Residential Care Home	40	40	46	4	81	1,616
Co-housing	49	64	132	20	148	1,305
Go to live with children or other relatives	41	50	92	9	181	1,186
Other	57	41	27	60	13	690
Base (households responding)	1,552	1,113	1,056	1,201	1,589	24,843

Source: 2018 Household Survey

## Older persons' moving intentions

- 6.22 Of all older person households (65+ years), the 2018 Household Survey found that 9.3% would like to move in the next 5 years; 2.3% would like to move but are unable to; and 88.4% do not want to move in the next 5 years (but they would move in the longer term).
- 6.23 Of households with an HRP aged 65 and over who are unable to move, one-third (33.9%) stated they could not afford to because other properties are too expensive; one-fifth (20.7%) stated that there is a lack of suitable property of the type wanted and 13.5% stated that there is a lack of suitable property in the area wanted. 7.2% said that the need to receive support was a limiting factor, and a further 6.1% mentioned a lack of properties with the required adaptations (Table 6.5).

<b>Table 6.5 Reasons why households with an HRP aged 65 and over are unable to move</b>	
Cannot afford to (other properties too expensive)	33.9
Lack of suitable property: with adaptations needed	6.1
Lack of suitable property: in the area wanted	13.5
Lack of suitable property: of type wanted	20.7
Need to give support	1.9
Need to receive support	7.2
Employment	0.5
Economic uncertainty	3.4
Other reasons	12.8
<i>Base (households responding)</i>	623

Source: 2018 Household Survey

- 6.24 Of households with an HRP aged 65 and over and planning to move, the Household Survey found that the main reasons for moving were health problems and/or needing housing suitable for an older or disabled person, mentioned by 30.9% of these respondents. A further 10.8% said that they need a smaller property as their current property is too difficult to manage and 15.2% said that they need a smaller property for other reasons.
- 6.25 Table 6.6 considers the future housing choices being considered by older households within the next 5 years by reference to their current number of bedrooms and the number of bedrooms aspired towards and expected to move to. Most households expect to either downsize or stay in the same-sized property, although higher proportions (56.7%) expect to move to a smaller property.



<b>Housing choice</b>	<b>Aspiration (%)</b>	<b>Expectation (%)</b>
Downsizing (moving to a smaller property)	46.8	56.7
Staying same	45.4	38.9
Upsizing (moving to larger property)	7.8	4.4
<b>Total</b>	<b>100.0</b>	<b>100.0</b>
Base (households responding)	1404	1224

Source: 2018 Household Survey

## Future need for specialist older person accommodation and residential care institutions

6.26 Table 6.7 sets out the categories of specialist older person accommodation as shown on the Elderly Accommodation Counsel (EAC) website (source: [www.housingcare.org](http://www.housingcare.org) ) and Council information.

Category	Number of units	Description
Age-exclusive housing	201	Schemes or developments that cater exclusively for older people, usually incorporate design features helpful to older people, and may have communal facilities such as a residents' lounge, guest suite and shared garden, but do not provide any regular on-site support to residents.
Care homes	515	A residential setting where a number of older people live, usually in single rooms, and have access to on-site care services. Since April 2002 all homes in England, Scotland and Wales are known as 'care homes', but are registered to provide different levels of care. A home registered simply as a <b>care home</b> will provide personal care only - help with washing, dressing and giving medication.
Care home with nursing	671	A home registered as a <b>care home with nursing</b> will provide the same personal care but also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention from a nurse.
Enhanced sheltered/close case	0	Sheltered housing that provides more in facilities and services than traditional sheltered housing but does not offer the full range of provision that is found in an Extra Care housing scheme.
Retirement housing	993	Housing developments of a similar type to sheltered housing (see below), but built for sale, usually on a leasehold basis.
Extra Care housing	120	Extra Care Housing is housing designed with the needs of frailer older people in mind and with varying levels of care and support available on site. People who live in Extra Care Housing have their own self-contained homes, their own front doors and a legal right to occupy the property. Extra Care Housing is also known as very sheltered housing, assisted living, or simply as 'housing with care'. It comes in many built forms, including blocks of flats, bungalow estates and retirement villages. It is a popular choice among older people because it can sometimes provide an alternative to a care home.
Sheltered housing	1,174	Sheltered housing means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors.
Total	3,674	

Source: EAC database [www.housingcare.org](http://www.housingcare.org); Council lists of accommodation

- 6.27 Across the Borough, there are around 3,674 units of specialist older persons accommodation. This includes 1,186 units of residential care (C2) dwellings.
- 6.28 Analysis would indicate that 36.8% of specialist older person provision including sheltered housing is owned by registered providers and 63.2% by private organisations and charities.
- 6.29 Table 6.8 considers the ratio of older people to current provision and then applies this ratio to future household projections. This results in the need for 928 additional specialist older persons accommodation (C3) and 448 additional units of residential care provision (C2) over the plan period to 2038.

<b>Current provision (and planning use class)</b>	<b>Number of units 2018</b>	<b>Number aged 75 and over 2018</b>	<b>Number aged 75 and over 2038 (projected)</b>	<b>Change in need</b>
		<b>20,060</b>	<b>27,637</b>	
		<b>Ratio of population to provision</b>	<b>Ratio applied to 2038 population</b>	
Specialist older person(C3)	2,488	0.124027916	3,428	940
Residential Care (C2)	1,186	0.059122632	1,634	448
<b>Total</b>	<b>3,674</b>		<b>5,062</b>	<b>1,388</b>

- 6.30 Regarding current and future need for older person's accommodation, in-depth interviews (June 2018) with Adult Social Care Commissioners indicated that:
- Bexley does not have an Extra Care housing (ECH) offer for those requiring accommodation with care available 24/7;
  - Bexley has the third highest rate of people aged 65 and over in London (17% of Bexley's total population), and those aged 85 and over make up 2% of the total population (source: ONS Mid-year population estimates 2015). The population of Bexley is also ageing faster than the rest of London – there was a 10% increase in the population aged over 65 years from 2003-2012. By 2030, there is predicted to be a 32% increase in people aged over 65. The largest percentage change will be in the "oldest" older people – a 25% increase in those aged 90 and over by 2020, and a 95% increase by 2030.
  - The higher populations of older people living alone are found in the south of the Borough, in particular the south east. However, over a quarter of older people residents registered on the housing register live in Erith, north of the Borough.
  - In terms of demand, officers stated that people aged 65 and over make up the majority of the Bexley Adult Social Care client group (64% in 2015/16). A significant proportion of clients are aged 85 and over (30%) (source: LB Bexley SALT return 2015-16).

- Officers have issued a brief to registered providers for schemes of not less than 60 units with a dependency mix of one third low dependency, one third moderate dependency and one third high dependency. Tenure mix (market sale, market rents, and affordable rents) is to be determined by need and scheme by scheme economic viability.
- Registered providers expressed enthusiasm and a commitment to pursue these further. The existence of the London Mayor’s Care and Support Specialised Housing Fund is acknowledged.
- Officers recommended that the development of Extra Care Housing become a formal strategy sitting as part of the Corporate Plan delivery plan and that officers are authorised to pursue arrangements with registered providers to bring forward plans for schemes over the next 5 years, subject to capital allocations and all of the usual permissions and authorisations;
- Older people living in under-occupied housing stock because their only other option is residential or nursing care – variety and alternative accommodation is desperately needed.

### Senior cohousing communities

- 6.31 Senior cohousing is specifically mentioned in PPG as a housing option for older people: ‘Senior cohousing communities are created and run by residents, based on the intention to live with a group of people of a similar age. The sites often consist of self-contained private homes as well as shared community space. Some communities offer an additional option for informal care.
- 6.32 This option should be considered by the Council as part of a diverse range of accommodation for older people.

### People with dementia and early onset dementia

- 6.33 The PPG makes specific reference to dementia and that **‘there should be a range of housing options and tenures available to people with dementia, including mainstream and specialist housing. Innovative and diverse housing models should be considered where appropriate’** (source: PPG Paragraph: 019 Reference ID: 63-019-20190626).
- 6.34 The PPG also outlines the characteristics of a dementia- friendly communities:
- easy to navigate physical environment;
  - appropriate transport;
  - communities shaped around the views of people with dementia and their carers;
  - good orientation and familiarity;
  - reduction in unnecessary clutter; and
  - reduction in disorienting visual and auditory stimuli.
- 6.35 2020 POPPI/PANSI data estimates there are 78 people with early onset dementia and 3,628 people aged 65 and over with dementia (Table 6.9). By

2038, the number of people aged 65 and over with dementia is projected to increase by 37.6%, with an increase of 45.7% amongst the 85+ age group. The number with early onset dementia is expected to increase slightly.

<b>Dementia</b>	<b>2020</b>	<b>2038</b>	<b>% Change 2020-2038</b>
Early onset dementia (30-64)	78	88	12.3%
Dementia (65-74)	726	936	28.9%
Dementia (75-84)	1,479	1,984	34.1%
Dementia (85 and over)	1,423	2,073	45.7%
Dementia (total 65+)	3,628	4,992	37.6%

Source: POPPI/PANSI and ONS population projections

A report by the All Party Parliamentary Group (APPT) on Housing and Care for Older People published a report on Housing for People with Dementia in July 2021

[https://www.housinglin.org.uk/\\_assets/Resources/Housing/Support\\_materials/Reports/HCOP\\_APPG\\_Dementia\\_Housing\\_and\\_Care\\_Inquiry-LowRes.pdf](https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Reports/HCOP_APPG_Dementia_Housing_and_Care_Inquiry-LowRes.pdf)

6.36 This set out 23 recommendations which included:

- Recognise potential future loneliness and how we can maintain our family connections and wider social networks in the communities we live in before or after diagnosis.
- Consider whether to move whilst we are able: rightsizing and moving to the right place and environment whilst able to still develop new routes and make new friends.
- Make preventive changes, incrementally, to the home environment; such as when upgrading property or installing new technology, or where we require additional personal care and support to help us to live independently.

6.37 Regarding housing and planning, the report recommended:

- Support increased provision of Extra Care housing / assisted living accommodation and retirement housing that is dementia-ready, with top-sliced grant-aid through Homes England.
- Strengthen MHCLG guidance to local planning authorities. LPAs should respond to demographic change and the need for more homes designed for older people, including those with dementia, through Local Plans specifying requirements for age-friendly housing.

### The role of general housing and in particular bungalows and homes that can be adapted to meet a change in needs

6.38 The profile of dwellings occupied by households aged 65 and over by age group based on 2018 household survey data is show in Table 6.10. This shows

that the majority (65.4%) live in houses, particularly those with 3 or more bedrooms; 12.8% live in bungalows, 21% in flats and 0.8% in other dwelling types. The table also shows the dwelling type and size aspirations and expectations of older people planning to move in the next 5 years. Given the anticipated increase in older person households, it is important that the Council recognises the impact this will have on the range of dwelling types and sizes being developed over the plan period.

	<b>Current Dwelling (%)</b>	<b>Aspiration (%)</b>	<b>Expectation (%)</b>
1/2 Bed House	9.7	9.0	11.0
3 Bed House	42.1	11.2	13.6
4 or more Bed House	13.6	1.9	1.6
1/2 Bed Flat	20.6	27.7	15.8
3+ Bed Flat	0.4	0.8	0.0
1/2 Bed Bungalow	8.9	21.3	20.6
3+ Bed Bungalow	3.9	18.5	7.9
Other	0.8	9.6	29.5
TOTAL	100.0	100.0	100.0
Base	19,961	1,355	1,058

Source: 2018 Household Survey

- 6.39 The provision of appropriate adaptations to existing dwelling stock can help people lead independent lives. PPG also asks councils to consider the extent to which existing dwelling stock can help meet the needs of older people (source: PPG 2019 Paragraph: 017 Reference ID: 2a-017-20190220).
- 6.40 The 2018 Household Survey found that overall 5.4% of all properties across the Borough have been adapted or purpose built for a person with a long-term illness, health problem or disability. 5.6% of households said they require care or support to enable them to stay in their current home. 58.1% of households stated that there is sufficient space for a carer to stay overnight if this was needed.
- 6.41 Table 6.11 summarises this data by ward and highlights areas with high levels of adaptation and high levels of need for care/support. It also highlights areas where there are lower levels of space available for a carer to stay overnight. In terms of adaptations, these are most prevalent in Slade Green & Northend Ward (10.8% of households), Belvedere (9.1%) and Bexleyheath (8.7%). Interestingly, it is Slade Green & Northend Ward (9.6%) where the highest levels of care/support to enable household members to stay at their home were also reported. By comparison, households living in Slade Green & Northend, Erith and Thamesmead East Wards typically have lower than average proportions of dwellings with sufficient space for a carer to stay overnight.

**Table 6.11 Adaptations, support requirements and space for carer to stay by local analysis area**

Ward	Current home has been adapted or purpose-built for a person with a long-term illness, health problem or disability (%)	You or other members of your household require care or support to enable you/them to stay in this home (%)	Sufficient space in your home for a carer to stay overnight, if this was needed, is available (%)
Barnehurst	6.7%	7.0%	61.8%
Belvedere	9.1%	7.0%	58.9%
Bexleyheath	8.7%	7.2%	62.1%
Blackfen & Lamorbey	4.0%	3.9%	61.8%
Blendon & Penhill	3.9%	8.8%	64.2%
Crayford	5.6%	3.4%	54.8%
Crook Log	2.4%	5.1%	71.0%
East Wickham	6.8%	5.5%	55.2%
Erith	6.0%	4.9%	41.4%
Falconwood & Welling	2.1%	3.2%	57.2%
Longlands	3.8%	5.9%	61.5%
Northumberland Heath	5.3%	6.5%	59.0%
Sidcup	4.5%	6.9%	63.3%
Slade Green & Northend	10.8%	9.6%	40.8%
St Mary's & St James	4.2%	3.7%	66.0%
Thamesmead East	4.2%	3.2%	36.5%
West Heath	4.5%	4.5%	64.1%
<b>Borough Total</b>	<b>5.4%</b>	<b>5.6%</b>	<b>58.1%</b>

Source: 2018 Household Survey

### Estimating future need for adaptations and home improvement

6.42 The 2018 Household Survey asked whether adaptations were required by households (Table 6.12). This takes account of the PPG which asks Councils to consider the extent to which existing dwelling stock can help meet the needs of older people. When asked about adaptations and home improvements required in the home, households aged 65+ years generally stated a need for adaptations related to mobility issues. These include adaptations to bathrooms (15.6% of 60-84 HRP households and 16.6% 85+ households), internal handrails (11.5% 60-84 and 14.9% 85+), external handrails (8.8% 60-84 and 16.1% 85+) and stairlifts (16.3% 85+). By comparison, younger households (HRP under 60 years) most frequently mentioned home improvements such as double glazing (15.4%), more insulation (16.3%) and better heating (14.3%).

**Table 6.12 Adaptations and home improvements required either now or in next 5 years by age group**

Adaptation/improvement required	Age group (% of households)			Total
	Under 60 years	60-84 years	85+	
<b>Home improvement</b>				
More insulation	16.3	11.6	4.8	14.5
Better heating	14.3	12.8	7.2	13.6
Double glazing	15.4	9.9	4.6	13.3
Adaptations to bathroom	6.5	15.6	16.6	9.7
Increase the size of property	13.2	3.0	1.0	9.7
Security alarm	10.7	7.0	11.0	9.6
Sound proofing	8.6	4.7	1.8	7.2
Improved ventilation	8.5	4.6	1.6	7.1
Community alarm service	2.5	7.0	20.4	4.4
<b>Adaptations</b>				
Internal handrails	3.6	11.5	14.9	6.4
Adaptations to kitchen	6.2	5.8	4.3	6.1
Downstairs WC	4.7	7.7	10.0	5.8
Stair lift / vertical lift	2.4	9.9	16.3	5.1
External handrails	2.8	8.8	16.1	5.1
Improvements to access	2.7	5.3	3.8	3.6
Wheelchair adaptations	2.3	5.3	6.5	3.3
Room for a carer	2.4	2.7	4.9	2.5
Level door handles	2.1	3.0	3.3	2.4
Base (all households)	60820	29133	2491	92444

Source: 2018 Household Survey

- 6.43 Resources for aids and adaptations remain limited, particularly for households in the private sector (owner occupation or privately rented accommodation). However, as mentioned above in respect of support requirements, the provision of appropriate adaptations is essential to older households in maintaining independent living. Alternative sources of funding, such as equity loans, could be considered to finance remedial measures required by older person households. It should be pointed out that whilst local authorities will assess anyone's needs, assistance is means tested and many will self-fund.
- 6.44 As a preventative measure, the London Plan requires housebuilders to build a proportion of new homes to defined access standards.

### Assistance in the home

- 6.45 The range of assistance required from all households including older person households by 60-84 and 85+ age groups is explored in Table 6.13. The level of assistance required increases with age group and the majority of 85+ households require help with repair and maintenance, gardening, cleaning the home and other practical tasks.



**Table 6.13** Type of assistance required either now or in next five years by age group

	Under 60	60-84	85+	All households
Help with repair and maintenance of home	18.3	42.5	57.4	27.0
Help with gardening	9.3	35.4	69.0	19.1
Help with cleaning home	7.2	24.7	60.5	14.2
Help with other practical tasks	6.0	23.1	52.7	12.6
Help with personal care	6.2	14.8	36.5	9.7
Want company / friendship	7.0	11.5	23.6	8.9
Base (All households)	60820	29133	2491	92444

Source: 2018 Household Survey

- 6.46 Given the high proportion of older households who want to continue living in their own home (Table 6.13 and associated discussion), the provision of home-based assistance, support and care is an increasingly important issue in the meeting of housing needs for older people. The key challenge for local authorities is the funding of services for growing numbers of older people.

### Health-related housing need

- 6.47 A range of sources can be drawn upon to establish the overall scale of disability/support needs across the Borough of Bexley. In summary:
- The 2011 Census reported that across the Borough 83% were in very good or good health, 12.4% were in fair health and 4.7% in bad/very bad health (particularly across older age groups). Long term health problems are summarised in Table 6.14. A total of 39,350 residents (17%) were in fair/bad/very bad health which compares with 18.3% across England.
  - 7.1% (16,300) of residents reported that their daily activities were limited 'a lot' and 8.6% (19,800) 'a little' which compares with 8.3% and 9.3% respectively across England. This is mainly associated with older age groups.
  - 7,070 people received Disability Living Allowance in 2018 or 2.9% of the population.
  - The ONS Family Resources Survey 2016/17 estimates that around 20.4% of the population nationally has a disability. This translates to around 50,500 people across Bexley in 2021 and is projected to increase to around 63,065 by 2038.

**Table 6.14** Long-term health problem or disability

Age Group	Measure of health (%)		
	Very good or good health (%)	Fair health (%)	Bad or very bad health (%)
Age 0 to 15	97.2	2.2	0.6
Age 16 to 24	95.4	3.6	1.0

Age 25 to 34	93.2	5.3	1.5
Age 35 to 49	87.5	9.2	3.3
Age 50 to 64	74.4	18.3	7.3
Age 65 to 74	59.6	29.9	10.5
Age 75 to 84	43.9	40.0	16.1
Age 85 and over	30.5	45.4	24.1
All categories: Age	83.0	12.4	4.7
Total by measure of health	191,553	28,545	10,804

Source: 2011 Census Table DC3302EW

### Physical disability

- 6.48 POPPI and PANSI (Projecting Older People Population Information/Projecting Adult Needs and Service Information, Oxford Brookes University/Institute of Public Care) provides data on the likely prevalence in 2020 of a range of physical disabilities and how this is expected to change by 2038 (Table 6.15). In 2020, there were an estimated 16,201 people with mobility issues across all age groups which is projected to increase to 19,493 by 2038 mainly due to an increase in the number of people aged 65 with mobility issues.

<b>Table 6.15 Physical disability prevalence</b>			
<b>Disability (age group)</b>	<b>2020</b>	<b>2038</b>	<b>% change 2020-2038</b>
Impaired mobility (18-64)	8,145	8,710	6.9%
Mobility (unable to manage at least one activity on own) (65+)	8,056	10,783	33.8%
Moderate or serious personal care disability (18-64)	7,181	7,704	7.3%
Serious visual impairment (18-64)	98	103	4.8%
Moderate or severe visual impairment (65+)	3,701	4,872	31.6%
Severe hearing loss (18-64)	891	946	6.2%
Severe hearing loss (65+)	3,565	4,795	34.5%
All with mobility issues (impaired mobility 18-64 and mobility 65+)	16,201	19,493	20.3%

Source: POPPI/PANSI and 2018-based ONS population projections

#### 6.49 General comments from Adult Social Care interviews:

- Bexley no longer place adults with a physical disability in a residential home or supported living. This is key because the preference is for people to live in their own home in the community with adaptations, assistive technology and social care support if needed. Requirements are therefore:
  - Wide doors; and
  - Wheelchair access.
- Ground floor accommodation is preferred or an easy access lift and accessible building with no steps;
- Older clients with physical disabilities do live in residential homes out of the area. They do know the number of people but none are expected to return to Bexley at the moment;
- There is one under 65 unit with 12 beds – Peter Gidney Unit – which is on the border of the Borough and supports people with physical disabilities and mental health and or substance misuse, an example given was supporting someone with Huntington’s Disease. It provides specialist support to people from Bexley;
- The usual route for people with a physical disability into services is for the individual to approach Bexley and tell them what they want;
- There are sometimes barriers regarding care and support for older people with a physical disability for example someone experiencing a stroke. The offer would be for personal care and preventative support regarding isolation;
- There is a physical disability day service which is under review. This tends to support people in the middle age bracket through to older age. This mainly provides a social outlet for individuals attending and relieves social isolation. Transport is provided by Bexley to attend. Bexley want to know what support younger people want;

- Age UK have a group providing get togethers for friends.
- 6.50 Regarding specific accommodation needs we were told that what is needed is:
- An affordable version of a ‘McCarthy and Stone’ property in the town centres; and
  - Affordable Extra Care for older people.

### People with sensory impairments

- 6.51 According to the Department of Health, there were 25 partially sighted and 35 blind residents in Bexley in 2014. In addition, there were 50 blind people with additional needs (15 physical disability, 10 deaf with speech and 20 hard of hearing). There were also 60 partially sighted people with additional needs (30 physical disability and 20 hard of hearing).
- 6.52 In addition, there were 50 blind people with additional needs (15 physical disability, 10 deaf with speech and 20 hard of hearing). There were also 60 partially sighted people with additional needs (30 physical disability and 20 hard of hearing).
- 6.53 A total of 180 residents receive Disability Living Allowance due to blindness.
- 6.54 According to the Department of Health, there were 1,365 people registered as deaf or hard of hearing in Bexley in 2010 (latest available data). The age profile is set out in Table 6.16.

Table 6.16 Residents who are registered as deaf and hard of hearing					
	0-17	18-64	65-74	75 and over	Total
People registered as deaf by age group	20	145	35	30	230
People registered as hard of hearing by age group	15	150	115	855	1,335

Source: Department of Health

### Learning disability and autism

The number of people across all age groups with moderate or severe learning disabilities is estimated to be around 953 in 2020 rising to 1,027 by 2038 (Table 6.17). There is a notable growth in the number of people aged 65 and over with learning disabilities. Around 1,845 people have autistic spectrum disorders in 2020 and this is expected to increase to 2,028 by 2038.

Table 6.17 Learning disability and autism			
Learning disability (age group)	2020	2038	% change 2020-2038
Total (18-64)	3,675	3,847	4.7%
Total (65+)	856	1,127	31.6%
Moderate or severe (18-64)	840	879	4.7%
Moderate or severe (65+)	113	148	30.8%

Moderate or severe (all ages)	953	1,027	7.8%
People with LD living with a parent (18-64)	307	316	2.9%
Downs syndrome (18+)	95	100	5.1%
Challenging behaviour (18-64)	68	71	4.9%
Autistic spectrum disorders (18-64)	1,476	1,547	4.8%
Autistic spectrum disorders (65+)	369	481	30.4%

Source: POPPI/PANSI

6.55 General comments from Adult Social Care interviews:

- High proportions of people in this group live with their families and may not have accommodation needs associated with their disability.

6.56 Regarding current accommodation provision:

- there are 102 out of Borough residential placements. For some clients this is appropriate, to be close to family members or established social networks, however the aim of Bexley's strategy is to repatriate where possible to a supported living unit within Bexley;
- to enable independent living within the Borough, 7 residential units are under block contract with the Council. There are a further 3 homes run by private organisations; and
- currently 12 flats are being commissioned for people with LD/autism/challenging behaviour in the north of Bexley – one would be for a specific individual, one would be a step-up service/crash pad. 6-8 would be for people in out of area placements and the remaining would be for young people in transition, leaving care or residential schools.

6.57 Specific accommodation needs:

- regarding young people it is estimated that 8-11 clients will need accommodation and care each year until 2020.
- there are 51 people currently living with ageing parents all in need of accommodation in the near future. This is believed to be an under-estimate. Preferences are divided between independent and shared living.

### The Transforming Care plan

6.58 Transforming Care is seeking to reduce the number of people with learning disabilities and autism needing to go into hospital for their care. Consultants worked with Bexley and neighbouring authorities to contribute to a joint transforming care housing strategy. 3 groups of people were identified:

- Group 1 – the traditional Transforming Care cohort – people in long stay hospitals or ATUs;
- Group 2 – people who have a mild learning disability and autism, with two-thirds of the group living at home;
- Group 3 – children in transition aged 13-18 who can be used to predict future need, as they are easily identifiable from children's data, respite costs for example are often known.

6.59 The scale of need in Bexley was estimated as:

- Group 1: one person in long term in-patient care. They also identified one out of area placement needed for a man whose placement is unsuitable, but they need a bespoke housing and care solution.
- Group 2: mainly unknown due to lack of historic data (recently 4 people were unknown to services and had a relatively short in-patient stay but needs may have been educational rather than housing).
- Group 3: between two and four children per year group would come through at aged 18 needing housing. Young people are leaving home earlier and so one of their recommendations is to build a small number of units every one to two years to start to reach a balance after a number of years of building.

6.60 Consultants recommended:

- policy changes regarding housing allocation and direct lettings routes and systems as people with needs around autism will not get allocated a property via choice based lettings; and
- social care commissioners attend housing panels.

#### People with behaviors which challenge

6.61 Since February 2018, officers report between 3 and 7 inpatients at any one time. These clients when well enough for discharge will return to original placement, home or require a placement to be sourced.

6.62 To ensure that there is a local offer for these clients, commissioners are at the planning permission stage to build 10 apartments on the Hainault site and NHSE is contributing to the building costs.

6.63 The Council has an at risk register for these clients. For LD/MH we currently have 15 clients.

#### People with complex needs

6.64 Adult Social Care Commissioners report that this involves very complex cases often involving a discharge from rehabilitation or hospital and continuing health care. There is a need for flexible housing in the short term when patients are discharged whilst longer term accommodation can be found. The service strives to prevent young people going out of Borough for education and housing preferably in a community setting rather than an institution. The team is focusing on the needs of people with physical disability and reigning back on out of Borough placements for all groups. Specific information about the levels of needs for supported and Extra Care housing are presented by client group, rather than here to avoid double counting.

#### Mental health

6.65 2020 POPPI/PANSI data estimates there are around 28,724 residents with a common mental health disorder (Table 6.18). The number of people aged 18-64 with a common mental health disorder is expected to increase over the

period to 2038. Depression amongst people aged 65 or over is expected to increase considerably.

<b>Table 6.18 Mental health prevalence</b>			
<b>Mental health 18-64</b>	<b>2020</b>	<b>2038</b>	<b>% change 2020-2038</b>
Common mental disorder	28,724	30,109	4.8%
Borderline personality disorder	3,646	3,822	4.8%
Antisocial personality disorder	4,990	5,231	4.8%
Psychotic disorder	1,057	1,108	4.8%
Psychotic disorders (2 or more)	10,885	11,410	4.8%
<b>Older people with depression</b>	<b>2020</b>	<b>2038</b>	<b>% change 2020-2038</b>
Depression 65+	3,582	4,719	32%
Severe depression (65+)	1,137	1,507	33%

Source: POPPI/PANSI

6.66 Key information from in-depth interviews with relevant Council officers is now presented:

- many people with mental health problems are living in the community with family carers and were below the radar of housing and/or social care in Bexley.
- known cases are evidenced in the Quality and Outcomes Framework QOF register which is maintained by primary care services (data presented above).
- whilst service providers exist in Bexley and provide outreach, residential support or care and support, the aspiration is to develop more supported housing and therefore there would need to be an increase in the workforce able to support people in the community with complex mental health problems to enable this to happen.
- out of Borough placements number around 45-46 people who have a wide range of need. They are all section 117 placements with aftercare funding ('After-care' means the help you get when you leave hospital. You are entitled to section 117 after-care if you have been in hospital under section 3, 37, 45A, 47 or 48 of the Mental Health Act 1983. Section 117 means that you will get free after-care when you leave hospital.). Some of these people are borderline nursing care as they are older. Some need to move into their own tenancy and a small number of these people will require high secure accommodation and support for life.
- there are more people with mental health problems living in the north of the Borough.

#### Specific accommodation needs

6.67 Regarding supply, the Insight team told us that there are:

- 50 residential or supported living placements funded by health, either wholly or in most cases jointly with the local authority under s117 (majority placed outside of Bexley);
  - 5 rehab patients at Barefoot Lodge (Oxleas);
  - 18 short term (<24 month) rehab placements at Chapel Hill (MCCH);
  - 17 in satellite housing supported by MCCH (including 5 with ASD diagnosis at Glynde Road); and
  - 35 individuals receiving intensive housing support through Oxleas (CMHRES).
- 6.68 In summary, therefore, that is 125 individuals receiving some level of housing / rehab support. There may be a few others with ‘mental ill health’ known to LBB but not having met thresholds for health funding.
- 6.69 The Insight team also told us that there is a need for more affordable 1-bedroom supported living dwelling and that around 50 people require longer term supported living accommodation.
- 6.70 There were thought to be currently 6-8 patients in acute care awaiting accommodation.
- 6.71 There is a need for more supported housing provision, particularly in the north of the Borough, comprising individual units, bungalows and flats so people can live as part of their community with 24/7 support and in some cases a warden.
- 6.72 The potential to re-purpose existing supported housing is now being realised.

#### Mental health/drug and alcohol abuse service users’ consultation event

- 6.73 The following problems and solutions were suggested at a consultation event covering all of the above groups.

Problem	Solution
Navigating complex council housing systems to get social housing or supported housing – people have struggled to make the system work for them and remain ‘homeless’	Housing and Support ‘Navigators’ guide people through the system (including benefits) A simple clear pathway and simple systems
Lack of supported housing/housing for social rent to move into after rehab	Keyring or similar housing scheme with support and outreach
Lack of preventative and sustainable support services (ongoing)	More commissioning of support via existing providers who currently struggle to meet need
Not enough mental health crisis beds and rehab hospital beds	
Not enough in area supported housing and step down from hospital housing	



Not enough specialised housing e.g. for people with autism	Commission specialist housing to meet needs
Lack of appointees to help people manage their direct payment budget	

### Accessible and wheelchair standard housing

6.74 The 2018 Household Survey indicates that 5.4% of households live in properties that have been adapted or purpose built for those with an illness/disability. Analysis of demographic data would suggest that the number of adapted properties will need to increase by 1,930 over the period 2018 to 2038. This figure has been derived from data on the number of households with adaptations by age group of the Household Reference Person; how the number of households by HRP age group is expected to change; and applying the proportion of adapted properties to future household numbers by age group.

6.75 PPG states that **‘where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the NPPF). To help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:**

- **M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement);**
- **M4(2) Category 2: Accessible and adaptable dwellings; and**
- **M4(3) Category 3: Wheelchair user dwellings**

**‘Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors ’** (source: PPG June 2019 Paragraph: 009 Reference ID: 63-009-20190626)

- **M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement);**
- **M4(2) Category 2: Accessible and adaptable dwellings; and**
- **M4(3) Category 3: Wheelchair user dwellings**

**‘Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors ’** (source: PPG Paragraphs: 008 Reference ID: 56-008-20160519 & 009 Reference ID: 56-009-20150327).

6.76 Regarding evidencing the need for accessible housing, PPG states:

**‘Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to**

**approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:**

- **the likely future need for housing for older and disabled people (including wheelchair user dwellings).**
- **size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).**
- **the accessibility and adaptability of existing housing stock.**
- **how needs vary across different housing tenures.**
- **the overall impact on viability.’** (source: Para: 007 Reference ID: 56-007-20150327).

6.77 Optional accessibility standards for dwellings were introduced by the government in 2015 to provide a mechanism for improving accessibility of housing for those with additional needs. National standards have been established and contained within Part M Volume 1 of the Building Regulations source:

[https://www.planningportal.co.uk/info/200135/approved\\_documents/80/part\\_m\\_-\\_access\\_to\\_and\\_use\\_of\\_buildings](https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings) as set out in Table 6.19. Only one accessible housing standard can apply to any dwelling. The M4(2) accessible and adaptable dwelling standard is based on, and in 2015 effectively replaced, the ‘Lifetime Homes’ standard.

**Table 6.19 Summary of accessible housing standards**

<b>Standard Label</b>	<b>Standard title</b>	<b>Level of accessibility provided</b>	<b>Mandatory or optional</b>
M4(1)	Visitable dwellings	Level access not necessarily provided into the dwellings – few accessibility features	Mandatory
M4(2)	Accessible and adaptable dwellings	Level access is provided into the dwelling – easy to adapt to make more accessible – not suitable for most wheelchair users	Optional
M4(3)	Wheelchair user dwellings	Dwellings suitable for wheelchair users: either wheelchair adaptable (a) or wheelchair accessible (b)	Optional

6.78 It should be noted that Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings (source: PPG Paragraph: 009 Reference ID: 56-009-20150327).

6.79 In order to establish an appropriate target for M4(3) dwellings, Table 6.20 sets out a series of assumptions regarding wheelchair use from the English Housing Survey and a report by Aspire Housing Association. Applying these

assumptions would suggest a target of around 5% of newbuild to meet M4(3) wheelchair accessible standard is required.

- 6.80 According to PPG (source: PPG Paragraph: 009 Reference ID: 56-009-20150327), 'Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.' This would imply that the onus on wheelchair accessible housing delivery is with the local authority/registered providers, but private developers should also be encouraged to build to M4(3) wheelchair accessible or adaptable homes where appropriate. Any final targets should be set within the context of likely levels of delivery.

**Table 6.20 Wheelchair use assumptions and resulting annual need**

Assumption	% requirement	Number each year (based on net annual target of 685 new dwellings)
Wheelchair use from the English Housing Survey 2018/19 – households using wheelchair all the time	0.6%	4
Wheelchair use from the English Housing Survey 2018/19 – households using wheelchair either indoors or outdoors	3.0%	21
Wheelchair need based on survey responses which indicate 927 households need wheelchair adaptations 2018-2038	6.7%	46
Aspire report on wheelchair accessible housing (*)	10%	69
Average of indicators	5.1%	35

(\*) Wheelchair Accessible Housing: Waiting for appropriate housing in England, Aspire October 2014 recommends that the national government should set a minimum requirement of 10% of all new build properties across all tenures to be wheelchair accessible.

- 6.81 Given the ageing demographic of the Borough and the identified levels of disability amongst the population, it is recommended that a policy to provide new homes built to accessibility standards is included in the Local Plan.
- 6.82 New build housing will play a role in providing additional adapted dwellings and the Council has adopted the London Plan policy D7 Accessible Housing. This is to ensure that:
- At least 10% of dwellings (which are created via works to which Part M Volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user' dwellings.
  - All other dwellings (which are created via works to which Part M Volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 6.83 It should be noted however that any percentage requirements for accessible housing are subject to cumulative viability testing. It is also recommended that needs are monitored closely given the ageing population over the plan period.

## Life experience-related housing need

### Armed forces

- 6.84 The Borough of Bexley is a signatory to the Armed Forces Covenant which seeks to provide support in a range of areas including housing to in-service and ex-service personnel. The Government's First Homes policy identifies people connected with the Armed Forces as an eligible group for First Homes.
- 6.85 The 2018 Household Survey identified that 0.2% of households across the Borough include someone who is currently in the Armed Forces. 0.4% of

households identified as including someone who has served in the Armed Forces in the past five years.

- 6.86 0.1% of households identified as including current or ex-Armed Forces personnel with injuries that require adapted accommodation. 0.1% of households identified as including current personnel who will require temporary supported accommodation when they leave the Armed Forces.
- 6.87 The housing register currently has 30 Armed Forces applicants:
- 33% require one-bedroom properties;
  - 43.3% require two-bedroom properties;
  - 20.0% require three-bedroom properties; and
  - 3.3% require four or more-bedroom properties.

### Rehabilitation support for substance users (drugs and alcohol)

- 6.88 Data for 2016/17 obtained from Council officers indicates:

Of the **substance misuse** population in Bexley:

- 25 people or 8% are at the start of treatment with substance misuse issues with no fixed abode;
- 29 people or 9% have a housing problem; and
- 252 people or 82% have no housing issues.

Of the population with **alcohol** use issues in Bexley:

- 7 people or 3% are at the start of treatment with substance misuse issues with no fixed abode;
- 17 people or 8% have a housing problem; and
- 181 people or 87% have with no housing issues.

- 6.89 Key information from in-depth interviews with relevant Council officers is summarised as follows:

- people who use drugs and alcohol in contact with services are mainly in receipt of benefits. It is hard to find affordable accommodation so many people end up in HMOs. Some people end up in a revolving door cycle because HMO living is not conducive to rehabilitation so they end up needing further cycles of rehab or support;
- there is a 3-stage process involving patient detox, residential rehabilitation and a dry house. There is no stage 3 dry house in Bexley. A stage 3 house is a dry house often run by charitable organisations. People who wish to remain abstinent can go there for up to 2 years. They are usually a 3 or 4-bedroom house.
- there is a clear link between drugs and alcohol misuse, housing need and homelessness.

- people who have accommodation but no support, are in danger of losing their accommodation.
- it was highlighted that unless people have an associated need, for example they have children or a mental health problem they don't get support and have to find suitable accommodation in the private rented sector.

### Specific accommodation needs

6.90 More social housing is needed for people who use drugs and alcohol and more housing associations need to be willing to offer accommodation to this group of people. Specifically:

- 12 people each year would need a residential rehabilitation;
- 6 people each year (estimated) would need stage 3 accommodation;

6.91 There needs to be a team of housing support workers to help people maintain their accommodation. This could be a floating support service. Single homeless people need to have supported accommodation with wrap around support to enable them to maintain their tenancies. People need their own front door, security, one bed accommodation and support to manage their tenancy.

### Young people with support needs

#### Foster care

6.92 The Council's housing register (October 2018) has 8 people in foster care requiring affordable accommodation who mainly need one-bedroom dwellings.

### Other stakeholder views on specialist housing in Bexley

6.93 Several of the stakeholder survey respondents are directly involved in the specialist housing sector. They work with a range of client groups including: older people, people with physical disabilities, people with learning disabilities, people with mental health problems, the Transforming Care Programme (TCP) cohort (mental health with learning difficulties, MH with LD), people with substance misuse issues and care leavers. The findings of the online survey are set out in full in Appendix E, but this section sets out some of the key issues relating to specialist housing provision.

6.94 Stakeholders working in this sector were asked to provide information on the accommodation that is currently available to these client groups. The feedback included:

- some people, including those with mental health problems, can live in their own homes but cannot afford their own property so the Council is involved in arranging appropriate housing.
- people with learning disabilities, the TCP cohort (MH with LD) and physical disabilities – supported living and residential homes in the Borough, but a lack of local availability often results in people being placed out of Borough.
- people with substance misuse issues – one stakeholder noted that where service users have completed residential treatment some go on to Stage

Three housing, but there is no provision of this type of accommodation in Bexley. Another respondent stated that service users who have addiction issues do not qualify under statutory housing legislation unless they have co-existing issues; many are therefore sofa-surfing or living in accommodation that is unsuitable.

- care leavers – a lack of supported accommodation for this group locally was reported. One stakeholder stated that accommodation provision is needed for these young people post-25 when the leaving care service ends its support. Greater development of support and accommodation is needed under the JHA provision / Southwark judgement.
- 6.95 Stakeholders were asked whether they felt that there is enough accommodation for these client groups in terms of current need (next five years) and the longer term (2023-2034). One respondent felt that there was a need for further work to project need and demand. One of the stakeholders stated that more specialist accommodation and support is needed as some people have to be placed out of Borough on a temporary basis. A lack of supported living properties was reported for clients who have behaviours that challenge themselves and others. In addition, there is a cohort of ageing parent carers who will become unable to continue to provide support in the next five years, resulting in a need to plan accommodation requirements.
- 6.96 Over the longer term (2023-2034) respondents indicated the following accommodation needs:
- sheltered accommodation for those with learning disabilities;
  - properties that are adapted for physical disabilities;
  - secure tenancies;
  - very sheltered housing;
  - service-user specific accommodation;
  - accommodation for people who may present a risk to others such as MAPPA subjects or people who have a history of drug and alcohol use;
  - providers able to deal with people who may fluctuate in health and who may present a risk of deterioration.
- 6.97 Stakeholders were asked about their biggest housing stock shortages for independent living. One stakeholder reported a shortage of adapted flats and sheltered housing for people with learning disabilities (LD) with provision on-site for support. They noted that the location of stock can be a factor, as it is not preferable to move LD clients away from their existing community and support networks and their familiar transport links. Another stakeholder reported a lack of accommodation for mental health needs when combined with drug and alcohol use. A third stakeholder mentioned the availability of 'downsizer' homes for elderly residents, commenting that many would move into a smaller home in the right location if accommodation was available – freeing up larger homes for family use.

## Summary of need of accommodation for people with additional needs

- 6.98 A wealth of information has been assembled from various sources which helps to scope out the likely level of disability across the Borough's population. Although it is a challenge to quantify the precise accommodation and support requirements, the SHMA has helped to scope out where needs are arising.
- 6.99 Specific accommodation needs identified include:
- supported housing for those experiencing mental health challenges and a specific need for individual units within the community with support;
  - specialist learning disability accommodation units as currently people have to live out of the Borough;
  - accommodation for people with learning disabilities who are currently living with aged parents;
  - accommodation for young people with mental health issues leaving home, with a recommendation for a small number of units to be built each year to match need;
  - affordable Extra Care accommodation in town centres;
  - accommodation which is sensitive to the needs of those with dementia and early onset dementia;
  - support for people with drug/alcohol use challenges;
  - need for one-bedroom units for those leaving foster care.

## Housing for specific household types

### The private rented sector

- 6.100 The 2018 Household Survey found that the private rented sector accommodates around 12.3% (11,931) of households across the Borough of Bexley. The characteristics of the private rented sector in Bexley have been reviewed in Chapter 4.

### Self-build and custom housebuilding

- 6.101 The National Planning Policy Framework (NPPF) 2012 set out that the government wants to enable more people to build their own homes and wants to make this form of housing a mainstream housing option. The Self-Build and Custom Housebuilding Act 2015 and subsequent Self-Build and Custom Housebuilding (Register) Regulations 2016 require authorities to maintain a register of those who have expressed an interest in buying serviced plots. Local authorities are under a duty to have regard to these registers in carrying out their planning function.
- 6.102 The 2018 Household Survey identified 119 households who would like to move to a self-build property. The Household Survey identified the following features relating to households considering self-build:



- 66.4% live in private rented accommodation and the remaining 33.6% in owner occupation;
- 66.4% were single households and 33.6% were younger couples;
- 33.6% were on incomes of £100 to £350 per week; 66.4% were on incomes of between £350 and £950 per week; and
- Mainly aspired towards two (66.4%) or four (33.6%) bedrooms.

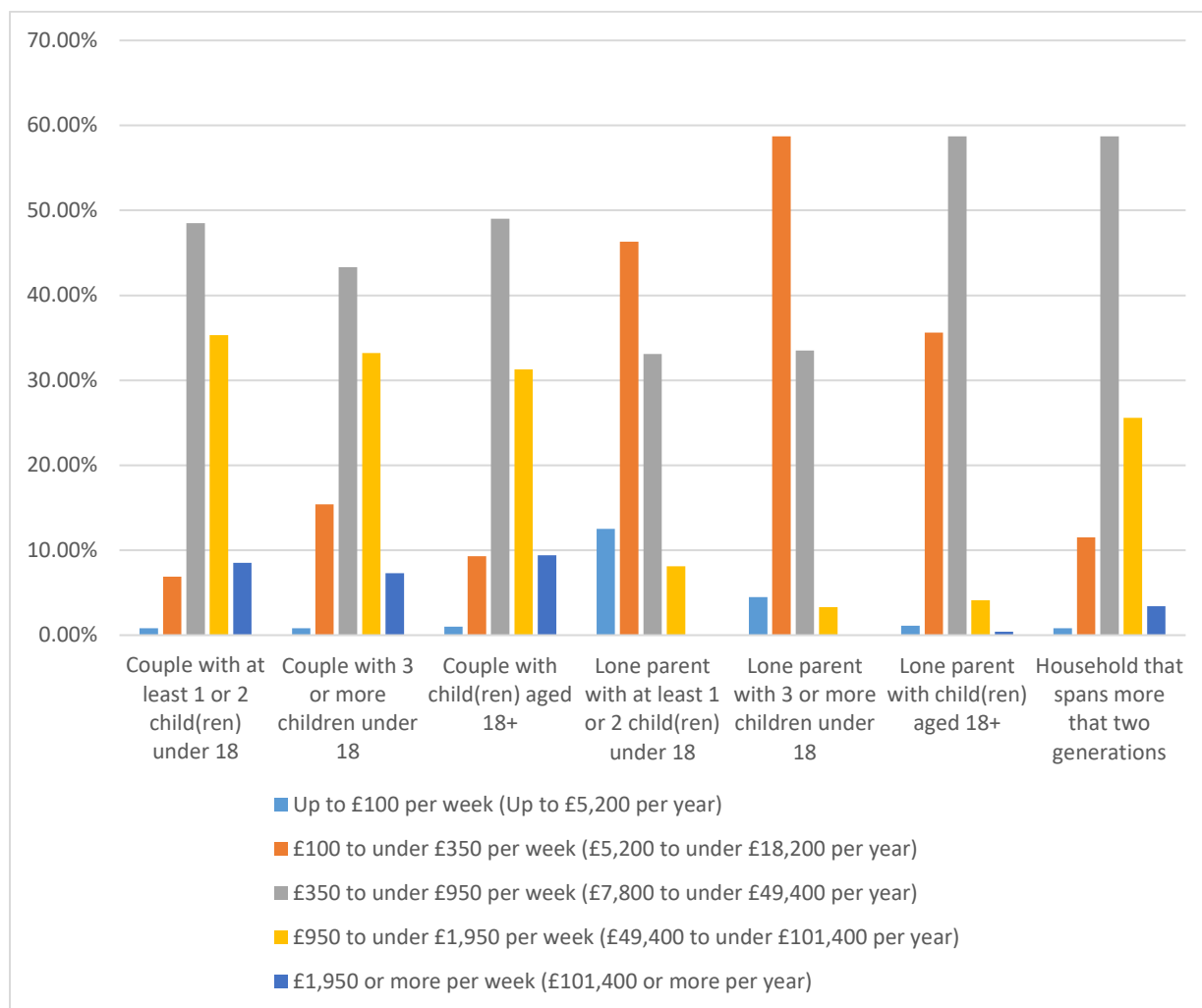
### Family housing/households with children

- 6.103 The 2018 Household Survey found that families (that is couples and lone parents) with dependent children (aged under 18) account for over one-quarter (29.1%) of households across the Borough of Bexley. A further 15.5% of all households are couples and lone parents with adult children (aged 18 or over) living with them. The analysis assumes therefore a total of 44.6% of households who are families (including those with adult children still living at home).
- 6.104 The current dwelling profile and market aspirations of families (including those with adult children living at home), as identified in the Household Survey, are summarised in Table 6.21. This suggests a particular aspiration for houses with three, four or more bedrooms (79.8% of families). Of these, 42.7% would like to move to a property with 4 or more bedrooms. In comparison, 19.5% would accept a move to a 4 or more bedroom property. Relatively few families have an aspiration or would accept moving to a flat or bungalow.

<b>Table 6.21 Property type preferences – families</b>			
<b>Dwelling type</b>	<b>Current dwelling</b>	<b>Like</b>	<b>Accept</b>
Detached house/cottage 1-2 Beds	0.2%	2.3%	5.8%
Detached house/cottage 3 Beds	2.0%	19.4%	9.4%
Detached house/cottage 4 or more Beds	4.9%	30.0%	5.5%
Semi-detached house/cottage 1-2 Beds	2.2%	2.5%	6.5%
Semi-detached house/cottage with 3 Beds	29.2%	11.1%	24.8%
Semi-detached house/cottage 4 or more Beds	18.9%	12.1%	10.5%
Terraced house/cottage 1-2 Beds	4.6%	2.8%	5.0%
Terraced house/cottage 3 Beds	17.2%	6.6%	11.5%
Terraced house/cottage 4 or more Beds	3.9%	0.6%	3.5%
Bungalow 1-2 Beds	0.6%	1.1%	3.4%
Bungalow 3 Beds	1.3%	3.5%	4.1%
Flat/Apartment 1 Bed	0.4%	1.7%	0.5%
Flat/Apartment 2 Beds	1.8%	0.0%	0.8%
Flat/Apartment 3 or more Beds	9.9%	3.4%	6.6%
Other 1-2 beds	2.7%	2.2%	0.5%
Other 3+ beds	0.0%	0.0%	0.7%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Base (Valid responses)	44,828	9,759	8,661
<b>SUMMARY</b>			
Houses 1/2 Beds	7.0%	7.6%	17.3%
Houses 3 Beds	48.4%	37.1%	45.7%
Houses 4 or more Beds	27.7%	42.7%	19.5%
Bungalow	1.9%	4.6%	7.5%
Flat	12.1%	5.1%	7.9%
Other	2.7%	2.2%	1.2%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Base (Valid responses)	44,828	9,759	8,661

Source: 2018 Household Survey

6.105 Income data obtained through the 2018 Household Survey is set out in Figure 6.2. This indicates that couples with children (dependent and adult) tend to have relatively high incomes when compared with the Borough-wide average. By comparison, lone parents with children have lower-than-average incomes.

**Figure 6.2 Family incomes comparison**

Source: 2018 Household Survey

- 6.106 In terms of housing need (see Table 5.4), compared with the overall proportion of households in need of 13.9%, around 18.3% of all families are in housing need. Overall, 19.3% of families with children under 18 are in housing need and 16.4% of families with adult children living at home are in housing need. The proportion of households in need is highest amongst lone parents with 3 or more children under 18 (851 or 66.9%) and couples with 3 or more children under 18 (1,811 or 37.2%).
- 6.107 Modelling of affordable housing requirements suggests that a range of affordable dwellings are required which will help to address the needs of families.
- 6.108 Looking further into the tenure occupied by families in housing need suggests that around 20.6% of couples with children living in housing need currently live in private rent, and 32.6% live in affordable housing. The data suggest that around 39.0% of lone parents in housing need are currently living in affordable accommodation, followed by around 35.5% living in private rent.

## Student households

- 6.109 There was no evidence of need for student households or of particular housing issues for this group based on stakeholder interviews and the household survey.

## Co-living

- 6.110 Co-living can broadly be defined as households where two or more people live together who are not related. The Household Survey identified around 440 households who could be classified as co-living. Most were either owner-occupiers (46.2%) or private renters (45%) and the remainder lived in affordable housing (8.9%). A range of dwelling types were occupied including two-bedroom houses (35.1%), three-bedroom houses (28.2%), four or more bedroom houses (8.9%) and two-bedroom flats (27.8%).

## Houses in multiple occupation

- 6.111 A house in multiple occupation (HMO) is a property rented out by at least three people who are not from one 'household' (for example a family) but share facilities like the bathroom and kitchen. A licence is required for a 'large' HMO, defined as a property where all of the following apply:
- It is rented for 5 or more people who form more than 1 household;
  - Some or all tenants share toilet, bathroom or kitchen facilities; and
  - At least one tenant pays rent (or their employer pays it for them)
- 6.112 According to official data, there are 1,400 HMOs across Bexley in 2015/16 (source: Local Authority Housing Statistics 2016/17) of which 120 are licenced. This compares with an estimate of 700 HMOs in 2011 (source: Housing Strategy Statistical Appendix 2011/12). It should be noted that the Borough has issued an Article 4 Direction which applies to the whole Borough and requires planning consent for a change of use from C3 to C4.

## Homeless and previously homeless households

- 6.113 Ministry of Housing, Communities and Local Government (MHCLG) Homelessness Statistics for the period 2009/10 to 2019/20 are presented in Table 6.22. Over this period, an annual average of 395 have been accepted as homeless/duty owed.

<b>Table 6.22 Homeless decisions and acceptances 2009/10 to 2016/17</b>		
<b>Year</b>	<b>Decisions made</b>	<b>Accepted as homeless (Duty owed from 2017/18)</b>
2009/10	261	128
2010/11	519	204
2011/12	922	346
2012/13	597	349
2013/14	583	420
2014/15	744	498
2015/16	706	483
2016/17	713	508
2017/18	799	500
2018/19	968	485
2019/20	694	427
Total	7,506	4,348
Annual average	682	395

Source: MHCLG Homelessness Statistics

- 6.114 The 2018 Household Survey identified a small number of households who had been previously homeless or living in temporary accommodation and had moved to their present accommodation in the past five years.
- 6.115 Table 6.23 presents a range of information relating to the characteristics of previously homeless households/living in temporary accommodation and the dwelling choices that they have made. 62.2% of households previously homeless have moved into social rented or affordable accommodation and 33.7% into private rented accommodation, while 4.2% now live in owner occupied dwellings. Three-quarters (76.6%) of previously homeless households/living in temporary accommodation have moved into flats, apartments or maisonettes, with most moving into small dwellings (44.9% with one bedroom/bedsit).
- 6.116 The incomes of previously homeless households are generally low with 23.8% receiving less than £100 each week, and a further 53.0% receiving between £100 and £350 each week. While 35.1% of previously homeless households identified as single adults under 65 years, a significant 52.3% of households include children under the age of 18. Of these, 29.8% are lone parents with one or two children.

<b>Table 6.23 Characteristics of households previously homeless</b>			
<b>Household Type</b>	<b>%</b>	<b>Property Type</b>	<b>%</b>
Single Adult (under 65)	35.1	House	19.0
Single Adult (65 or over)	2.6	Maisonette/Flat/apartment	76.6
Couple only (both under 65)	6.5	Other	4.5
Couple only (65 or over)	0.9		
Couple with 1 or 2 child(ren) under 18	6.7		
Couple with 3+ children under 18	7.9		
Lone parent with 1 or 2 child(ren) under 18	29.8		
Lone parent with 3+ children under 18	7.9		
Other	2.5		
<b>Total</b>	<b>100.0</b>	<b>Total</b>	<b>100.0%</b>
<b>Current tenure</b>	<b>%</b>		
Owner Occupied	4.2		
Private Rented	33.7		
Social Rented/Affordable	62.2		
<b>Total</b>	<b>100.0</b>		
<b>Current income (Gross weekly)</b>	<b>%</b>	<b>Property size</b>	<b>%</b>
Under £100	23.8	Studio/1 Bed	44.9
£100 to <£350	53.0	2 Beds	34.8
£350+	23.2	3 or more Beds	20.3
<b>Total</b>	<b>100.0%</b>	<b>Total</b>	<b>100.0%</b>

Base: 1,865 households previously homeless/living in temporary accommodation

Source: 2018 Household Survey

### Households in temporary accommodation

- 6.117 The number of households accepted as homeless by local authorities and the number of households in temporary accommodation (TA) continues to increase in England and is a particular issue in Bexley.
- 6.118 Households accepted as homeless in England have increased by 8% when comparing 2017/18 to 2013/14 and households in TA have increased by 37% when compared to 2013/14. The growth in demand for housing services is particularly prevalent in London where there has been an increase of 28% in TA and a 9% decrease in households accepted as homeless from 2013/14 to 2017/18 (source: Shelter Databank; MHCLG Live tables on homelessness ).
- 6.119 This compares to a 129% increase in the number of households in TA in Bexley (from a comparatively low base) and a 19% increase in the number of households accepted as homeless and in priority need. The number of children in TA has also significantly grown by 148% from 746 children in TA at the end of 2013/14 compared to 1,850 children in TA at the end of 2017/18 (source: Shelter Databank data for Bexley ). This compares to an increase of 32% in London and 48% in England for the number of children in TA over the same 5-year period. Data for the period 2018 to 2020 is not reported in MHCLG statistics.

6.120 The significant increases in the number of accepted homeless households along with a reduction in the number of affordable lettings made available in Bexley has resulted in rapid growth in the number of clients in TA. The overall trend for the number of affordable rented homes available to let each year has been declining and at the same time there has been a decrease in the supply of new build affordable rented properties.

#### Black and Minority Ethnic households (BAME)

- 6.121 The 2018 Household Survey indicates that 80.7% of Household Reference People describe themselves as White British and 19.3% describe themselves as having other ethnicities. Of these, 6.3% are Black/African/Caribbean/Black British, 3.7% are Asian/Asian British, 3.2% are White Central/Eastern European, 0.9% White Irish, 0.2% White Gypsy/Traveller and 3.3% are White Other. A further 1.1% have a mixed ethnicity and 0.7% are other ethnic groups.
- 6.122 In terms of spatial trends, analysis of ethnicity across the ward areas shows some variations. Above-average proportions of HRPs identified as White British in Blendon & Penhill Ward (90.9%), Blackfen & Lamorbey (89.6%) and West Heath (88.3%). Compared with the Borough average of 6.3%, higher proportions of HRPs identified as Black/African/Caribbean/Black British in Thamesmead East Ward (30.6%) and Slade Green & Northend Ward (15.1%). In Erith a high of 6.8% HRPs identified as Asian/Asian British, compared with the Borough-wide average of 3.7%.
- 6.123 Based on the 2018 Household Survey, housing information relating to BAME households includes:
- Around 58.0% are owner occupiers, 24.8% rent privately and 17.2% live in affordable housing (social rented or intermediate tenures); and
  - 27.9% BAME households were in some form of housing need (compared with 13.9% of all households), with key needs factors being overcrowding (47.9% of households in need) and 19.2% sharing facilities with other households.
- 6.124 The 2011 Census identified 623 people with Gypsy and Traveller ethnicity living in 204 households. Of these, 15 people (six households) lived in a caravan or other temporary structure and the remainder in bricks and mortar accommodation (house/bungalow or flat/maisonette/apartment).
- 6.125 The MHCLG Traveller Caravan Count (January 2020) identified a total of 36 caravans in the Borough of Bexley. All of these were on authorised private sites (with planning permission). The MHCLG Count of Travelling Showpeople caravans (undertaken annually every January) recorded no Travelling Showpeople's caravans in January 2020. The GTAA 2021 update has found there are sufficient pitches available over the five year period 2018/19 to 2022/23 and an overall need for 4 pitches to 2038 based on a cultural definition of need of which the PPTS need is 0.5 pitches. Future planning policy should acknowledge this level of need.

## Summary

- 6.126 This chapter has considered the needs of different groups in line with the NPPF and requirements of the brief. Key findings are now summarised.
- 6.127 In terms of older people, it is evident that the vast majority of older people wish to stay within their existing homes. For most, this is an informed and appropriate choice where current and future housing needs can be addressed through in situ solutions (including adaptations).
- 6.128 A key conclusion is that there needs to be a broader housing offer for older people across the Borough and the SHMA has provided evidence of scale and range of dwellings needed.
- 6.129 A wealth of information has been assembled from various sources which helps to scope out the likely level of disability across the Borough's population. Although it is a challenge to quantify the precise accommodation and support requirements, the SHMA has helped to scope out where needs are arising.



## 7. Dwelling type and mix

### Introduction

- 7.1 The purpose of this chapter is to consider the dwelling type and size mix which is appropriate for Bexley. There are two main data sources that inform this analysis: household projections and data exploring the relationship between households and dwellings derived from the Bexley 2018 Household Survey.
- 7.2 The latest GLA 2016-based household projections are used to establish the number of households by HRP and household type and how this is expected to change over the plan period 2018-2038.
- 7.3 Household Survey data can be used to establish the relationship between HRP age group and household type and the dwelling types and sizes occupied (Table 7.1). The Household Survey also provides data on household aspirations and what households would expect to move to. This data can also be broken down by HRP age group and household type.
- 7.4 By combining this range of data, it is possible to model the likely change in dwelling type/size requirements with reference to:
- The current relationship between HRP/household type and dwelling type/size and whether this remains constant over the plan period (demographic baseline);
  - Household aspirations by HRP/household type (aspirations); and
  - What households would accept by HRP/household type (accept).

Age group of Household Reference Person	Household (HH) type	Dwelling type	Dwelling size
15_24	One Person	1 Bed House	1 Bedroom
25_34	Couple only	2 Bed House	2 Bedrooms
35_44	HH with 1/2 Child(ren)	3 Bed House	3 Bedrooms
45_59	HH with 3 Children	4 or more bed House	4+ Bedrooms
60_84	Other Multi-person	1 Bed Flat	All
85+	All	2 Bed Flat	
All		3+ Bed flat	
		1 Bed Bungalow	
		2 Bed Bungalow	
		3+ Bed Bungalow	
		All	

- 7.5 Table 7.2 summarises the change in the number of households by age group and household type over the period 2018-38 based on GLA 2016-based household projections.

**Table 7.2 Change in number of households by age group 2018-2038**

Year and Household Type	Household Reference Person Age Group						Total
	15-24	25-34	35-44	45-59	60-84	85+	
<b>2018</b>							
One Person	596	2,439	2,952	6,135	11,944	3,168	27,234
Couple only	167	2,515	1,486	3,822	12,560	1,028	21,578
HH with 1/2 Child(ren)	956	5,720	9,816	10,768	634	9	27,904
HH with 3 Children	63	1,282	2,721	1,579	33	1	5,679
Other Multi-person	342	1,094	957	8,465	5,981	805	17,643
Total	2,124	13,049	17,932	30,769	31,153	5,012	100,039
<b>2038</b>							
One Person	574	1,535	3,082	7,846	14,469	4,874	32,380
Couple only	50	1,727	1,325	2,047	17,582	2,155	24,885
HH with 1/2 Child(ren)	1,255	5,142	10,667	15,449	1,156	9	33,679
HH with 3 Children	90	1,466	2,648	2,430	45	1	6,679
Other Multi-person	407	1,511	1,190	10,361	10,000	2,148	25,617
Total	2,376	11,381	18,911	38,133	43,252	9,186	123,240
<b>Change 2018-38</b>							
One Person	-23	-904	130	1,711	2,525	1,706	5,146
Couple only	-117	-787	-161	-1,775	5,021	1,126	3,307
HH with 1/2 Child(ren)	299	-578	851	4,681	522	0	5,775
HH with 3 Children	27	184	-73	851	11	0	1,000
Other Multi-person	66	417	233	1,896	4,019	1,343	7,974
Total	252	-1,668	980	7,364	12,098	4,175	23,201

Source: 2016-based GLA Household Projections

## Demographic baseline scenario

- 7.6 Under the demographic baseline, the relationship between HRP/household type and dwelling type/size remains constant over the plan period. The impact of this on overall dwelling type/mix is shown in Table 7.3. Analysis indicates that the majority of need will be for 2-bedroom (23.1%) and 3-bedroom (47.3%) dwellings followed by four or more bedroom (19.4%) and one-bedroom (10.1%) dwellings. Regarding dwelling type, analysis suggests a broad split of 71.3% houses, 19.3% flats, 8.8% bungalows (or level-access accommodation) and 0.7% other types.

**Table 7.3 Impact of change in households by age group on dwellings occupied: baseline demographic**

Dwelling type/size	Age group of Household Reference Person							Total	% change
	15-24	25-34	35-44	45-59	60-84	85+			
1 Bed House	0	0	9	51	39	0	98	0.4	
2 Bed House	0	-235	109	609	1,056	268	1,808	7.8	
3 Bed House	18	-576	392	3,237	5,230	1,828	10,130	43.7	
4 or more Bed House	51	-137	199	1,939	2,233	220	4,505	19.4	
1 Bed Flat	66	-259	84	566	1,046	457	1,959	8.4	
2 Bed Flat	117	-393	147	577	1,324	497	2,269	9.8	
3+ Bed Flat	0	-37	25	104	147	0	240	1.0	
1-2 Bed Bungalow	0	0	4	131	668	647	1,450	6.3	
3+ Bed Bungalow	0	-22	10	113	299	190	590	2.5	
1 Bed Other	0	0	0	27	45	47	119	0.5	
2 Bed Other	0	-10	0	0	0	21	11	0.0	
3+ Bed Other	0	0	2	9	10	0	21	0.1	
<b>Total</b>	<b>252</b>	<b>-1,668</b>	<b>980</b>	<b>7,364</b>	<b>12,098</b>	<b>4,175</b>	<b>23,201</b>	<b>100.0</b>	

Dwelling size	Age group of Household Reference Person							Total	% change
	15-24	25-34	35-44	45-59	60-84	85+			
1	66	-259	93	659	1,208	579	2,347	10.1	
2	117	-637	260	1,302	2,970	1,357	5,368	23.1	
3	18	-634	428	3,464	5,687	2,018	10,981	47.3	
4 or more	51	-137	199	1,939	2,233	220	4,505	19.4	
<b>Total</b>	<b>252</b>	<b>-1,668</b>	<b>980</b>	<b>7,364</b>	<b>12,098</b>	<b>4,175</b>	<b>23,201</b>	<b>100.0</b>	

Note: totals by age group may vary slightly due to rounding errors

Source: GLA 2016-based household projections and 2018 Household Survey

## Aspiration scenario

7.7 Under the aspiration scenario, the relationship between HRP/household type and dwelling type/size is based on the aspirations of households who are intending to move in the next 5 years. The profile of dwellings is applied to changes in HRP/household type over the plan period. The impact of this on overall dwelling type/mix is shown in Table 7.4. Analysis indicates that the majority of need is still for 2-bedroom (37.6%) and 3-bedroom (32.3%) dwellings followed by one bedroom (15.5%) and four or more bedroom (14.5%) dwellings. Regarding dwelling type, analysis suggests a marked shift towards bungalow/level access accommodation (which is a reflection of the underlying ageing of the population), with broad split of 48.7% houses, 17.4% flats, 23.2% bungalows (or level-access accommodation), with a marked increase in other property types (10.7% which is principally older persons' specialist accommodation).

**Table 7.4 Impact of change in households by age group on dwellings occupied: aspirations**

Dwelling type/size	Age group of Household Reference Person						Total	% change
	15-24	25-34	35-44	45-59	60-84	85+		
1 Bed House	0	0	0	44	32	0	76	0.3
2 Bed House	88	-212	129	1,135	1,553	0	2,692	11.6
3 Bed House	119	-707	395	2,273	2,208	887	5,176	22.3
4 or more Bed House	45	-638	347	2,047	1,578	0	3,379	14.5
1 Bed Flat	0	0	11	438	578	0	1,027	4.4
2 Bed Flat	0	-29	31	244	1,727	783	2,756	11.9
3+ Bed Flat	0	-17	38	233	10	0	263	1.1
1-2 Bed Bungalow	0	-11	0	374	2,466	626	3,455	14.9
3+ Bed Bungalow	0	-25	0	533	1,120	313	1,941	8.3
1 Bed Other	0	0	9	0	478	1,618	2,105	9.1
2 Bed Other	0	0	0	46	210	0	256	1.1
3+ Bed Other	0	-29	18	0	139	0	128	0.6
<b>Total</b>	252	-1,668	980	7,364	12,098	4,227	23,253	100.0

Dwelling size	Age group of Household Reference Person						Total	% change
	15-24	25-34	35-44	45-59	60-84	85+		
1	0	-1	21	525	1,376	1,691	3,612	15.5
2	88	-251	160	1,754	5,667	1,336	8,754	37.6
3	119	-778	452	3,038	3,476	1,200	7,508	32.3
4 or more	45	-638	347	2,047	1,578	0	3,379	14.5
<b>Total</b>	252	-1,668	980	7,364	12,098	4,227	23,253	100.0

## Accept scenario

- 7.8 Under the accept scenario, the relationship between HRP/household type and dwelling type/size is based on what households would accept to move to if they are intending to move in the next 5 years. The profile of dwellings is applied to changes in HRP/household type over the plan period. The impact of this on overall dwelling type/mix is shown in Table 7.5. Analysis indicates a stronger need for two bedroom dwellings (45.1%) followed by 3-bedroom (32.5%) dwellings followed by one bedroom (15.8%) and four or more bedroom (6.5%) dwellings. Regarding dwelling type, analysis continues to suggest a marked shift towards bungalow/level access accommodation, with broad split of 42.4% houses, 21.5% flats, 21.3% bungalows (or level-access accommodation) and 14.7% other property types (principally older persons' specialist accommodation).

<b>Table 7.5 Impact of Change in households by age group on dwellings occupied: accept</b>								
<b>Dwelling type/size</b>	<b>Age group of Household Reference Person</b>							<b>% change</b>
	<b>15-24</b>	<b>25-34</b>	<b>35-44</b>	<b>45-59</b>	<b>60-84</b>	<b>85+</b>	<b>Total</b>	
1 Bed House	48	-48	28	188	246	0	462	2.0
2 Bed House	119	-456	268	1,491	1,445	0	2,867	12.4
3 Bed House	45	-734	342	2,633	2,713	0	4,999	21.5
4 or more Bed House	0	-158	161	831	685	0	1,519	6.5
1 Bed Flat	0	-96	47	557	1,490	0	1,998	8.6
2 Bed Flat	40	-120	82	535	579	1,898	3,013	13.0
3+ Bed Flat	0	-18	0	0	0	0	-18	-0.1
1-2 Bed Bungalow	0	-39	0	751	1,880	0	2,591	11.2
3+ Bed Bungalow	0	0	17	291	1,293	759	2,360	10.2
1 Bed Other	0	0	15	0	899	0	913	3.9
2 Bed Other	0	0	20	0	755	1,518	2,294	9.9
3+ Bed Other	0	0	0	88	115	0	203	0.9
<b>Total</b>	<b>252</b>	<b>-1,668</b>	<b>980</b>	<b>7,364</b>	<b>12,098</b>	<b>4,175</b>	<b>23,201</b>	<b>100.0</b>
<b>Dwelling size</b>								
	<b>Age group of Household Reference Person</b>							<b>% change</b>
	<b>15-24</b>	<b>25-34</b>	<b>35-44</b>	<b>45-59</b>	<b>60-84</b>	<b>85+</b>	<b>Total</b>	
1	48	-148	90	833	2,855	0	3,676	15.8
2	159	-610	370	2,689	4,438	3,416	10,462	45.1
3	45	-752	359	3,012	4,120	759	7,544	32.5
4 or more	0	-158	161	831	685	0	1,519	6.5
<b>Total</b>	<b>252</b>	<b>-1,668</b>	<b>980</b>	<b>7,364</b>	<b>12,098</b>	<b>4,175</b>	<b>23,201</b>	<b>100.0</b>

## Summary of scenarios

- 7.9 Table 7.6 summarises the outcome of the dwelling type/mix scenario analysis. The key message is by taking into account what people aspire to and what they would accept, there is a marked shift towards a need for smaller dwellings and a reduced emphasis of houses in favour of flats and bungalows/level access accommodation. Of particular note is the marked increase in need for other property types, principally older persons' specialist housing, under both the aspiration and accept scenarios. However, factors such as density – and particularly seeking to maximise dwelling density in new developments – will also be important for the Council to consider in terms of their policy response. An overall average figure has been presented which takes into account the baseline, aspiration and accept data. This is a reasonable basis for establishing overall dwelling mix by size, type and tenure.

<b>Table 7.6 Summary of dwelling type/mix scenarios</b>				
<b>Dwelling type/size</b>	<b>Demographic baseline (%)</b>	<b>Aspiration (%)</b>	<b>Accept (%)</b>	<b>Average (%)</b>
1/2 Bed House	8.2	11.9	14.3	11.5
3 Bed House	43.7	22.3	21.5	29.2
4+ Bed House	19.4	14.5	6.5	13.5
1 Bed Flat	8.4	4.4	8.6	7.1
2/3 Bed Flat	10.8	13.0	12.9	12.2
1-2 Bed Bungalow	6.4	14.9	11.2	10.8
3+ Bed Bungalow	2.5	8.3	10.2	7.0
Other	0.7	10.7	14.7	8.7
<b>TOTAL</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Dwelling type</b>	<b>Demographic baseline (%)</b>	<b>Aspiration (%)</b>	<b>Accept (%)</b>	<b>Average (%)</b>
House	71.3	48.7	42.4	54.1
Flat	19.3	17.4	21.5	19.4
Bungalow	8.8	23.2	21.3	17.8
Other	0.7	10.7	14.7	8.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Number of bedrooms</b>	<b>Demographic baseline (%)</b>	<b>Aspiration (%)</b>	<b>Accept (%)</b>	<b>Average (%)</b>
1	10.1	15.5	15.8	13.8
2	23.1	37.6	45.1	35.3
3	47.3	32.3	32.5	37.4
4	19.4	14.5	6.5	13.5
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

## Overall dwelling mix by tenure

- 7.10 A final adjustment is made to the analysis which takes into account detailed analysis of market demand, affordable need and the need for intermediate tenure dwellings. This takes into account the range of affordable rented and intermediate housing needed and the types of dwelling that would be accepted; and a blend of the aspirations and expectations of those wanted to move in the market. The reason for including aspirations is that there is greater potential for market movers to realise their market aspirations.
- 7.11 Table 7.7 presents the dwelling type and size profile appropriate for Bexley for each tenure group. This assumes an annual target of 685 dwellings based on the 2021 London Plan target and an affordable housing target of 50% with a 70% rented and 30% affordable home ownership tenure split.

<b>Table 7.7A dwelling type and size need by tenure (%)</b>				
<b>Dwelling size</b>	<b>Tenure</b>			<b>All tenures</b>
	<b>Market</b>	<b>Affordable Rented</b>	<b>Affordable intermediate</b>	
1 or 2-bedroom house	19.2	30.5	30.4	23.1
3-bedroom house	35.2	12.6	31.4	29.2
4 or more-bedroom house	21.2	4.9	10.5	16.1
1-bedroom flat	3.8	13.6	7.6	6.6
2 or more-bedroom flat	7.5	20.5	11.2	11.1
1-bedrom bungalow/ level-access	0.1	1.3	0.7	0.5
2-bedroom bungalow/ level-access	6.5	7.6	2.0	6.3
3 or more bedroom bungalow/ level-access	4.2	1.8	1.8	3.3
Other	2.3	7.4	4.5	3.8
<b>TOTAL</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Dwelling type</b>	<b>Market</b>	<b>Affordable Rented</b>	<b>Affordable intermediate</b>	<b>All tenures</b>
House	75.6	47.9	72.3	68.4
Flat	11.3	34.0	18.8	17.7
Bungalow/level-access	10.9	10.7	4.4	10.1
Other	2.3	7.4	4.5	3.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Number of bedrooms</b>	<b>Market</b>	<b>Affordable Rented</b>	<b>Affordable intermediate</b>	<b>All tenures</b>
1	5.7	18.6	12.8	9.6
2	32.0	59.3	42.7	39.8
3	41.1	17.3	34.0	34.5
4	21.2	4.9	10.5	16.1
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Table 7.7B dwelling type and size need by tenure (number)</b>				
<b>Dwelling size</b>	<b>Tenure</b>			<b>All tenures</b>
	<b>Market</b>	<b>Affordable Rented</b>	<b>Affordable intermediate</b>	
1 or 2-bedroom house	66	73	31	170
3-bedroom house	120	30	32	183
4 or more-bedroom house	73	12	11	95
1-bedroom flat	13	33	8	53
2 or more-bedroom flat	26	49	12	86
1-bedrom bungalow/ level-access	0	3	1	4
2-bedroom bungalow/ level-access	22	18	2	43
3 or more bedroom bungalow/ level-access	14	4	2	20
Other	8	18	5	30
<b>TOTAL</b>	<b>342</b>	<b>240</b>	<b>103</b>	<b>685</b>
<b>Dwelling type</b>	<b>Market</b>	<b>Affordable Rented</b>	<b>Affordable intermediate</b>	<b>All tenures</b>
House	259	115	74	448
Flat	39	82	19	140
Bungalow/level-access	37	26	5	67
Other	8	18	5	30
<b>Total</b>	<b>342</b>	<b>240</b>	<b>103</b>	<b>685</b>
<b>Number of bedrooms</b>	<b>Market</b>	<b>Affordable Rented</b>	<b>Affordable intermediate</b>	<b>All tenures</b>
1	19	45	13	77
2	109	142	44	296
3	141	42	35	217
4	73	12	11	95
<b>Total</b>	<b>342</b>	<b>240</b>	<b>103</b>	<b>685</b>

Note Table 7.7 (number) is subject to arithmetical rounding errors which means that, if turned into a %, the total all tenures column would be slightly different to the percentages reported in Table 7.7 (%) all tenures column

## Conclusions

- 7.12 The purpose of this chapter has been to explore the relationship between households and dwellings occupied to establish an indication of appropriate dwelling mix for Bexley over the plan period.
- 7.13 Having established future household change and the implications this has for dwelling type, size and tenure mix, the Council can make informed strategic decision in the range of dwellings to be built over the period 2018 to 2038.



## 8. Conclusion: policy and strategic issues

- 8.1 This document has been prepared to equip the Council and their partners with robust, defensible and transparent information to help inform strategic decision-making and the formulation of appropriate housing and planning policies. The work also takes account of existing and emerging government policy and guidance.
- 8.2 The Borough of Bexley SHMA 2021 will help the Council plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Specifically, the study identifies the size, type and tenure of housing required by considering current market demand relative to supply; and also identifies a continued affordable housing imbalance across the Borough.
- 8.3 This concluding chapter summarises key messages from the research findings, structured around a commentary on the current and future housing markets and key local strategic issues.

### The Borough context

- 8.4 The original 2018 SHMA brief asked us to assess housing need in the specific context of the Borough. Our conclusions about what makes Bexley distinctive are now set out:

### Bexley's housing markets

- 8.5 Overall, Bexley is a suburban market area and the Borough can be subdivided into three broad geographical areas:
- Abbey Wood, Belvedere and Erith (north of Borough typified by older terraced housing but the western area of Thamesmead is a 1960s 'new town');
  - Welling and Bexleyheath (largely suburban and densely developed);
  - Bexley, Crayford and Sidcup (more diverse role reflecting their origins within the county of Kent).
- 8.6 The overall character and price of local housing supply is closely related to road and rail transport links.
- 8.7 Local suburban housing markets are driven largely by city of London employment and the Crossrail station at Abbey Wood.

### Particular pressures

- 8.8 These are encapsulated in the opening statement in the Adult Social Care Market Position Statement 2015-18: "Although an outer London Borough, Bexley experiences many inner London pressures, such as population change and migration; pressures on housing stock and school places; transport infrastructure; and disparities in the jobs market. Bexley has an ageing population, with the third highest level of people aged 65+ in London".

## Future housing need and drivers for change

- 8.9 We have evidenced the need for housing based on the MHCLG standard methodology using a range of demographic data. The SHMA has followed the MHCLG standard methodology and established a range of housing needs outputs based on alternative demographic projections.
- 8.10 The 2021 London Plan has established a target of 6,850 net dwellings to be built in the Borough of Bexley over the period 2019/20 to 2028/29 or 685 each year.
- 8.11 The 2020 standard method calculation establishes a baseline minimum annual need for 1,295 dwellings based on demographics, an adjustment to take account of affordability, a cap linked to the London Plan figure and a cities and urban centres uplift. A comprehensive analysis of alternative demographic scenarios confirms that this standard method baseline provides an appropriate base for the assessment of need.
- 8.12 Planning Practice Guidance says ‘it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs. (Paragraph: 034 Reference ID: 2a-034-20201216).

## Dwelling type and mix

- 8.13 The relationship between household change and dwelling type/size and tenure requirements have been fully explored. Evidence will help the Council deliver an appropriate range of dwelling stock for residents over the plan period. There is a need for a broad range of dwellings, with a particular emphasis on two and three bedroom dwellings. When household aspirations and what people would accept are considered, there is a marked shift towards a need for smaller dwellings and a reduced emphasis on houses in favour of flats and bungalows/level access accommodation. There is also a marked increase in the need for older persons’ specialist accommodation.
- 8.14 Regarding affordable need, there is an annual imbalance of 1,378. This compares with 965 in the 2018 SHMA and 837 in the 2014 SHMA. The latest analysis reflects a reduction in the affordability of market prices and rents and a reduction in lettings.
- 8.15 Analysis indicates that appropriate dwelling profiles are:
- Affordable rented: 18.3% one-bedroom, 59.4% two-bedroom, 17.3% three-bedroom, 5.0% four or more-bedroom.
  - Affordable intermediate: 10.1% one-bedroom, 30.8% two-bedroom, 37.8% three-bedroom, 21.3% four or more-bedroom.
- 8.16 Evidence from the housing register points to higher need for smaller dwellings. An appropriate affordable tenure split for the Borough of Bexley would be around 70% rented and 30% intermediate tenure.

## Meeting the needs of older people and those with disabilities

- 8.17 There is evidence to support a programme of accommodation delivery to help meet the needs of older people and those with disabilities. Although the vast majority of older people want to remain in their own home with support when needed, there is a need to diversify options available to older people wanting to move to more appropriate accommodation. Currently there are around 3,644 units of specialist older person accommodation including around 1,186 units of residential care (C2) dwellings. Analysis of demographic change would suggest a need for an additional 928 units of specialist (C3) units and 448 additional units of residential care (C2) to 2038.
- 8.18 A key conclusion is that there needs to be a broader housing offer for older people across the Borough and the SHMA has provided evidence of scale and range of dwellings needed.
- 8.19 A wealth of information has been assembled from various sources which helps to scope out the likely level of disability across the Borough's population. Although it is a challenge to quantify the precise accommodation and support requirements, the SHMA has helped to scope out where needs are arising.
- 8.20 Given the changing demographics of the Borough, it is wholly appropriate that the Council has a policy of ensuring new dwellings meet optional accessibility standards as set out in the London Plan. These are 90% for M4(2) accessible and adaptable and 10% for M4(3) wheelchair adapted properties. It is also assumed that there will be ongoing adaptation of existing dwellings to support those with additional needs.

## Final comments

- 8.21 The evidence presented in this SHMA suggests that there are three main policy areas that require particular attention from both a planning policy and social policy perspective:
- the challenge of enabling the quantity and mix of housing that needs to be delivered;
  - the challenge of ensuring that the housing and support needs of older people are met going forward; and
  - ensuring that new development takes account of the particular needs across housing market areas within Bexley.

## Introduction to Technical Appendices

- Technical Appendix A: Research methodology
- Technical Appendix B: Policy review
- Technical Appendix C: Housing need
- Technical Appendix D: Monitoring and updating
- Technical Appendix E: Stakeholder survey

## Technical Appendix A: Research methodology

### Overall approach

- A.1 A multi-method approach was adopted in order to prepare a robust and credible Strategic Housing Market Assessment for the London Borough of Bexley Council:
- A survey of households across the Borough of Bexley area. 27,000 households in the Borough initially contacted and invited to complete a questionnaire. A further 4,000 households were contacted in order to boost responses during the fieldwork period. 3,408 questionnaires were returned and used in data analysis. This represents a 11% response rate overall resulting in a Borough-level sample error of +/-1.65%;
  - An online survey of key stakeholders including representatives from district and county councils, district and parish councillors, housing associations, voluntary groups and some independent representatives;
  - Interviews with estate and letting agents operating within the Borough; and
  - A review of relevant secondary data including the 2011 Census, house price trends, CORE lettings data and CLG Statistics.

### Baseline dwelling stock information and Household Survey sample errors

- A.2 Table A1 summarises total dwelling stock and the number of households contacted by survey area, achieved responses and sample errors.

Table A1 Household Survey sample information						
Local analysis areas (Defined by ward)	Total Households (Council Tax)	Mail out	Achieved Response	Sampling Error	Achieved Response Rate	
					Rate (%)	Census or Sample
Barnehurst Ward	4569	1580	198	6.20%	12.5	Sample
Belvedere Ward	7001	1600	152	6.22%	9.5	Sample
Bexleyheath Ward	6546	1593	236	6.22%	14.8	Sample
Blackfen & Lamorbey Ward	6449	1593	205	6.22%	12.9	Sample
Blendon & Penhill Ward	6193	1593	198	6.22%	12.4	Sample
Crayford Ward	6662	1600	193	6.21%	12.1	Sample
Crook Log Ward	6363	1593	229	6.22%	14.4	Sample
East Wickham Ward	6148	1593	190	6.22%	11.9	Sample
Erith Ward	4505	1580	150	6.20%	9.5	Sample
Falconwood & Welling Ward	6507	1593	205	6.22%	12.9	Sample
Longlands Ward	4310	1580	243	6.19%	15.4	Sample
Northumberland Heath Ward	4187	1580	179	6.19%	11.3	Sample
Sidcup Ward	6863	1600	243	6.21%	15.2	Sample
Slade Green & Northend Ward	4866	1587	180	6.20%	11.3	Sample
St Mary's & St James Ward	4545	1580	267	6.20%	16.9	Sample
Thamesmead East Ward	6003	1593	142	6.21%	8.9	Sample
West Heath Ward	6047	1593	198	6.21%	12.4	Sample
<b>Total</b>	<b>97,764</b>	<b>27,033</b>	<b>3,408</b>	<b>1.51%</b>	12.6	Sample

Source: Council Tax Data 2017

Sample error is based on the 95% confidence interval which is the industry standard to establish result accuracy.

## Weighting and grossing

A.3 In order to proceed with data analysis, it is critical that survey data is weighted to take into account response and non-response bias and grossed up to reflect the total number of households. Weighting for each survey area was based on:

- **Tenure** (the proportion of affordable (social rented and intermediate tenure) and open market dwellings based on 2011 Census data);
- **Age of Household Reference Person** based on the proportions of household reference people aged under 65 and 65 or over living in affordable and open market provision derived from the 2011 Census; and

- **Council Tax occupied dwellings** based on the number of occupied dwellings and used as a grossing factor in the weighting to ensure that there is a suitable uplift on the Census 2011 data.
- A.4 Ultimately, the survey element of the assessment is sufficiently statistically robust to undertake detailed analysis and underpin core outputs of the study down to the survey areas presented in Table A1. Furthermore, the survey findings are enhanced and corroborated through analysis of secondary data and stakeholder consultation.

## Technical Appendix B: Affordable housing definitions

### Affordable housing definitions

Definitions relating to affordable housing are presented in the NPPF 2021 (Annex 2):

**Affordable housing:** housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the government's rent policy for social rent or affordable rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes, affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and Rent to Buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to government or the relevant authority specified in the funding agreement.



## Technical Appendix C: Housing need calculations

### Introduction

- C.1 Identifying the scale of affordable housing need is a key consideration of planning practice guidance. This is a separate calculation to the overall housing need figure derived using the standard model and set out in PPG paragraphs 18 (Reference ID: 2a-018-20190220) to 24 (Reference ID: 2a-024-20190220). The affordable housing need analysis helps to establish the overall scale of affordable housing need by location, type, size and tenure and whether the council should plan for more dwellings to help meet the need for affordable housing.
- C.2 PPG states that ‘all households whose needs are not met by the market can be considered in affordable housing need (**PPG Paragraph: 018 Reference ID: 2a-018-20190220**)’. PPG then considers how affordable housing need should be calculated:
- ‘Strategic policy-makers will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments). (PPG Paragraph: 019 Reference ID: 2a-019-20190220)*
- C.3 The PPG focuses on the use of existing (secondary data). Where possible this is supplemented with primary household survey data. For Bexley, data from the 2018 household survey, affordable housing lettings and material from the latest 2021 housing register provides an appropriate range of sources from which a robust estimate of affordable housing need can be calculated.
- C.4 There are four broad components to the needs assessment method. These have remained relatively unchanged through the different guidance issued by government and focus on:
- Step A. Existing household in need (current unmet gross need).
  - Step B. Future households in need.
  - Step C. Affordable supply.
  - Step D. Annual need for affordable housing.
- C.5 To be consistent with the standard method for calculating overall housing need, the affordable housing need is annualised over a ten-year period.
- C.6 Table C1 provides an overall summary of needs analysis.

<b>Table C1 PPG Needs Assessment Summary for the London Borough of Bexley</b>			
<b>Step</b>	<b>Stage and Step description</b>	<b>Calculation</b>	<b>LB Bexley Total</b>
<b>Stage 1: CURRENT NEED</b>			
1.1	<b>TOTAL</b> in need	Current need	13,631
1.2	<b>TOTAL</b> in need and cannot afford open market (buying or renting)	82.2% cannot afford	11,207
<b>Stage 2: FUTURE NEED</b>			
2.1	New household formation (gross per year)	Based on national rate and aspiration	2,218
2.2	% of new households requiring affordable housing	% Based on actual affordability of households forming	74.8%
		Number	1,659
2.3	Existing households falling into need	Annual requirement	38
<b>2.4</b>	<b>TOTAL newly-arising housing need (gross each year)</b>	<b>2.2 + 2.3</b>	<b>1,697</b>
<b>Stage 3: AFFORDABLE HOUSING SUPPLY</b>			
3.1	Affordable dwellings occupied by households in need	Households in 1.1 who are in affordable dwellings	3,968
3.2	Surplus stock	Vacancy rate <2% so no surplus stock assumed	0
3.3	Committed supply of new affordable units	Estimated 5 years	765
3.4	Units to be taken out of management	None assumed	0
3.5	Total affordable housing stock available	3.1+3.2+3.3-3.4	4,733
3.6	Annual supply of social re-lets (net)	Annual Supply	587
3.7	Annual supply of intermediate affordable housing available for re-let or resale at sub-market levels	Annual Supply	56
<b>3.8</b>	<b>Annual supply of affordable housing</b>	<b>3.6+3.7</b>	<b>643</b>
<b>Stage 4: ESTIMATE OF ANNUAL HOUSING NEED</b>			
4.1	Total backlog need	1.1-3.5	6,474
4.2	Quota to reduce (over 20 years)	Annual reduction	5%
4.3	Annual backlog reduction	Annual requirement	324
4.4	Newly-arising need	2.4	1,697
4.5	Total annual affordable need	4.3+4.4	2,021
4.6	Annual social rented capacity	3.8	643
<b>4.7</b>	<b>NET ANNUAL SHORTFALL (4.5-4.6)</b>	<b>NET</b>	<b>1,378</b>

Source: 2018 Household Survey; RP Core Lettings and Sales data

Data presented in the table may be subject to rounding errors

## Stage 1: Current need

- C.7 PPG **Paragraph 021 Reference ID 2a-021-20190220**) states that ‘strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:
- the number of homeless households;
  - the number of those in priority need who are currently housed in temporary accommodation;
  - the number of households in over-crowded housing;
  - the number of concealed households;
  - the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and
  - the number of households from other tenures in need and those that cannot afford their own homes, either to rent or to own if that is their aspiration.’
- C.8 PPG notes that care should be taken to avoid double-counting and to only include those households who cannot afford to access suitable housing in the market. Table C1 sets out the overall scale of current need before affordability testing is carried out.
- C.9 Using the 2018 Household Survey, an up to date position on the number of households in each of the above categories of need can be established (Table C2) for the period starting 2018.

<b>Table C2 Summary of current housing need across London Borough of Bexley</b>		
<b>Category</b>	<b>Factor</b>	<b>Bexley</b>
Homeless households or with insecure tenure	N1 Under notice, real threat of notice or lease coming to an end	1,283
	N2 Too expensive, and in receipt of housing benefit or in arrears due to expense	1,114
Mismatch of housing need and dwellings	N3 Overcrowded according to the 'bedroom standard' model	6,002
	N4 Too difficult to maintain	1,268
	N5 Couples, people with children and single adults over 25 sharing a kitchen, bathroom or WC with another household	2,514
	N6 Household containing people with mobility impairment or other special needs living in unsuitable accommodation	2,161
Dwelling amenities and condition	N7 Lacks a bathroom, kitchen or inside WC and household does not have resource to make fit	370
	N8 Subject to major disrepair or unfitness and household does not have resource to make fit	535
Social needs	N9 Harassment or threats of harassment from neighbours or others living in the vicinity which cannot be resolved except through a move	1,072
<b>Total no. households in need (with one or more housing needs)</b> Note this is <u>not</u> the sum of the factors listed above because households can experience more than one of these needs		<b>13,631</b>
Total Households		97,728
<b>% households in need</b>		<b>13.9%</b>

**Note:** A household may have more than one housing need.

Source: 2018 Household Survey

## Total current housing need summary

- C.10 Having established the scale of need in Step 1.1, total current housing need from existing households across the Borough and who cannot afford open market is 11,207. The affordability threshold was tested against median property prices and the cost of privately renting in the Borough.
- C.11 Step 1.2 then considers those households who can afford to privately rent in the Borough but who cannot afford to buy a property on the open market and would like to buy in the Borough.
- C.12 This analysis has been based on ward-level median prices for 2020 derived from Land Registry address-level data and private sector rents was based on lettings reported by Zoopla during 2020 (Table C3). When testing the affordability of private renting, a property is affordable if rents are less than 35% of gross household income.

<b>Ward</b>	<b>Median price (£)</b>	<b>Median Private Rent (Per calendar month)</b>
Barnehurst Ward	£346,500	£1,148
Belvedere Ward	£300,000	£1,148
Bexleyheath Ward	£385,000	£1,148
Blackfen & Lamorbey Ward	£408,000	£1,148
Blendon & Penhill Ward	£425,000	£1,248
Crayford Ward	£303,000	£1,101
Crook Log Ward	£411,250	£1,248
East Wickham Ward	£390,000	£1,248
Erith Ward	£300,000	£1,101
Falconwood & Welling Ward	£398,250	£1,200
Longlands Ward	£425,000	£1,200
Northumberland Heath Ward	£356,000	£1,248
Sidcup Ward	£329,000	£1,148
Slade Green & Northend Ward	£325,000	£1,148
St Mary's & St James Ward	£437,000	£1,200
Thamesmead East Ward	£309,000	£1,101
West Heath Ward	£417,500	£1,300
<b>LB of Bexley</b>	<b>£369,000</b>	<b>£1,200</b>

Source: Data produced by Land Registry © Crown copyright 2020, Zoopla 2020

## Stage 2: Future housing need

- C.13 PPG Paragraph 021 considers the number of newly-arising households likely to need affordable housing. Projections of need should take account of new household formation, the proportion of newly-forming households unable to buy or rent in the market area and an estimation of the number of existing households falling into need. This process should identify the minimum household income required to access median-priced market housing and the proportion of newly-forming households who are unable to access market housing.

### Step 2.1 New household formation (gross per year)

- C.14 The needs analysis blends a range of data together to establish a gross household formation rate. This includes the national gross formation rate of 1.435% based on an average of rates reported in the English Housing Survey 2017/18 to 2019/20 applied to the borough (2,218 each year); past trends in household formation (780 each year); and households expressing a desire to form new households (4,470 each year) to establish a gross formation rate of 2,218 each year.

### Step 2.2 New households requiring affordable housing

- C.15 Analysis of median market prices relative to the income/savings of households who have formed in the past five years suggests that 74.8% could not afford median house prices or private sector rents.
- C.16 Therefore, the total number of newly-forming households who could not afford open market prices or rents across the Borough is calculated to be 1,659 each year.

### Step 2.3 Existing households expected to fall into need

- C.17 An estimate of the number of existing households falling into need each year has been established using the 2018 Household Survey evidence. This indicated that around 190 households moved into affordable/social renting because they fell into housing need in the preceding 5 years. This results in an annualised figure of 38.

### Step 2.4 Total newly arising housing need (gross per year)

- C.18 Total newly arising need is calculated to be 1,697 households each year across the Borough.

## Stage 3: Affordable housing supply

- C.19 The needs assessment model reviews the supply of affordable units, taking into account how many households in need are already in affordable accommodation, stock surpluses, committed supply of new affordable dwellings and dwellings being taken out of management (for instance pending demolition or being used for decanting).

### Step 3.1 Affordable dwellings occupied by households in need

- C.20 This is an important consideration in establishing the net levels of housing need as the movement of these households within affordable housing will have a nil effect in terms of housing need (source: Strategic Housing Market Assessment Guidance (CLG, August 2007).
- C.21 A total of 3,968 households are current occupiers of affordable housing in need. Although the movement of these households within affordable housing will have a nil effect in terms of housing need (i.e. they already live in affordable housing), the types of property they would 'free up' if they moved is considered in modelling.

### Step 3.2 Surplus stock

- C.22 A proportion of vacant properties are needed to allow households to move within housing stock. Across the social rented sector, this proportion is generally recognised as being 2%. Stock above this proportion is usually assumed to be surplus stock. Modelling assumes no surplus social rented stock across the Borough of Bexley.

### Step 3.3 Committed supply of new affordable units

- C.23 The model assumes a committed supply of 830 affordable dwellings over the next 5 years. This is based the actual delivery reported in MHCLG Table 1011C of 764 dwellings or 153 each year which is multiplied by 5 to estimate annual delivery of 765 over the next 5 years.

### Step 3.4 Units to be taken out of management

- C.24 The model assumes there will be no social rented units taken out of management over the next five years.

### Step 3.5 Total affordable housing stock available

- C.25 It is assumed that there are 4,733 affordable dwellings available over the five-year period arising from households moving within the stock (3,968 from movement within the stock and 765 committed new build).

### Step 3.6 Annual supply of social re-lets

- C.26 The needs model considers the annual supply of social re-lets. Borough-level data on lettings is available from CORE and this has been analysed for the three year period 2017/18 to 2019/20 Analysis suggests that there is an annual average of 587 social/affordable rented dwellings let.

### Step 3.7 Annual supply of intermediate re-lets/sales

- C.27 There are an estimated 1,123 units of intermediate tenure dwellings across the borough. Analysis assumes that 5% of dwellings are relet/sold which equates to 56 each year.

## Summary of Stage 3

- C.28 Overall, the model assumes a total affordable housing stock availability of 4,733 dwellings and an annual supply of 643 affordable/social rented lettings and intermediate tenure sales.

## Overview

- C.29 Analysis has carefully considered how housing need is arising within the Borough of Bexley by identifying existing households in need (and who cannot afford market solutions), newly-forming households in need and existing households likely to fall into need.
- C.30 This has been reconciled with the supply of affordable dwellings which considers location, size and designation (i.e. for general needs or older person). Based on the CLG modelling process, analysis suggests that there is an overall annual net imbalance of 1,374 dwellings. This compares with 965 dwellings in the 2020 SHMA update. This increase is principally due to an increase in local house prices and rents and a reduction in the number of affordable lettings coming available.
- C.31 Stage 4 brings together the individual components of the needs assessment to establish the total net annual shortfall. This is also broken down by property size.

## Stage 4: Annual Housing Need

### Step 4.1 Total backlog need

- C.32 Step 4.1 is the total backlog need which is derived from the number of households in Step 1.1 minus total affordable housing stock available (Step 3.5). The total backlog need is 6,474.

### Steps 4.2 to 4.6

- C.33 Step 4.2 is a quota to reduce the total backlog need which is assumed to be 5% each year so that the backlog need is addressed over a twenty year period.
- C.34 Step 4.3 is the annual backlog reduction based on Step 4.2 (324 each year).
- C.35 Step 4.4 is a summary of newly-arising need from both newly forming households and existing households falling into need (1,697 each year).
- C.36 Step 4.5 is the total annual affordable need based on Steps 4.3 and 4.4 (2,021 each year).
- C.37 Step 4.6 is the annual social rented/intermediate tenure capacity based on Step 3.8 (643 each year).

### Total net imbalance

- C.38 Table C4 summarises the overall annual net affordable housing requirements for the London Borough of Bexley by designation (general needs and older person) and property size.



<b>Table C4 Net annual affordable housing imbalance by property size and designation 2018/19 to 2022/23</b>			
<b>Designation</b>	<b>No. Beds</b>	<b>%</b>	<b>Number</b>
General Needs	1	17.1	236
	2	59.3	816
	3	17.0	235
	4	4.2	58
	5	0.8	11
Older person	1	1.1	16
	2	0.2	3
	3	0.2	3
<b>Total</b>		<b>100.0</b>	<b>1378</b>

Sources: 2018 Household Survey; RSL CORE Lettings and Sales

Data subject to rounding errors

## Technical Appendix D: Monitoring and updating

### A framework for updating the housing needs model and assessment of affordable housing requirements

#### Introduction

- D.1 Having invested considerable resources in obtaining an excellent range of primary and secondary data, it is vital that this information be used to the maximum effect and updated on a regular basis. The purpose of this appendix is to establish a framework for updating the housing needs model and affordable housing requirements. In addition, it recommends the regular monitoring and review of housing market activity and regular reflections on the wider strategic context.

#### Updating of baseline housing needs and affordable housing requirements

- D.2 A baseline assessment of housing need across Bexley has been derived from the 2018 Household Survey. This information should be taken as a baseline from which annual reviews of key aspects of the model proceed. It is recommended that the baseline information has a shelf-life of three to five years (with a recommended refresh of household information after 2023 through primary surveying).
- D.3 Key elements of the needs assessment model can be readily updated on an annual basis to reflect:
- changes in house prices and rental costs;
  - capacity of the social rented sector;
  - availability of intermediate tenure housing.

#### Changes in house prices and rental costs

- D.4 It is recommended that the annual purchase of address-level house prices to complement the existing dataset continues. This will result in an annual refresh of house price data by survey area and provide an indication of changing lower quartile prices. In turn, these can be applied to **Step 1.4** of the needs assessment model which considers the extent to which households in need can afford open market prices. As part of this analysis, updated information on private rented sector rents needs to be secured. Several websites can provide a snapshot of private rents and help inform this element of the update.
- D.5 Median prices and private sector rents should also be compared with the income profile of newly-forming households at **Step 2.2** of the needs assessment model.

### Capacity of the social rented sector

- D.6 The capacity of the social rented sector needs to be reviewed annually using RP CORE lettings data (**Step 3.6**). Annual Borough-level updates are available from MHCLG.
- D.7 The capacity of the social rented sector is based on the number of lettings to households from within the local authority district who were previously living in (non-social rented or intermediate) tenure.

### Availability of intermediate tenure housing

- D.8 CORE sales data can identify the availability of intermediate tenure housing (**Step 3.7**). Annual Borough-level updates are available from MHCLG.

### Annual adjustments to affordable requirements

- D.9 Datasets can be provided from which annual reviews of affordable requirements can proceed. This will point to any adjustment in net requirements by survey area, designation and property size.

### Updating of contextual information

- D.10 This report has presented a range of contextual information relating to the economy, demography (including population projections and migration) and dwelling stock. This information should be updated where possible and in particular progression with economic growth and diversification should be carefully monitored.

### Reflections on the general strategic context and emerging issues

- D.11 As part of its strategic housing function, all LAs need to understand the general strategic housing market context and respond to emerging issues. Given the dynamic nature of housing markets, the central and local government policy agenda and bidding for resources, any update of housing needs must be positioned within a wider strategic context.
- D.12 Ongoing stakeholder consultation and engagement with local communities is also vital to maintain up-to-date intelligence on housing market issues.

## Concluding comments

- D.13 It is vital that mechanisms are in place to derive robust, credible and defensible estimates of housing need and affordable requirements across Bexley. We believe that this study provides a robust evidence base which has the capacity to be updated.
- D.14 Having established a baseline position on affordable housing and advice on open market provision to reflect aspirations, it is essential that housing market activity is regularly monitored. This is highly relevant given current housing market uncertainty. A range of methods have been suggested to ensure that housing need and affordability modelling is revised on an annual basis. Annual reviews should also take into account the changing strategic context and impact on housing market activity.

## Technical Appendix E: Stakeholder survey

E.1 Stakeholders were invited to participate in a questionnaire survey aimed at identifying a range of information, including establishing the key perceived housing market issues in Bexley. Stakeholders were asked to respond to any of the questions within the survey that they felt related to their area of knowledge or experience. A total of 19 separate responses to the stakeholder consultation were obtained. 11 responses were from representatives from other borough councils, the Greater London Authority (GLA), London Fire Brigade, a housing association and a developer. A further eight were specialist housing responses from representatives from Bexley Borough Council, Bexley CCG, the NHS, a community trust and a charity. Respondents were asked to answer only the questions that they felt were relevant to their knowledge and experience. This is a qualitative summary of the views expressed by stakeholders responding to the online survey.

### Priorities

E.2 Stakeholders were asked to rank a range of housing priorities as high, medium or low, their responses are summarised in Table E1.

<b>Proposed priorities (base number of respondents in brackets)</b>	<b>Low</b>	<b>Medium</b>	<b>High</b>
Building homes to buy on the open market (10)	10%	40%	50%
Building affordable homes to rent (13)	0%	15%	85%
Building affordable homes to buy (shared ownership, shared equity, starter homes, rent to buy) (12)	0%	25%	75%
Building executive homes (8)	62%	38%	0%
Building properties designed for older people (10)	10%	30%	60%
Building properties designed for people with specialist needs (11)	0%	36%	64%
Improving the quality of existing stock (11)	0%	55%	45%
Encouraging and enabling self-build (10)	50%	50%	0%

E.3 Building affordable homes to rent and building affordable homes to buy were ranked as the highest priorities by stakeholders, with 85% and 75% of respondents (respectively) considering these as high priority.

E.4 Building properties designed for people with specialist needs and building properties designed for older people were also ranked highly by stakeholders, with 60% or more of respondents considering these to be high priority.

- E.5 Building properties to buy on the open market and improving the quality of existing stock were considered as medium to high priority by the majority of respondents.
- E.6 The lowest priority was given to encouraging and enabling self-build and building executive homes; over 50% of respondents ranked these as low priority.
- E.7 Stakeholders gave a range of reasons for identifying these priorities, including:
- There is a national housing crisis with issues including need, affordability, demand and quality;
  - London has a well-documented shortage of housing, particularly affordable housing, housing for older people and specialist needs. This is recognised and addressed in the adopted and draft London Plan;
  - At the local level there is high demand, basic affordability issues, demographic trends and increased homelessness. This need is evidenced through the government's new housing need methodology which indicates 1,700 units per annum for Bexley;
  - The 2014 South East London SHMA identified that 70% of the total requirement for new homes in the region (Boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark) for 2011-31 was for affordable housing. With increasing house prices and rents, alongside stagnant incomes, it is likely that affordable housing need has increased. This trend was also identified in the London-wide SHMA produced by the GLA to inform the draft London Plan;
  - Improved quality affordable homes are needed, including changing the perception of some of the estates;
- E.8 Specialist housing stakeholders gave the following reasons:
- Specialist housing for adults and children with physical disabilities are in short supply but high demand;
  - There are many people with mental health problems who need good quality support and accommodation in the community, assisting them to live as independently as possible; and
  - Need to comply with the Transforming Care Programme (TCP) agenda, **Building the Right Support**.
- E.9 Asked what other key housing priorities there are in Bexley, stakeholders identified the following, in addition to those above:
- Building homes to rent on the open market;
  - Providing family-sized housing through protecting existing accommodation and seeking a mix of housing sizes;
  - The power of the housing market to drive physical regeneration, e.g. new environments and communities in north Bexley to optimise its potential, including transport links;

- The possibility of new modular homes;
- Providing supported accommodation for care leavers and young people with additional needs and vulnerabilities;
- Better liaison with housing associations regarding current adapted properties (database); and
- Linking housing with appropriate support from statutory services and the third sector.

### The current and future housing market in Bexley and housing market drivers

- E.10 Stakeholders were asked whether they are aware of employees who travel to work in Bexley from outside the Borough. Several respondents were aware of people commuting into the area for work; high housing costs were considered to be a factor, although choice and the desire to separate work and home were also mentioned. When asked whether they thought that employees who live outside of the Borough would move to Bexley if suitable housing was made available, two respondents said yes and two said no. Existing ties, family, friends and schooling were highlighted in addition to travel time and cost.
- E.11 Stakeholders were asked to identify what they perceive to be the main drivers of housing demand in Bexley. Drivers identified included:
- Relative affordability, with Bexley being considered good value for money compared with other London Boroughs;
  - Transport links and accessibility, with quick travel into London;
  - Population growth, with growing demand; and
  - Historic shortfall in housebuilding.

### Open-market housing: owner-occupied and private rental

- E.12 Asked what they considered the current limitations of the housing market to be across the Borough of Bexley, stakeholders mentioned a lack of sites coming forward and complicated land assembly, combined with landowner aspirations being unrealistic. A need to change perceptions of the north of the Borough (including Thamesmead) being less attractive than the south was noted, along with a need to provide more mixed communities. Another stakeholder stated that there is insufficient quantity and variety of housing stock, with a predominance of suburban style accommodation that is not appealing or suitable to many segments of society.
- E.13 With specific reference to specialist housing provision, limitations were identified as a lack of stock, lack of good quality specialist housing and affordability issues.
- E.14 In terms of demand, one stakeholder reported that there is demand for all types of housing in the Borough, in particular for affordable family housing and low-cost home ownership initiatives for first-time buyers. It was noted that there is ‘**a fair amount**’ of underoccupancy in the housing stock that was transferred to

registered providers in the late 1990s; it was suggested that this stock could potentially be used as part of the solution to meeting demand for family housing. One of the specialist housing respondents noted that people with fewer resources are unable to drive demand.

- E.15 Stakeholders were asked for their views on house price and rental price trends in the survey area, including the impact of changes in mortgage finances. It was noted that Bexley remains relatively more affordable than many of the neighbouring London Boroughs, being '**relatively good value**' and a place where people '**can get more for their money**'. However, increases in house prices and rents were reported and predicted, including the impact of Cross Rail on areas such as Abbey Wood.
- E.16 There was very limited feedback from stakeholders regarding the private rented sector (PRS) in Bexley. One respondent acknowledged that changes in the economy and welfare have impacted the PRS in Bexley, as they have across the capital; however they noted that Bexley is less affected by overseas property developers than many other parts of London.
- E.17 Affordability was generally acknowledged to be a problem across the Borough area, '**areas that used to be very affordable are no longer so**'. One stakeholder identified that in terms of home ownership, affordability is more of an issue in the south of the Borough.
- E.18 In terms of anti-social behaviour (ASB), this was acknowledged to be a problem by two stakeholders. One noted that this has historically been an issue on some estates in the north of the Borough, negatively impacting the reputation of the area.

### New housing provision

- E.19 It was reported that there have been around 350 dwelling completions per year across the Borough in the last few years (at the time of drafting the 2018 SHMA). Key areas for new build development were identified as including regeneration activities in the north of the Borough, specifically mentioned were the Thamesmead Estates and areas such as Erith Park and Arthur Street estate regeneration.
- E.20 Respondents considered that demand for new development is strong across the Borough, with transport links and market perception being acknowledged as important factors. Key areas of demand for new development were identified as the north of the Borough (due to affordability), Sidcup and Welling.
- E.21 In terms of the demand profile, strong demand for low-cost home ownership products was mentioned by one stakeholder. They noted that the rents in the private rented sector are lower than neighbouring Boroughs, but travel costs are higher for those working in central London. As a result, shared ownership often represents a better option than private renting.
- E.22 Demand for new-build housing was considered to come from both households currently living within Bexley and households seeking to move to the area from elsewhere. Demand for rented accommodation was considered to be predominantly from within the Borough.



- E.23 Stakeholders were asked where they consider new housing should be built. One respondent felt that new homes should be built **‘throughout the Borough’**. Another respondent stated that they agreed with the areas identified in the Growth Strategy, including Erith, Thamesmead and Sidcup. Another respondent noted that Bexley has distinct areas: Erith, Thamesmead, Belvedere, Slade Green, Bexleyheath and Crayford. They felt that there is a need to assess the requirements in each area and also to consider transport infrastructure when planning new developments. The potential extension of the Elizabeth Line was mentioned in this context. It was also suggested that there may be areas of industrial land where a mix of light industry and housing development would be appropriate.
- E.24 In terms of the types of new housing that should be built within the Borough of Bexley, stakeholders suggested the following:
- All housing types, with a high proportion of affordable accommodation;
  - A range of **‘genuinely affordable’** housing, including rent and sale options of different sizes;
  - Rented housing which could be used to allow under-occupiers to downsize – flatted schemes in small blocks;
  - Family-sized housing;
  - Outright market sale;
  - Other specialist housing; and
  - Properties for rental via the third sector for people with particular needs such as mental health.
- E.25 A few of the stakeholders identified their commitment to the development of new housing within the Borough. This included strategic stakeholders who are keen to support an increase in housing supply generally within London, particularly affordable housing. One housing association representative identified Bexley as one of the organisation’s *‘key’* Boroughs; they commented that the Borough is relatively affordable for home ownership and there is strong demand for affordable rented homes. There was limited current development taking place amongst the stakeholders. One housing association reported that they have future plans to regenerate some of their existing estates.
- E.26 Barriers to new development reported by stakeholders include:
- Viability, as building costs are similar to other Boroughs but values are lower. This has implications for delivering affordable housing as part of mixed tenure schemes, as cross-subsidy is reduced;
  - Land availability;
  - Complicated site assembly;
  - Unrealistic landowner aspirations; and
  - Need for improved transport and other infrastructure requirements such as schools.

- E.27 In terms of the future, one stakeholder envisages the new-build dwelling market growing in the short- to medium-term; however, they highlighted the need for infrastructure to be in place to support development, including transport links. Another stakeholder stated that much depends upon how pro-active the Borough is with the progression of their Growth Strategy.
- E.28 In terms of the key messages in the SHMA relating to housing markets, respondents made the following points:
- There is unmet housing need in all sectors which needs to be addressed;
  - There is a need for a range of good quality housing, maximising density and affordable housing provision;
  - The Growth Strategy aspirations must be fully embraced;
  - Interventions are required to bring forward sites for development;
  - Regarding the PRS, there is a need for rents to be affordable and landlords to be reasonable;
  - There is a need for the rental market to be well-regulated to ensure there are no rogue landlords; and
  - One stakeholder reported that Greenwich is currently working in partnership with Bexley, the GLA and TfL to develop an Opportunity Area Planning Framework for the Thamesmead and Abbey Wood Area. The study should reflect that functional housing market areas often do not align with Borough boundaries.

### Affordable housing

- E.29 The stakeholder survey included a number of registered providers and housing associations who work within Bexley. However, only one provided information regarding their stock and for confidentiality reasons it is not appropriate to report the details of their response. However, there is a range of affordable housing accommodation within the Borough, with new schemes being built to the London Housing Design Guide standards. Site availability was mentioned as a barrier to new development in the area. In addition, the reductions in rental income imposed by the government in July 2015 were acknowledged to have had an impact on the number and type of affordable housing that has been developed since. However, the respondent also felt that the reinstated rent settlement (Consumer Price Index plus 1% from 2020) will encourage organisations to develop further social housing in the future but depending on site availability. Shared ownership was identified as a preferred affordable housing product, predominantly for singles, couples and some families. The south of the Borough was again identified as a location of choice. No Black and Minority Ethnic (BME)-related issues were identified, nor any ASB problems.
- E.30 In terms of key messages for the Strategic Housing Market Assessment relating to affordable housing, it was noted that there needs to be an increase in affordable housing.

## Specialist housing

- E.31 Several of the stakeholder survey respondents are directly involved in the specialist housing sector. They work with a range of client groups including: older people, people with physical disabilities, people with learning disabilities, people with mental health problems, the Transforming Care Programme (TCP) cohort (mental health with learning difficulties, MH with LD), people with substance misuse issues and care leavers.
- E.32 Specialist housing stakeholders were asked to provide information on the accommodation that is currently available to these client groups. The feedback included:
- Some people, including those with mental health problems, can live in their own homes but cannot afford their own property so the Council is involved in arranging appropriate housing.
  - People with learning disabilities, the TCP cohort (MH with LD) and physical disabilities – Supported Living and residential homes in the Borough, but a lack of local availability often results in people being placed out of Borough.
  - People with substance misuse issues – one stakeholder noted that where service users have completed residential treatment some go on to Stage Three housing, but there is no provision of this type of accommodation in Bexley. Another respondent stated that service users who have addiction issues do not qualify under statutory housing legislation unless they have co-existing issues; many are therefore sofa-surfing or living in accommodation that is unsuitable.
  - Care leavers – a lack of supported accommodation for this group locally was reported. One stakeholder stated that accommodation provision is needed for these young people post-25 when the leaving care service ends its support. Greater development of support and accommodation is needed under the JHA provision / Southwark judgement.
- E.33 Stakeholders were asked whether they felt that there is enough accommodation for these client groups in terms of current need (next five years) and the longer term (2023-2034). One respondent felt that there was a need for further work to project need and demand. Another suggested that the Insight team could provide projections of need. One of the stakeholders stated that more specialist accommodation and support is needed as some people have to be placed out of Borough on a temporary basis. A lack of supported living properties was reported for clients who have behaviours that challenge themselves and others. In addition, there is a cohort of ageing parent carers who will become unable to continue to provide support in the next five years, resulting in a need to plan accommodation requirements.
- E.34 Over the longer term (2023-2034) respondents indicated the following accommodation needs:
- Sheltered accommodation for those with learning disabilities;
  - Properties that are adapted for physical disabilities;

- Secure tenancies;
  - Very sheltered housing;
  - Service-user specific accommodation;
  - Accommodation for people who may present a risk to others such as MAPPA subjects or people who have a history of drug and alcohol use;
  - Providers able to deal with people who may fluctuate in health and who may present a risk of deterioration.
- E.35 Stakeholders were asked how housing policy changes have affected their ability to deliver services to vulnerable groups over recent years. It was mentioned that a reduction in revenue funding has been an issue. One stakeholder also reiterated that it is increasingly difficult to find suitable accommodation for people with addiction issues who are still in treatment, and for those who have completed treatment and require accommodation. The important roles of housing support workers, clear care plans and communication pathways were highlighted. Another stakeholder noted that a lack of available provision has made it harder to support young people. A third respondent reported a current problem, that Article 4, requiring planning permission for HMOs, is deterring care providers from developing within the Borough. A further respondent expressed the view that pressure is more about available resources than changes in housing policy.
- E.36 Asked about areas of high and low demand for specialist housing, one stakeholder reported that the majority of service users accessing treatment live in the north of the Borough. However, following treatment they may feel that their chances of continuing recovery are better in another part of the Borough, within a different environment. Another stakeholder from the specialist sector stated that, as these groups are vulnerable, demand is away from the large estates of social housing in the north of the Borough. They identified that adapted properties for CB and PD are the main demand.
- E.37 In terms of changes in client groups, one respondent reported that there are more vulnerable residents in the affordable rented sector overall, with a range of varying needs. Another respondent mentioned a greater awareness of domestic abuse, drug and alcohol use and people with chaotic lifestyles.
- E.38 Barriers to the development of further supported housing and/or support services were identified as including:
- A lack of funding;
  - A need for expertise in managing and supporting residents, including support in maintaining their home; and
  - A need for on-site/24-hour support (a lack of out-of-hours support available).
- E.39 In terms of anti-social behaviour in the supported housing sector, one respondent confirmed that ASB can be a problem. Another stated that their clients living in general needs housing report levels of ASB directed towards them. A third stakeholder commented that ASB can be a problem and may

create additional pressures for people with mental health problems who may experience abuse and stigma.

- E.40 Stakeholders were asked about their biggest housing stock shortages for independent living. One stakeholder reported a shortage of adapted flats and sheltered housing for people with learning disabilities (LD) with provision on-site for support. They noted that the location of stock can be a factor, as it is not preferable to move LD clients away from their existing community and support networks and their familiar transport links. Another stakeholder reported a lack of accommodation for mental health needs when combined with drug and alcohol use. A third stakeholder mentioned the availability of 'downsizer' homes for elderly residents, commenting that many would move into a smaller home in the right location if accommodation was available – freeing up larger homes for family use.
- E.41 One stakeholder responded to the survey question asking about the key issues regarding the physical adaptation of properties. They commented on the fact that sometimes properties are suitable but access to them often is not, indicating a need for more ground floor accommodation with wheelchair access. They also noted a need for the provision of assistive technology as a built-in feature.
- E.42 In terms of additional comments and key messages for the Strategic Housing Market Assessment in relation to supported living, independent living and older people's housing, one stakeholder reported that in the past they have been able to access one-bedroom accommodation for people completing residential rehab; however experience has shown that moving from a residential setting into lone accommodation can be detrimental to ongoing recovery, with little in the way of financial assistance to help someone set up a home. It is a big step when a person is moving from a supportive structured environment into independent living. They recommended that stage three housing offers a home with others who have also completed treatment, where abstinence from substance use is the norm and where people feel safe. This enables people to make the transition to independent housing in a safe and measured way. The stakeholder reported that in other London Boroughs people can remain in stage three housing for up to two years before accessing independent social housing. Another stakeholder from the specialist housing sector reported that client groups very much want to feed into this consultation and they are arranging appropriate forums to facilitate this.

## **APPENDIX 8**



Civic Offices, 2 Watling Street, Bexleyheath DA6 7AT

020 8303 7777 developmentcontrol@bexley.gov.uk www.bexley.gov.uk

Application for Planning Permission.  
Town and Country Planning Act 1990

**Publication of applications on planning authority websites.**

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

**1. Site Address**

Number	<input type="text" value="28"/>
Suffix	<input type="text"/>
Property name	<input type="text"/>
Address line 1	<input type="text" value="Blackfen Road"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Town/city	<input type="text" value="Sidcup"/>
Postcode	<input type="text" value="DA15 8SN"/>

Description of site location must be completed if postcode is not known:

Easting (x)	<input type="text" value="545236"/>
Northing (y)	<input type="text" value="174494"/>
Description	<input type="text"/>

**2. Applicant Details**

Title	<input type="text"/>
First name	<input type="text"/>
Surname	<input type="text" value="Blackfen 2 Ltd"/>
Company name	<input type="text"/>
Address line 1	<input type="text" value="28, Blackfen Road"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Town/city	<input type="text" value="Sidcup"/>
Country	<input type="text"/>

## 2. Applicant Details

Postcode

Are you an agent acting on behalf of the applicant?

Yes  No

Primary number

Secondary number

Fax number

Email address

## 3. Agent Details

Title

First name

Surname

Company name

Address line 1

Address line 2

Address line 3

Town/city

Country

Postcode

Primary number

Secondary number

Fax number

Email

## 4. Site Area

What is the measurement of the site area?  
(numeric characters only).

Unit

## 5. Site Information

### Title number(s)

Please add the title number(s) for the existing building(s) on the site. If the site has no title numbers, please enter "Unregistered"

Title Number	Title

### Energy Performance Certificate

Do any of the buildings on the application site have an Energy Performance Certificate (EPC)?

Yes  No

### Public/Private Ownership



## 5. Site Information

What is the current ownership status of the site?

Public  Private  Mixed

## 6. Description of the Proposal

Please note in regard to:

- Fire Statements - From 1 August 2021, planning applications for buildings of over 18 metres (or 7 stories) tall containing more than one dwelling will require a 'Fire Statement' for the application to be considered valid. There are some exemptions. View government planning guidance on fire statements or access the fire statement template and guidance.
- Permission In Principle - If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.
- Public Service Infrastructure - From 1 August 2021, applications for certain public service infrastructure developments will be eligible for faster determination timeframes. See help for further details or view government planning guidance on determination periods.

Description

Please describe details of the proposed development or works including any change of use.

Alternative proposal to approved application no. 20/02584/FUL comprising of 5 new flats within existing envelope of this

Has the work or change of use already started?

Yes  No

## 7. Further information about the Proposed Development

Are the proposals eligible for the 'Fast Track Route' based on the affordable housing threshold and other criteria?

Yes  No

Do the proposals cover the whole existing building(s)?

Yes  No

### Current lead Registered Social Landlord (RSL)

If the proposal includes affordable housing, has a Registered Social Landlord been confirmed?  
If the proposal does not include affordable housing, select 'No'.

Yes  No

### Details of building(s)

Please add details for each new separate building(s) being proposed (all fields must be completed). Please only include existing building(s) if they are increasing in height as part of the proposal.

Building reference	New flats
Maximum height (Metres)	8
Number of storeys	2

### Loss of garden land

Will the proposal result in the loss of any residential garden land?

Yes  No

### Projected cost of works

Please provide the estimated total cost of the proposal

Up to £2m

## 8. Vacant Building Credit

Does the proposed development qualify for the vacant building credit?

Yes  No

## 9. Superseded consents

Does this proposal supersede any existing consent(s)?

Yes  No

## 10. Development Dates

Please add the expected commencement and completion dates for all phases of the proposed development.  
If the entire development is to be completed in a single phase, state in the 'Phase Detail' that it covers the 'Entire Development'.

## 10. Development Dates

Phase Detail	Commencement Month	Commencement Year	Completion Month	Completion Year
Entire Development	March	2022	March	2023

## 11. Scheme and Developer Information

### Scheme Name

Does the scheme have a name?  Yes  No

### Developer Information

Has a lead developer been assigned?  Yes  No

## 12. Existing Use

Please describe the current use of the site

Existing dwelling at No.28 Blackfen Road

Is the site currently vacant?  Yes  No

If Yes, please describe the last use of the site

The previous owner vacated property

When did this use end (if known)?  
DD/MM/YYYY

01/09/2020

**Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.**

Land which is known to be contaminated  Yes  No

Land where contamination is suspected for all or part of the site  Yes  No

A proposed use that would be particularly vulnerable to the presence of contamination  Yes  No

## 13. Existing and Proposed Uses

Please add details of the Gross Internal Area (GIA) for all current uses and how this will change based on the proposed development. Details of the floor area for any proposed new uses should also be added.

Following changes to Use Classes on 1 September 2020: The list includes the now revoked Use Classes A1-5, B1, and D1-2 that should not be used in most cases. Also, the list does not include the newly introduced Use Classes E and F1-2. To provide details in relation to these, select 'Other' and specify the use where prompted. View further information on Use Classes. Multiple 'Other' options can be added to cover each individual use. If the 'Other' option is not displayed, please contact our service desk to resolve this.

Use Class	Existing gross internal floor area (square metres)	Gross internal floor area lost (including by change of use) (square metres)	Gross internal floor area gained (including change of use) (square metres)
A1 - Shops	0	0	0
C3 - Dwellinghouses	0	0	292
Total	0	0	292

## 14. Materials

Does the proposed development require any materials to be used externally?  Yes  No

**Please provide a description of existing and proposed materials and finishes to be used externally (including type, colour and name for each material):**

## 14. Materials

Walls	
Description of existing materials and finishes (optional):	N/A
Description of proposed materials and finishes:	Render

Roof	
Description of existing materials and finishes (optional):	N/A
Description of proposed materials and finishes:	Pitched / Tiled

Windows	
Description of existing materials and finishes (optional):	N/A
Description of proposed materials and finishes:	UPVC

Doors	
Description of existing materials and finishes (optional):	N/A
Description of proposed materials and finishes:	UPVC / Aluminium

Are you supplying additional information on submitted plans, drawings or a design and access statement?  Yes  No

If Yes, please state references for the plans, drawings and/or design and access statement

SK001 Site Location Plan  
SK002 Proposed Block Plans  
SK003 Proposed Site Plan  
SK004 Proposed Floor Plans  
SK005 Proposed Elevations  
SK006 Proposed Cycle Enclosure  
SK007 Refuse Enclosure

## 15. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicular access proposed to or from the public highway?  Yes  No

Is a new or altered pedestrian access proposed to or from the public highway?  Yes  No

Are there any new public roads to be provided within the site?  Yes  No

Are there any new public rights of way to be provided within or adjacent to the site?  Yes  No

Do the proposals require any diversions/extinguishments and/or creation of rights of way?  Yes  No

## 16. Vehicle Parking

Does the site have any existing vehicle/cycle parking spaces or will the proposed development add/remove any parking spaces?  Yes  No

Please provide the number of existing and proposed parking spaces.  
Please note that car parking spaces and disabled persons parking spaces should be recorded separately unless its residential off-street parking which should include both.

## 16. Vehicle Parking

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	2	5	3

## 17. Electric vehicle charging points

Do the proposals include electric vehicle charging points and/or hydrogen refuelling facilities?

Yes  No

## 18. Trees and Hedges

Are there trees or hedges on the proposed development site?

Yes  No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

Yes  No

**If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of your local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.**

## 19. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Check the location on the Government's Flood map for planning. You should also refer to national standing advice and your local planning authority requirements for information as necessary.)

Yes  No

**If Yes, you will need to submit a Flood Risk Assessment to consider the risk to the proposed site.**

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

Yes  No

Will the proposal increase the flood risk elsewhere?

Yes  No

**How will surface water be disposed of?**

Sustainable drainage system

Existing water course

Soakaway

Main sewer

Pond/lake

## 20. Biodiversity and Geological Conservation

**Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?**

**To assist in answering this question correctly, please refer to the help text which provides guidance on determining if any important biodiversity or geological conservation features may be present or nearby; and whether they are likely to be affected by the proposals.**

a) Protected and priority species:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

b) Designated sites, important habitats or other biodiversity features:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

## 20. Biodiversity and Geological Conservation

c) Features of geological conservation importance:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

## 21. Open and Protected Space

Will the proposed development result in the loss, gain or change of use of any open space?  Yes  No

Will the proposed development result in the loss, gain or change of use of a site protected with a nature designation?  Yes  No

## 22. Foul Sewage

Please state how foul sewage is to be disposed of:

- Mains Sewer  
 Septic Tank  
 Package Treatment plant  
 Cess Pit  
 Other  
 Unknown

Are you proposing to connect to the existing drainage system?  Yes  No  Unknown

## 23. Water Management

Please state the expected percentage reduction of surface water discharge (for a 1 in 100-year rainfall event) from the proposal

0

Are Green Sustainable Drainage Systems (SuDS) incorporated into the drainage design for the proposal?  Yes  No

Please state the expected internal residential water usage of the proposal (litres per person per day)

0.00

Does the proposal include the harvesting of rainfall?  Yes  No

Does the proposal include re-use of grey water?  Yes  No

## 24. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or trade waste?  Yes  No

## 25. Residential Units

Does this proposal involve the loss or replacement of any self-contained residential units or student accommodation (including those being rebuilt)?  Yes  No

### Residential Units to be lost

Please provide details for each separate type and specification of residential unit being lost or replaced.  
Please enter details for all units being lost or replaced even if there is no net change in number.

## 25. Residential Units

Units Lost											
Unit type	Units	Tenure	GIA	Habitable rooms	Bedrooms	M4(2)	M4(3)(2a)	M4(3)(2b)	Sheltered Accommodation	Older Persons Housing	Garden Land
Detached Home	1	Market for Sale	80	2	3						

Please add details for every unit of communal space to be lost

Does this proposal involve the addition of any self-contained residential units or student accommodation (including those being rebuilt)?  Yes  No

### Residential Units to be added

Please provide details for each separate type and specification of residential unit being provided.

Units Gained											
Unit type	Units	Tenure	GIA	Habitable rooms	Bedrooms	M4(2)	M4(3)(2a)	M4(3)(2b)	Sheltered Accommodation	Older Persons Housing	Garden Land
Flat, Apartment or Maisonette	1	Market for Sale	61	1	2						
Flat, Apartment or Maisonette	1	Market for Sale	70	1	2						
Flat, Apartment or Maisonette	1	Market for Sale	50	1	1						
Flat, Apartment or Maisonette	1	Market for Sale	50	1	1						
Flat, Apartment or Maisonette	1	Market for Sale	61	1	1						

Please add details for every unit of communal space to be added

Who will be the provider of the proposed unit(s)?

Private

Total number of residential units proposed

5

Total residential GIA (Gross Internal Floor Area) lost

80

Total residential GIA (Gross Internal Floor Area) gained

292

## 26. Non-Permanent Dwellings

Please add details of any non-permanent dwellings (if used as main residence e.g. caravans, mobile homes, converted railway carriages, etc...), traveller pitches/plots or houseboat moorings that this proposal seeks to add or remove

## 27. Other Residential Accommodation

Please add details of any non self-contained accommodation, based on the categories in the drop down menu, that this proposal seeks to add, remove or rebuild.

Provision for older people

Please specify the number of proposed rooms, of the types listed below, to be specifically provided for older people

Older persons care home accommodation - Residential care homes (Use Class C2)

0

## 27. Other Residential Accommodation

Older persons supported and specialised accommodation - Hostel (Sui Generis Use)

0

## 28. Waste and recycling provision

Does every unit in this proposal (residential and non-residential) have dedicated internal and external storage space for dry recycling, food waste and residual waste?  Yes  No

## 29. Utilities

### Water and gas connections

Number of new water connections required

5

Number of new gas connections required

5

### Fire safety

Is a fire suppression system proposed?

Yes  No

### Internet connections

Number of residential units to be served by full fibre internet connections

5

Number of non-residential units to be served by full fibre internet connections

0

### Mobile networks

Has consultation with mobile network operators been carried out?

Yes  No

## 30. Environmental Impacts

### Community energy

Will the proposal provide any on-site community-owned energy generation?

Yes  No

### Heat pumps

Will the proposal provide any heat pumps?

Yes  No

### Solar energy

Does the proposal include solar energy of any kind?

Yes  No

### Passive cooling units

Number of proposed residential units with passive cooling

0

### Emissions

NOx total annual emissions (Kilograms)

0.00

Particulate matter (PM) total annual emissions (Kilograms)

0.00

### Greenhouse gas emission reductions

Are the on-site Greenhouse gas emission reductions at least 35% above those set out in Part L of Building Regulations 2013?

Yes  No

### Green Roof

Proposed area of 'Green Roof' to be added (Square metres)

0.00

### Urban Greening Factor

Please enter the Urban Greening Factor score

0.00

### Residential units with electrical heating

### 30. Environmental Impacts

Number of proposed residential units with electrical heating

0

#### Reused/Recycled materials

Percentage of demolition/construction material to be reused/recycled

0

### 31. Employment

Are there any existing employees on the site or will the proposed development increase or decrease the number of employees?

Yes  No

### 32. Hours of Opening

Are Hours of Opening relevant to this proposal?

Yes  No

### 33. Industrial or Commercial Processes and Machinery

Does this proposal involve the carrying out of industrial or commercial activities and processes?

Yes  No

Is the proposal for a waste management development?

Yes  No

**If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make it clear what information it requires on its website**

### 34. Hazardous Substances

Does the proposal involve the use or storage of any hazardous substances?

Yes  No

### 35. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes  No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

- The agent
- The applicant
- Other person

### 36. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes  No

### 37. Authority Employee/Member

**With respect to the Authority, is the applicant and/or agent one of the following:**

- (a) a member of staff**
- (b) an elected member**
- (c) related to a member of staff**
- (d) related to an elected member**

It is an important principle of decision-making that the process is open and transparent.

Yes  No

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

### 38. Ownership Certificates and Agricultural Land Declaration

**CERTIFICATE OF OWNERSHIP - CERTIFICATE A - Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14**



### 38. Ownership Certificates and Agricultural Land Declaration

I certify/The applicant certifies that on the day 21 days before the date of this application nobody except myself/the applicant was the owner\* of any part of the land or building to which the application relates, and that none of the land to which the application relates is, or is part of, an agricultural holding\*\*

\* 'owner' is a person with a freehold interest or leasehold interest with at least 7 years left to run. \*\* 'agricultural holding' has the meaning given by reference to the definition of 'agricultural tenant' in section 65(8) of the Act.

**NOTE:** You should sign Certificate B, C or D, as appropriate, if you are the sole owner of the land or building to which the application relates but the land is, or is part of, an agricultural holding.

Person role

- The applicant  
 The agent

Title

First name

Surname

Declaration date (DD/MM/YYYY)

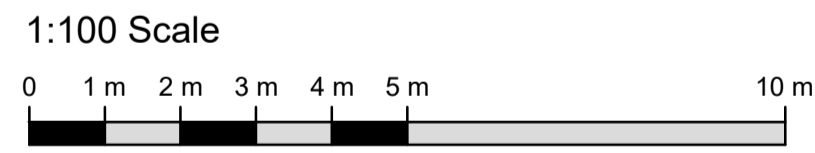
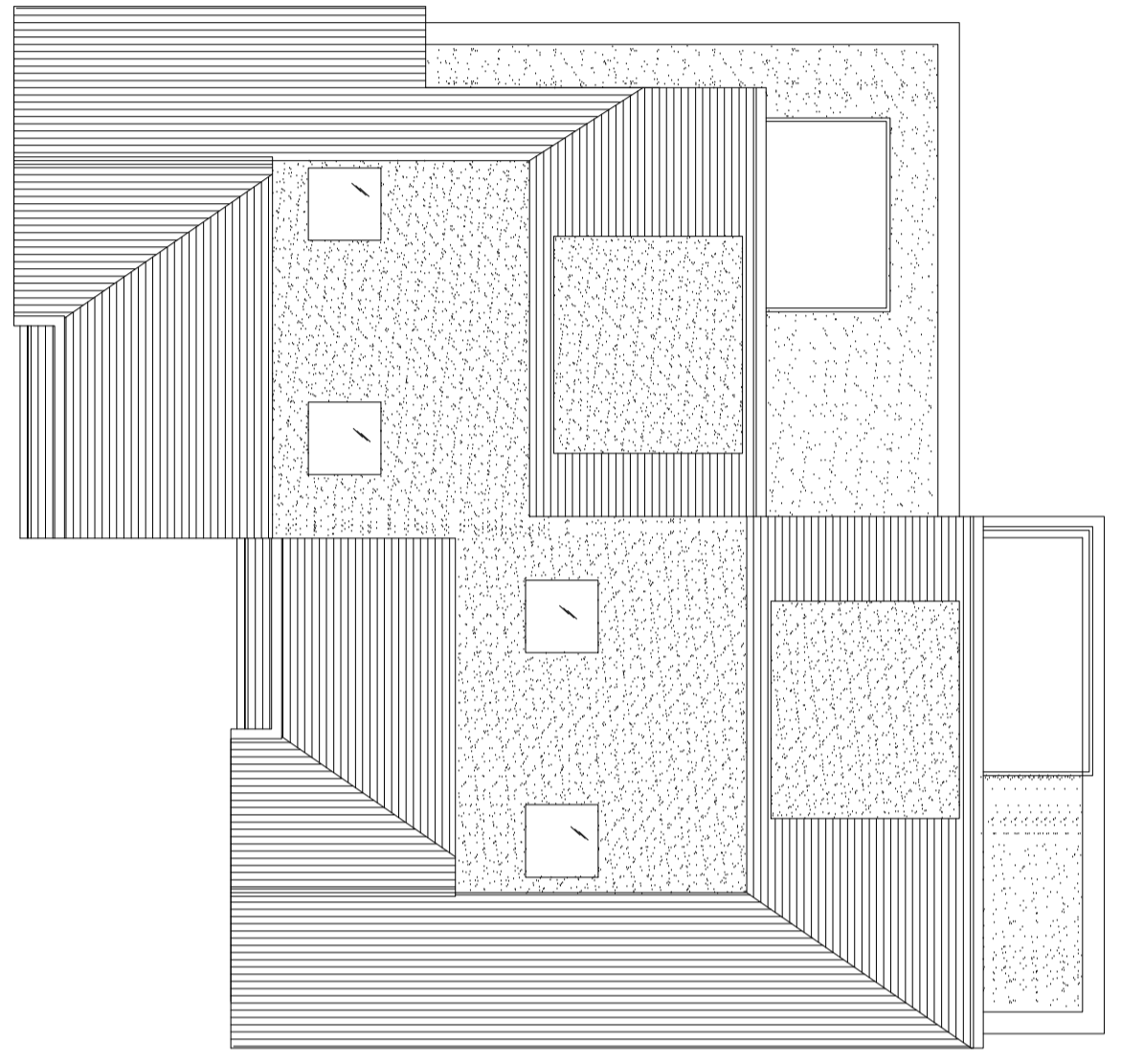
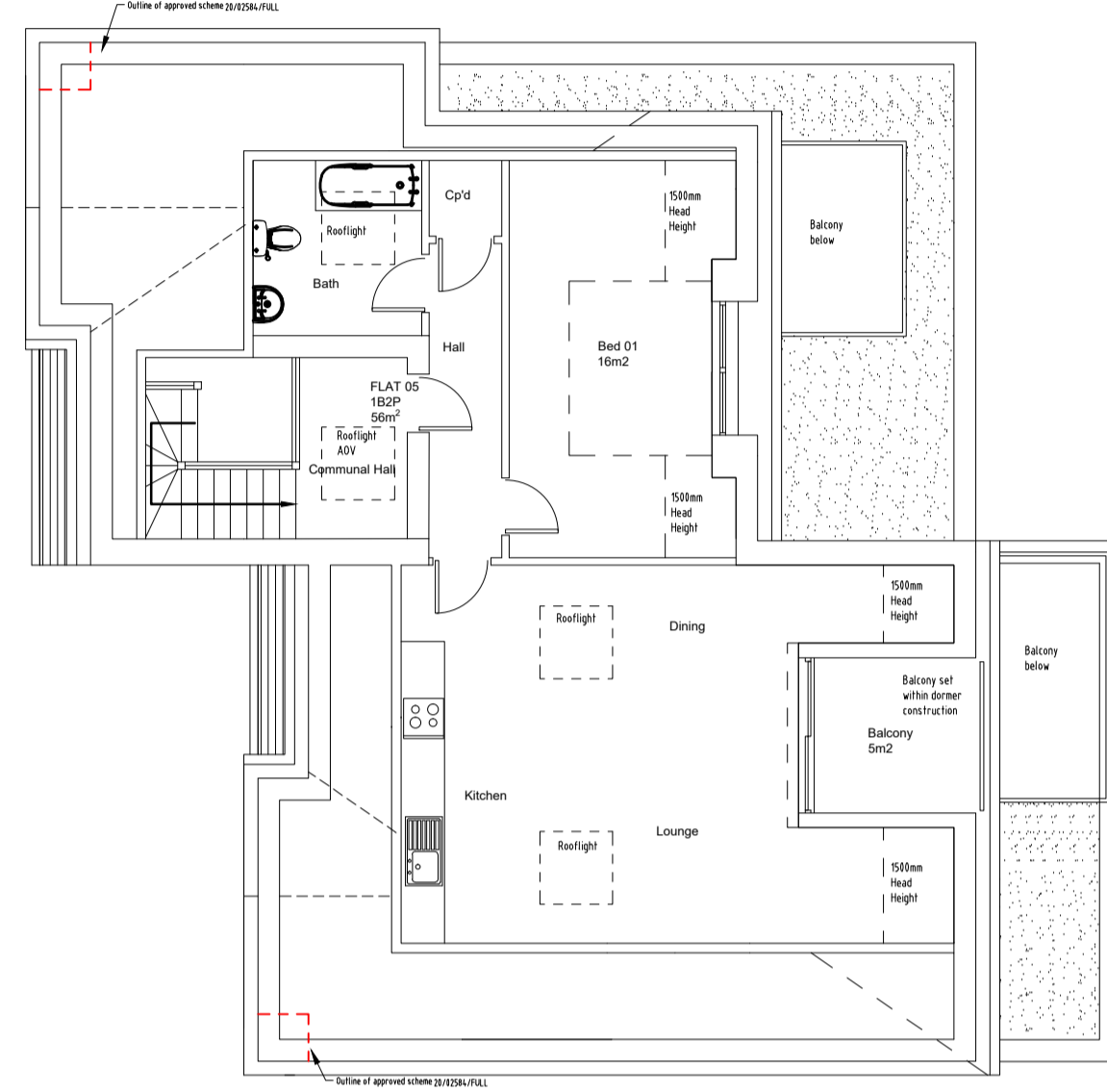
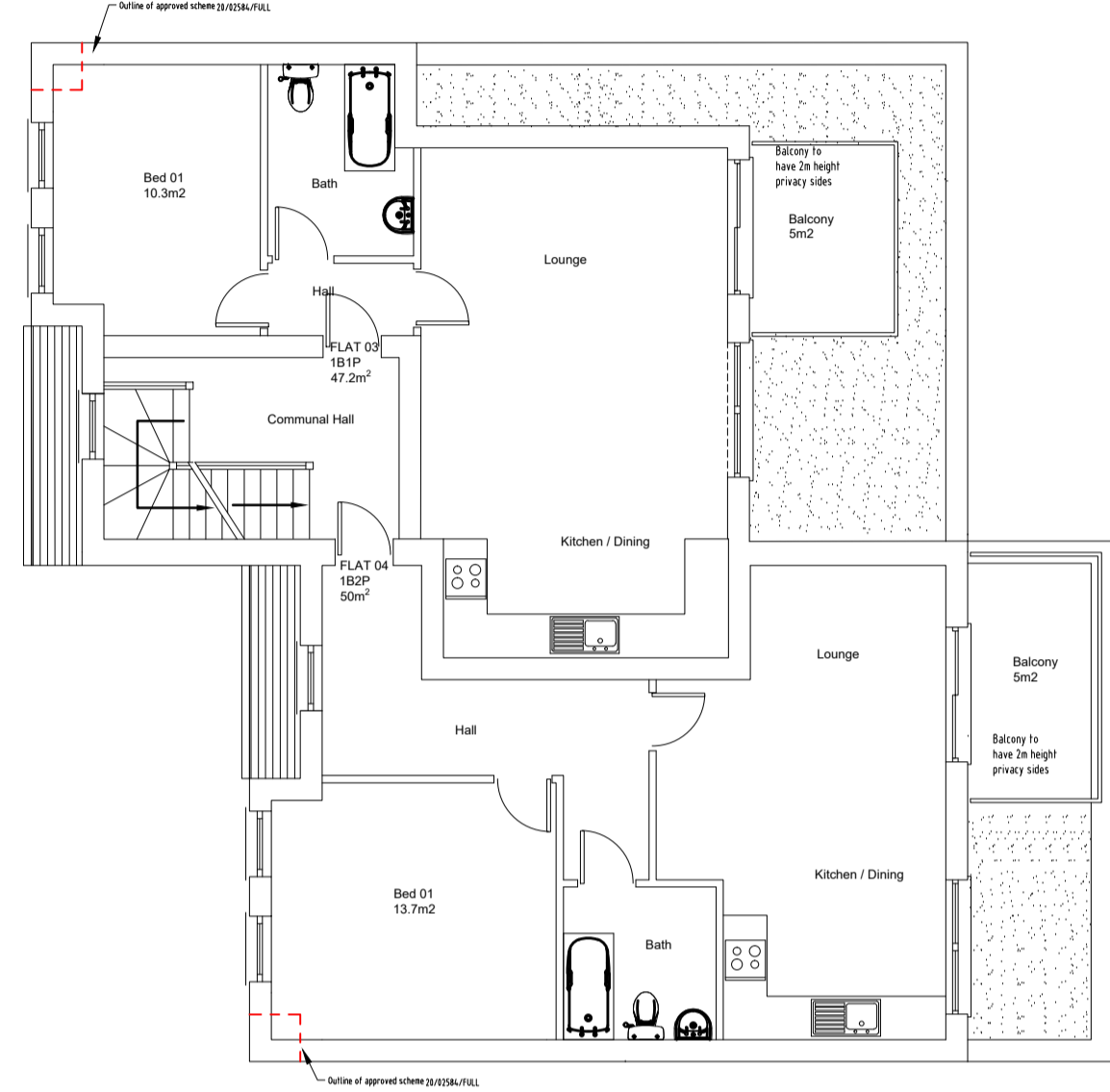
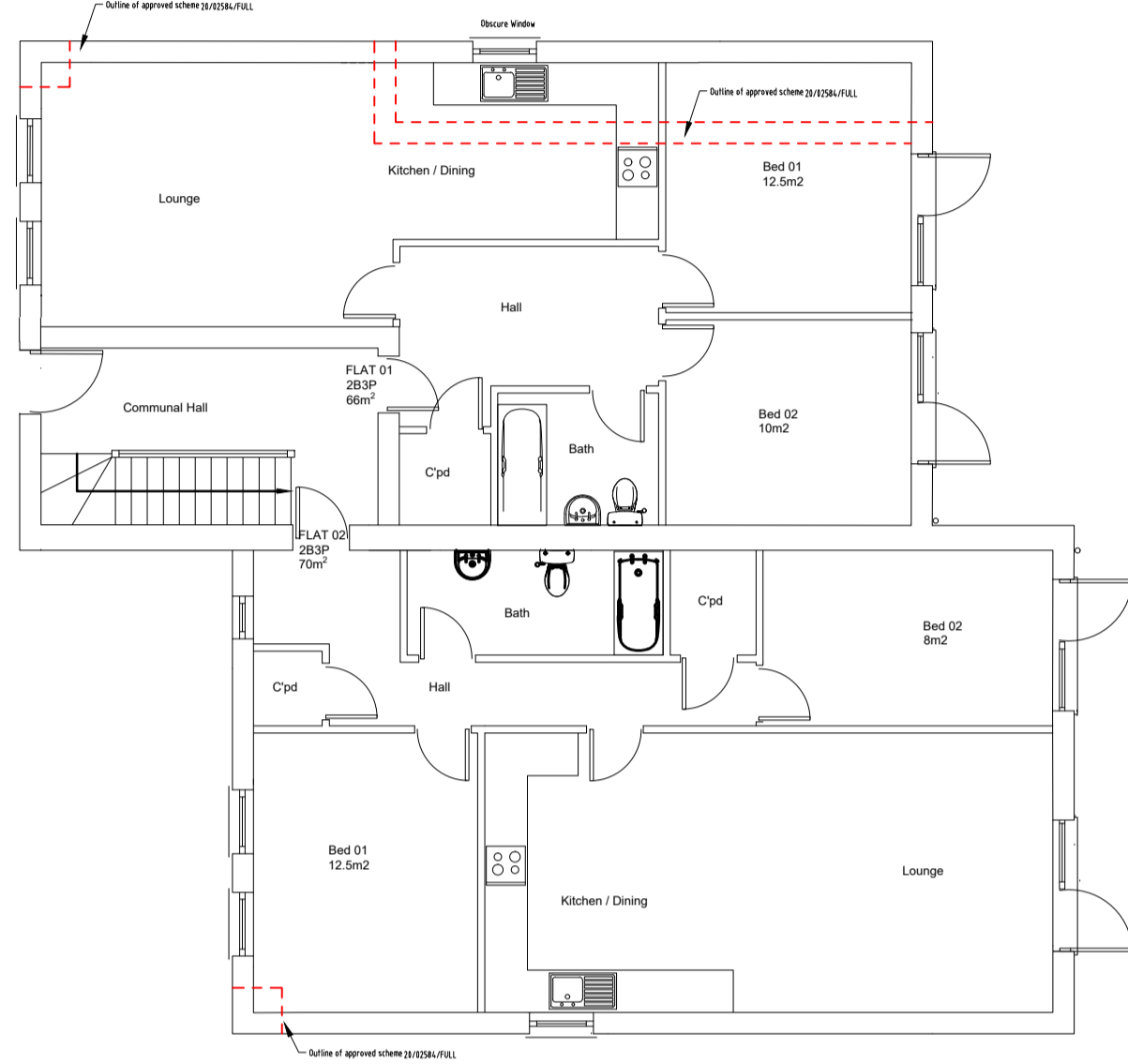
Declaration made

### 39. Declaration

I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Date (cannot be pre-application)

ACCOMMODATION SCHEDULE	
Flat 01 - 2B3P	66m <sup>2</sup>
Flat 02 - 2B4P	70m <sup>2</sup>
Flat 03 - 1B1P	47.2m <sup>2</sup>
Flat 04 - 1B2P	50m <sup>2</sup>
Flat 05 - 1B2P	56m <sup>2</sup>
*All balconies achieve 5m <sup>2</sup>	



London Housing Design Guide Minimum GIA

	Dwelling type (bedrooms/ persons)	Essential GIA (sq.m)
Single storey dwelling	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
Two storey dwelling	2b4p	83
	3b4p	87
	3b5p	96
	4b6p	107
Three storey dwelling	3b5p	102
	4b5p	106
	4b6p	113

For dwellings designed for more than 6 people, at least 10 sq m gross internal area should be added for each additional person.

- H Balcony sized adjusted to suit 5m<sup>2</sup>. June '22
- G Updated to planners comments. June '22
- F Loff flat note changed from Flat 04 to 05. June '22
- E Flat 03 GIA updated. May '22
- D Doors shown to Flat 01 bedrooms. April '22
- C Updated to planners comments. April '22
- B Updated to client comments. Oct '21
- A Updated to client comments. Sept '21

REV	DESCRIPTION	DATE	INT	CHKD

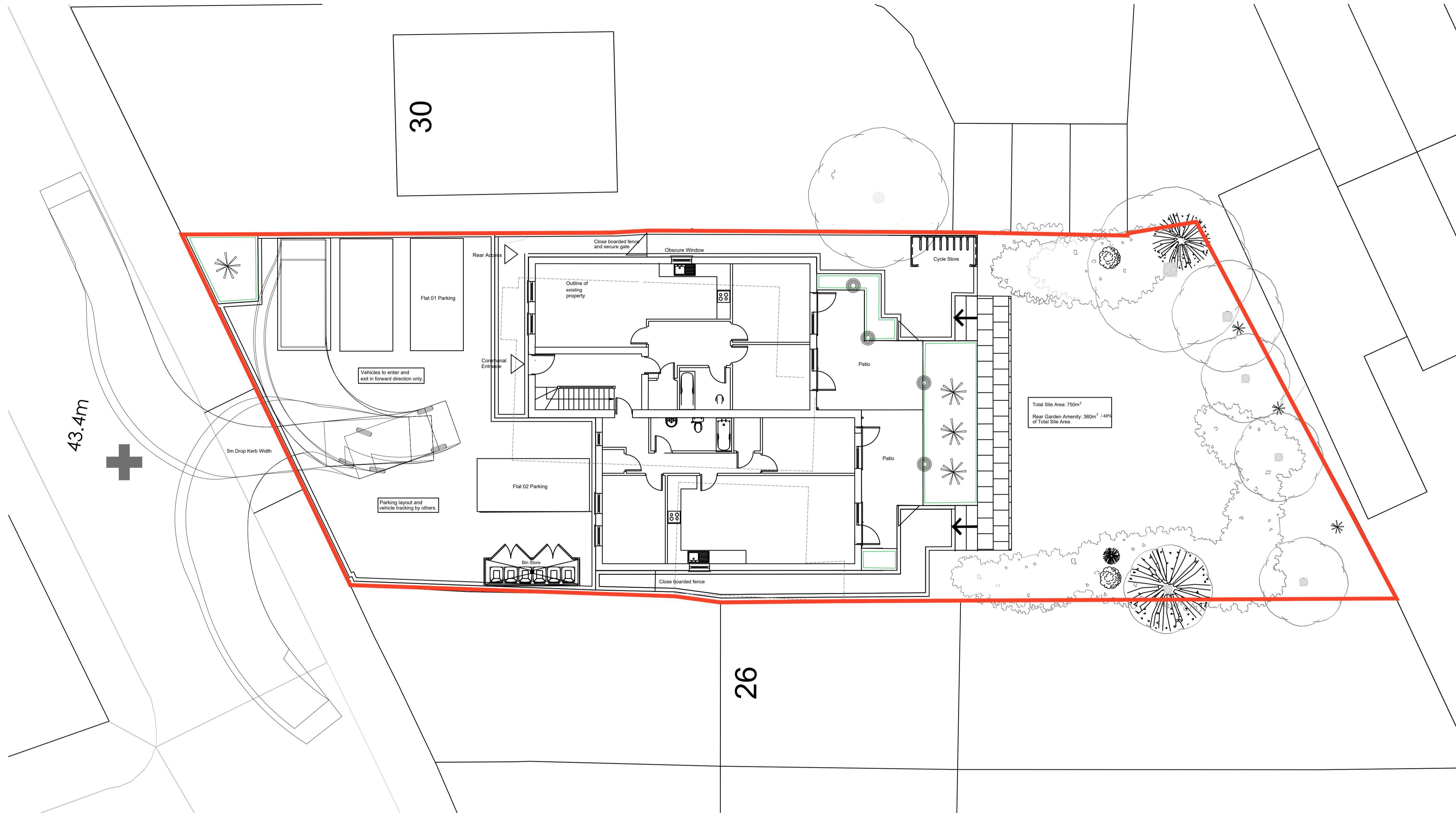
STATUS FOR INFORMATION

Client  
**Blackfen 2 Ltd**

Project  
**28 Blackfen Road, DA15 8SN**

Title  
**Proposed Floor Plans**

Scale	Date	Drawn	Checked
1:100@A1	Sept '21	N/A	N/A
Project No:	Drawing No.	Revision	
2021-138	SK004	H	



- F Updated to planners comments. June '22
- E Tracking & Landscaping added. May '22
- D Updated to client comments. April '22
- C Updated to planners comments. April '22
- B Refuse store updated. Mar '22
- A Updated to client comments. Sept '21

REV	DESCRIPTION	DATE	INT	CHKD
1				

STATUS FOR INFORMATION

Client  
Blackfen 2 Ltd

Project  
28 Blackfen Road, DA15 8SN

Title  
Proposed Site Plan

Scale	Date	Drawn	Checked
1:100@A1	Sept '21	N/A	N/A
Project No:	Drawing No.	Revision	
2021-138	SK003	F	

To: **Blackfen 2 Ltd**  
**c/o Mr Ryan Townrow**  
**RT Drafting Solutions Ltd**  
**277B Main Road**  
**Sidcup**  
**DA14 6QL**

**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)**  
**(ENGLAND) ORDER 2015**

**GRANT OF PERMISSION TO DEVELOP  
LAND SUBJECT TO CONDITIONS**

Reference Code :  
**21/03619/FUL**

**TAKE NOTICE** that Bexley Council, the Local Planning Authority under the Town and Country Planning Acts, **HAS GRANTED PERMISSION** for the development of land situated at :

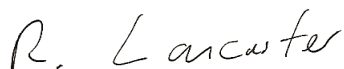
28 Blackfen Road  
Sidcup  
Kent  
DA15 8SN

For Demolition of existing bungalow and erection of a two storey building incorporating two rear dormer extensions with juliet balconies to provide 5 flats comprising 2 x 2 bed and 3 x 1 bed flats with associated parking and amenity space.

Referred to in the application for permission for development received on 28th February 2022.

**SUBJECT TO THE CONDITIONS** as attached.

**Date of Decision: 10th August 2022**



**Head of Development Management**

**CONDITIONS AND REASONS**

- 1 The development hereby permitted shall be begun within 3 years from the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004).

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the: Approved plans S01; S02; received on 28/02/2022; 01 C, 02C, 04 B, 05 B; 1111-2209-CIV-10 P2, 1111-2209-CIV-30 P1, 1111-2209-CIV-50 P1, 1111-2209-CIV-51 P1; SK001; SK002 Rev.C; SK003 Rev.F; SK004 Rev.H; SK005 Rev.E; SK006 Rev.A; SK007 Rev.B; RTOW 559/16 -001 Rev.E; received on 27/05/2022,

Reason: To prevent any unacceptable deviation from the approved plans.

- 3 The development hereby permitted shall only be completed in full accordance with the details of the materials set out in the submitted Materials Schedule [dated 27/05/2022], and there shall be no variations in the use of the materials unless they have previously been agreed in writing with the Council.

Reason: To prevent any unacceptable deviation from the approved plans

- 4 The use of the land for vehicle parking shall not be commenced until the area has been laid out, surfaced, and drained in accordance with details first submitted to, and approved in writing by, the Local Planning Authority and shall be permanently maintained and available for such use thereafter.

Reason: To ensure a satisfactory standard of development and in the interests of highway safety.

- 5 The access to the parking area shall be provided with those parts of 2.4m x 2.4m pedestrian visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.

Reason: In the interests of highway safety

- 6 The development shall be constructed in accordance with the Constriction Management & Logistics Plan (prepared by CMP Construct Limited and dated 31 May 2022).

Reason: In order to ensure that the construction of the development is undertaken in a manner which minimises its' effect on the local environment.

- 7 The development shall only be carried out in accordance with the details submitted within the Drainage Strategy (prepared by RT Drafting Solutions and dated 22nd April 2022).

Reason: To ensure that the site is sustainably drained. These details are required at an early stage to ensure the drainage measures are factored into the build process.

- 8 8. A. The hard landscaping works shall be carried out prior to occupation in accordance with the approved details (dwg no. RTOW 559/16 -001 Rev.E dated 14th March 2022 & Materials Schedule).  
B. The soft landscaping works shall be carried out prior to occupation or in the first seeding season following practical completion (whichever is earlier) in accordance with the approved details.  
C. The management plan shall be implemented in accordance with the approved details.  
D. Any trees or plants which, within a period of 5 years from the carrying out of the soft landscaping works, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species to those originally planted.

Reason: In the interests of privacy and the visual amenities of the area.

- 9 The approved refuse storage arrangements shall be installed before the development is first occupied and shall be permanently maintained thereafter.

Reason: In order to provide adequate refuse storage facilities and in the interests of the visual amenities of the area.

- 10 The approved bicycle parking facilities shall be installed before the development is first occupied and shall be permanently maintained as such thereafter.

Reason: To ensure a satisfactory standard of development and to promote the use of sustainable modes of transport.

- 11 A. Prior to the installation of any glazing or ventilation within the building hereby permitted, details which shall demonstrate that the level of acoustic protection to all habitable rooms will be sufficient to achieve the internal levels specified in BS8233: 2014 shall be submitted to and approved in writing by the Local Planning Authority.  
B. Each residential unit shall not be occupied until such time as the approved measures have been implemented for that unit. The approved measures shall be retained and maintained thereafter in accordance with the manufacturer's recommendations.  
C. Verification that works have been carried out in full accordance with the approved scheme shall be submitted to and approved in writing by the Local Planning Authority within three months of first occupation.

Reason: To protect future occupants of the development from excessive external noise and to ensure that internal noise levels achieve the BS: 8233 noise criteria.

- 12 The parking spaces shown on plan number SK003 Ref.F [Proposed Site Plan] reserved for the Flats 01 and 02 respectively shall be retained solely for the use of these flats shall only be used for the parking of motorised vehicles and shall be available for such use at all times.

Reason: In the interests of residential amenity within the site.

- 13 Prior to the occupation of the development hereby approved, the boundary treatment and glazed screening to the patio areas at ground floor level and balconies at first floor level shall be installed in accordance with plan number SK005 Rev.E [Proposed Elevations and Section] and retained thereafter.

Reason: In the interests of privacy and neighbouring amenity.

## **INFORMATIVES :-**

1 The implementation of this planning permission will require the assignment of a postal number(s). The Council, as the Local Street Naming and Numbering Authority, are responsible for approving new road names, assigning postal numbers and entering the information on the National Land & Property Gazetteer, a national database of address information. An application must be submitted to the Council at the earliest opportunity, to ensure that any new number(s) are assigned before the development is occupied. A fee will be required for this service (see Bexley Council's web site for details or telephone 0203 045 5732).

2 The applicant should be aware that this development is liable for both the Mayoral Community Infrastructure Levy and the London Borough of Bexley's Community Infrastructure Levy (CIL).

Before the implementation of this planning permission someone will need to assume Liability for any CIL Charge for the development. Therefore, the Council's CIL Administration Officer should be contacted at the earliest opportunity, to discuss what is required and to ensure that the correct process is followed.

Contact in the first instance can be made by email to [DevelopmentControl@bexley.gov.uk](mailto:DevelopmentControl@bexley.gov.uk) or by telephone to 020 3045 5912.

Please note: - any failure to follow the correct process can lead to surcharges being applied to any CIL Charge due and subsequent legal proceedings can be taken including the issuing of a CIL Stop Notice.

3 The Council's Drainage team encourages the use of rainwater butt(s) in new developments to allow for the reuse of rainwater for outdoor purposes. The Applicant is encouraged to incorporate this feature prior to the occupation of the development.

### **PLEASE NOTE**

In dealing with this planning application, Bexley Council has worked with the applicant in a positive and proactive manner, in accordance with the requirements of paragraphs 186 & 187 of the National Planning Policy Framework, to seek solutions to problems where practicable. Detailed advice is available in the form of the Council's Development Plan as well as in the Mayor of London's and Bexley Council's Supplementary Planning Documents and Guidance. The Council also offers a full pre-application service that is available to all applicants to assist in formulating their proposals.

### **APPEALS**

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or if granted subject to conditions, then you can appeal to the Secretary of State. More details of the time limits for appeals and how you go about appealing along with Purchase Notices can be found on the following websites:

<https://www.gov.uk/government/organisations/planning-inspectorate>

<https://www.planningportal.co.uk/info/200207/appeals>

# APPENDIX 9





For office use

Application for Planning Permission.  
Town and Country Planning Act 1990

**Publication of applications on planning authority websites.**

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

**1. Site Address**

Number

Suffix

Property name

Address line 1

Address line 2

Address line 3

Town/city

Postcode

Description of site location must be completed if postcode is not known:

Easting (x)

Northing (y)

Description

**2. Applicant Details**

Title

First name

Surname

Company name

Address line 1

Address line 2

Address line 3

Town/city

Country

## 2. Applicant Details

Postcode	<input type="text"/>
Primary number	<input type="text"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email address	<input type="text"/>

Are you an agent acting on behalf of the applicant?

Yes  No

## 3. Agent Details

Title	<input type="text" value="Mr"/>
First name	<input type="text" value="C"/>
Surname	<input type="text" value="Sharpe"/>
Company name	<input type="text" value="Architects Plus"/>
Address line 1	<input type="text" value="The Grange"/>
Address line 2	<input type="text" value="Market Square"/>
Address line 3	<input type="text"/>
Town/city	<input type="text" value="Westerham"/>
Country	<input type="text" value="United Kingdom"/>
Postcode	<input type="text" value="TN16 1HB"/>
Primary number	<input type="text" value="01959561078"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email	<input type="text" value="office@architects-plus.co.uk"/>

## 4. Site Area

What is the measurement of the site area?  
(numeric characters only).

Unit

## 5. Description of the Proposal

Please describe details of the proposed development or works including any change of use.

If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.

Has the work or change of use already started?

Yes  No

## 6. Existing Use

Please describe the current use of the site

residential

Is the site currently vacant?

Yes  No

**Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.**

Land which is known to be contaminated

Yes  No

Land where contamination is suspected for all or part of the site

Yes  No

A proposed use that would be particularly vulnerable to the presence of contamination

Yes  No

## 7. Materials

Does the proposed development require any materials to be used in the build?

Yes  No

**Please provide a description of existing and proposed materials and finishes to be used in the build (including type, colour and name for each material):**

Walls

Description of existing materials and finishes (optional):

yellow stock bricks

Description of proposed materials and finishes:

yellow stock bricks

Roof

Description of existing materials and finishes (optional):

Description of proposed materials and finishes:

slate effect tiles

Windows

Description of existing materials and finishes (optional):

Description of proposed materials and finishes:

white UPVC

Are you supplying additional information on submitted plans, drawings or a design and access statement?

Yes  No

If Yes, please state references for the plans, drawings and/or design and access statement

1501 05C and 06D

## 8. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicular access proposed to or from the public highway?

Yes  No

Is a new or altered pedestrian access proposed to or from the public highway?

Yes  No

Are there any new public roads to be provided within the site?

Yes  No

Are there any new public rights of way to be provided within or adjacent to the site?

Yes  No

Do the proposals require any diversions/extinguishments and/or creation of rights of way?

Yes  No

If you answered Yes to any of the above questions, please show details on your plans/drawings and state their reference numbers

drawing 1501 08E

## 9. Vehicle Parking

Is vehicle parking relevant to this proposal?

Yes  No

Please provide information on the existing and proposed number of on-site parking spaces

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	2	11	9

## 10. Trees and Hedges

Are there trees or hedges on the proposed development site?

Yes  No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

Yes  No

**If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of your local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.**

## 11. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Refer to the Environment Agency's Flood Map showing flood zones 2 and 3 and consult Environment Agency standing advice and your local planning authority requirements for information as necessary.)

Yes  No

**If Yes, you will need to submit a Flood Risk Assessment to consider the risk to the proposed site.**

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

Yes  No

Will the proposal increase the flood risk elsewhere?

Yes  No

**How will surface water be disposed of?**

Sustainable drainage system

Existing water course

Soakaway

Main sewer

Pond/lake

## 12. Biodiversity and Geological Conservation

**Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?**

**To assist in answering this question correctly, please refer to the help text which provides guidance on determining if any important biodiversity or geological conservation features may be present or nearby; and whether they are likely to be affected by the proposals.**

a) Protected and priority species:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

b) Designated sites, important habitats or other biodiversity features:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

c) Features of geological conservation importance:

## 12. Biodiversity and Geological Conservation

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

## 13. Foul Sewage

Please state how foul sewage is to be disposed of:

- Mains Sewer  
 Septic Tank  
 Package Treatment plant  
 Cess Pit  
 Other  
 Unknown

Are you proposing to connect to the existing drainage system?

Yes  No  Unknown

If Yes, please include the details of the existing system on the application drawings. Please state the plan(s)/drawing(s) references.

1501 08E

## 14. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste?

Yes  No

If Yes, please provide details:

1501 08E

Have arrangements been made for the separate storage and collection of recyclable waste?

Yes  No

If Yes, please provide details:

1501 08E

## 15. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or trade waste?

Yes  No

## 16. Residential/Dwelling Units

Due to changes in the information requirements for this question that are not currently available on the system, if you need to supply details of Residential/Dwelling Units for your application please follow these steps:

1. Answer 'No' to the question below;
2. Download and complete this supplementary information template (PDF);
3. Upload it as a supporting document on this application, using the 'Supplementary information template' document type.

This will provide the local authority with the required information to validate and determine your application.

Does your proposal include the gain, loss or change of use of residential units?

Yes  No

Please select the proposed housing categories that are relevant to your proposal.

- Market  
 Social  
 Intermediate  
 Key Worker

Add 'Market' residential units

## 16. Residential/Dwelling Units

### Market: Proposed Housing

	Number of bedrooms					
	1	2	3	4+	Unknown	Total
Flats/Maisonettes	0	9	0	0	0	9
Total	0	9	0	0	0	9

Please select the existing housing categories that are relevant to your proposal.

- Market  
 Social  
 Intermediate  
 Key Worker

Add 'Market' residential units

### Market: Existing Housing

	Number of bedrooms					
	1	2	3	4+	Unknown	Total
Houses	0	1	1	0	0	2
Total	0	1	1	0	0	2

Total proposed residential units

9

Total existing residential units

2

## 17. All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

Yes  No

## 18. Employment

Will the proposed development require the employment of any staff?

Yes  No

## 19. Hours of Opening

Are Hours of Opening relevant to this proposal?

Yes  No

## 20. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site:

none

Is the proposal for a waste management development?

Yes  No

**If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make it clear what information it requires on its website**

## 21. Hazardous Substances

Does the proposal involve the use or storage of any hazardous substances?

Yes  No

## 22. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes  No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact? (Please select only one)

- The agent  
 The applicant  
 Other person

## 23. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes  No

**If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):**

**Officer name:**

Title

First name

Surname

Reference

Date (Must be pre-application submission)

Details of the pre-application advice received

this is a application for renewal of permission 15 0297 which will lapse on 19 April 2019

## 24. Authority Employee/Member

**With respect to the Authority, is the applicant and/or agent one of the following:**

- (a) a member of staff  
(b) an elected member  
(c) related to a member of staff  
(d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

Yes  No

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

## 25. Ownership Certificates and Agricultural Land Declaration

**CERTIFICATE OF OWNERSHIP - CERTIFICATE A - Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14**

**I certify/The applicant certifies that on the day 21 days before the date of this application nobody except myself/the applicant was the owner\* of any part of the land or building to which the application relates, and that none of the land to which the application relates is, or is part of, an agricultural holding\*\***

**\* 'owner' is a person with a freehold interest or leasehold interest with at least 7 years left to run. \*\* 'agricultural holding' has the meaning given by reference to the definition of 'agricultural tenant' in section 65(8) of the Act.**

**NOTE: You should sign Certificate B, C or D, as appropriate, if you are the sole owner of the land or building to which the application relates but the land is, or is part of, an agricultural holding.**

Person role

- The applicant  
 The agent

## 25. Ownership Certificates and Agricultural Land Declaration

Title	Mr
First name	[REDACTED]
Surname	sharpe
Declaration date (DD/MM/YYYY)	17/12/2018

Declaration made

## 26. Declaration

I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Date (cannot be pre-application)	17/12/2018
----------------------------------	------------



To: **Mr J Cox**  
**C/o Architects Plus**  
**Contact: Mr C Sharpe**  
**The Grange**  
**Market Square**  
**Westerham**  
**Kent TN16 1HB**

**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)**  
**(ENGLAND) ORDER 2015**

**GRANT OF PERMISSION TO DEVELOP  
LAND SUBJECT TO CONDITIONS**

Reference Code :  
**19/00039/FUL**

**TAKE NOTICE** that Bexley Council, the Local Planning Authority under the Town and Country Planning Acts, **HAS GRANTED PERMISSION** for the development of land situated at :

176 - 178 Bexley Road  
Erith  
Kent  
DA8 3HF

For Demolition of existing dwellings and erection of a block of flats comprising 9 x 2 bed flats with associated car parking, cycle and bin storage areas, amenity space and access on Horsa Road.

Referred to in the application for permission for development received on 25th January 2019.

**SUBJECT TO THE CONDITIONS** as attached.

**Date of Decision: 19th March 2019**

*R. Lancaster*  
**Head of Development Management**

**CONDITIONS AND REASONS**

- 1 The development hereby permitted shall be begun within 3 years from the date of this permission.

**Reason:** To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004) .

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the approved plans, being Drawing No(s) 1501/01, 02D, 03C, 04E, 05C, 06D, 07C, 08E, 09 and 10C and any approval granted subsequently pursuant to this permission.

**Reason:** To prevent any unacceptable deviation from the approved plans.

- 3 Details of screen walls and fences shall be submitted to and approved in writing by the Local Planning Authority before development is commenced and such walls and fences shall be erected before the buildings with which they are associated are first occupied and shall thereafter be maintained.

**Reason:** In the interests of the visual amenities of the area.

- 4 Before development is commenced a schedule of materials and finishes and, where so required by the Local Planning Authority, samples of such materials and finishes to be used for the external walls and roofs of the proposed building(s) shall be submitted to and approved in writing by the Local Planning Authority.

**Reason:** To enable the Local Planning Authority to control the development in detail in the interests of amenity.

- 5 No development approved by this permission shall be commenced prior to a contaminated land assessment and associated remedial strategy together with a timetable of works, being submitted to the Local Planning Authority for approval.

a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval. The desk study shall detail the history of the site's uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved by the Local Planning Authority prior to investigations commencing on site (ref 1).

b) The site investigation including relevant soil gas surface and groundwater sampling, shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with Quality Assured sampling and analysis methodology (ref 2).

c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.

d) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance (ref 3). If during any works contamination is encountered which has not previously been identified then the additional contamination should be fully assessed and an appropriate remediation scheme submitted to the Local Planning Authority for approval.

e) Upon completion of the works this condition shall not be discharged until a closure report has been submitted to and approved in writing by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.

Ref 1: Contaminated Land Research Report nos. 2, 3 and 4 DoE

Ref 2: Contaminated Land Research Report no. 1 DoE

Ref 3: CIRIA Vols 1-12 Contaminated Land Series CIRIA "Building on Derelict Land"

**Reason:** To prevent harm to human health and pollution of the environment.

- 6 Prior to the construction of the building hereby approved, details of both a surface water drainage system (including storage facilities where necessary) and foul water drainage system shall be submitted to and approved in writing by or on behalf of the Local Planning Authority, and the approved system shall be completed before any part of the development hereby permitted is first occupied, and permanently maintained thereafter.

**Reason:** To ensure that the proposed development is satisfactorily drained. These details are required to be submitted before construction starts as the drainage measures will need to be installed early in the process.

- 7 Before development commences a demolition/construction methodology shall be submitted to and approved in writing by the Local Planning Authority, and the development shall not be carried out except in accordance with the approved details, which shall cover the following points:
- i) demolition/construction methods and techniques (including the avoidance of burning on site and vehicle movements); days/hours of work and deliveries of construction materials.
  - ii) means of minimising noise and vibration (including any piling), and compliance with BS 5228;
  - iii) means of minimising dust and similar emissions, in accordance with Air Quality: Best Practice Guidance - The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance (published by the Greater London Authority, July 2014).';
  - iv) means for the identification, removal and safe disposal of any asbestos;
  - v) construction site lighting;
  - vi) contact arrangements for the public, including 'out of hours' telephone numbers for named contacts.

**Reason:** To ensure that the proposed development does not prejudice the Amenities enjoyed by occupiers of properties in the vicinity. These details are required at the start of the project so as to ensure they are adhered to during demolition and construction works.

- 8 A landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented before the development

is occupied, or of any phase of the development as may be agreed with the Local Planning Authority and shall thereafter be maintained for five years. Trees and shrubs which die during this period shall be replaced.

**Reason:** In the interests of the amenities of the locality.

- 9 The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objective of Secured by Design. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority and shall be implemented in accordance with the approved details prior to occupation.

**Reason:** In order to achieve the principles and objectives of Secured By Design to improve community safety and crime prevention.

- 10 Prior to the commencement of development, an acoustic assessment from a suitably qualified acoustician to quantify the likely effect of road noise on the development shall be submitted to and approved in writing by the Local Planning Authority. The appraisal shall demonstrate how satisfactory internal noise levels (specifically within habitable rooms), in accordance with those specified in BS8233:2014, can be achieved.

**Reason:** To ensure suitable living conditions for future occupiers of the development in respect of noise. These details are required at the start of the project to ensure they are incorporated in the development design.

- 11 Prior to the commencement of development. The proposed specification of the glazing and ventilation to all facades of the building shall be submitted to and approved in writing by the Local Planning Authority. The works shall be implemented in accordance with the approved details.

**Reason:** To ensure suitable living conditions for future occupiers of the development in respect of noise. These details are required at the start of the project to ensure they are incorporated in the development design.

- 12 Upon completion of the works, certification shall be provided by a competent specialist and submitted to the Local Planning Authority confirming that the works comply with the approved details.

**Reason:** To ensure suitable living conditions for future occupiers of the development in respect of noise. These details are required at the start of the project to ensure they are incorporated in the development design.

- 13 Prior to the first occupation of the development hereby approved, further details of the refuse and recycling store shall be submitted to and approved in writing by the Local Planning Authority. These details shall include further details of the design, construction, appearance and location of the store, as well as details of means of how the store will be secured to prevent misuse. The refuse and recycling store shall be provided in accordance with the approved details prior to the first occupation of the development, and shall be permanently maintained as such thereafter.

**Reason:** To ensure a satisfactory standard of development.

- 14 The use of the land for vehicle parking shall not be commenced until the area has been laid out, surfaced and drained in accordance with details first submitted to, and approved

in writing by, the Local Planning Authority and shall be permanently maintained and available for such use thereafter.

**Reason:** To ensure a satisfactory standard of development and in the interests of highway safety.

- 15 The access to the parking area shall be provided with those parts of 2.4m x 2.4m pedestrian visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.

**Reason:** In the interests of highway safety.

- 16 Before the development hereby permitted is first used by vehicles, that part of a vehicular sight line of 2.4m x 25m metres which can be accommodated within the site shall be provided to the west of the access and shall thereafter be maintained free of all obstructions to visibility over a height of 600mm above the level of the adjoining carriageway.

**Reason:** To ensure that the proposed development does not prejudice the free flow of traffic or conditions of general safety along the adjoining highway.

- 17 Prior to the commencement of development, details of electric vehicle Charging points (EVCPs) to show 20% of parking spaces to have active EVCPs and 20% to be provided with passive infrastructure for future EVCPs shall be submitted to and approved in writing by the Local Planning Authority. The agreed details shall be implemented prior to occupation of any part of the development and shall be permanently maintained thereafter.

**Reason:** In the interests of sustainability. These details are required prior to commencement as they need to be factored into the design at an early stage.

- 18 Before any part of the development hereby permitted is first occupied, bicycle parking for at least 18 cycles (including covered storage facilities where appropriate) shall be provided at the site in accordance with details first submitted to and approved in writing by the Local Planning Authority, and the bicycle parking/storage facilities shall be permanently maintained thereafter.

**Reason:** In order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport.

- 19 The cycle store shown in the approved plans shall be provided as shown and shall be permanently maintained as such thereafter.

**Reason:** To ensure a satisfactory standard of development and to promote the use of sustainable modes of transport.

- 20 Before any part of the development is first occupied details of a scheme for the management of the car park and cycle parking including allocation of spaces and a system providing priority for vehicles entering the site shall be submitted to and approved in writing by or on behalf of the Local Planning Authority and the car park shall be operated in accordance with the approved scheme at all times unless previously agreed in writing by or on behalf of the Authority.

**Reason:** In order to avoid development without adequate parking and safe access, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

## **INFORMATIVES :-**

1 The applicant is advised to contact the Council's Public Realm Management Department regarding the required vehicle crossover to serve the new car park, the removal of existing redundant vehicle crossovers in Bexley Road and Horsa Road, the re-location of the existing lamp column in Horsa Road and the provision of revised part footway parking bays and any associated strengthening of the footway.

2 The applicant should be aware that this development is liable for both the Mayoral Community Infrastructure Levy and the London Borough of Bexley's Community Infrastructure Levy (CIL).

Before the implementation of this planning permission someone will need to assume Liability for any CIL Charge for the development.

Therefore the Council's CIL Administration Officer should be contacted at the earliest opportunity, to discuss what is required and to ensure that the correct process is followed. Contact in the first instance can be made by email to [DevelopmentControl@bexley.gov.uk](mailto:DevelopmentControl@bexley.gov.uk) or by telephone to 020 3045 5912.

Please note: - any failure to follow the correct process can lead to surcharges being applied to any CIL Charge due and subsequent legal proceedings can be taken including the issuing of a CIL Stop Notice.

3 The implementation of this planning permission will require the assignment of postal numbers. The Council, as the Local Street Naming and Numbering Authority, are responsible for approving new road names, assigning postal numbers and entering the information on the National Land & Property Gazetteer, a national database of address information.

An application must be submitted to the Council at the earliest opportunity, to ensure that any new numbers are assigned before the development is occupied. A fee will be required for this service (see Bexley Council's web site for details or telephone 0203 045 5732).

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

4 In view of the nature of the development proposed, the applicants are strongly advised to discuss the fire precautions to be implemented as part of the development including the use of a sprinkler system and hard wired smoke alarms with the Council's Building Control Manager (Tel 020 3045 4341).

5 The applicant is advised to contact the Council's Street Scene Services Department regarding the required vehicle crossover to serve the new car park, the removal of existing redundant vehicle crossovers in Bexley Road and Horsa Road, the re-location of the existing lamp column in Horsa Road and the provision of revised part footway parking bays and any associated strengthening of the footway.

6 If you are employing a trader/company to carry out work at your home or premises make sure they have a Waste Carrier's License if they are to dispose of the waste resulting from the work.

If you do not ask to see and make a note of their Waste Carrier's License you are not carrying out your Duty of Care and can be fined up to £5000.00 if the waste is then found fly-tipped. The license details, including expiry date, can be checked on the Environment Agency website for free <https://environment.data.gov.uk/public-register/view/search-waste-carriers-brokers> or you can phone directly on 08708 506 506.

- i) You must ensure your waste is secured safely and securely and prevent it from causing environmental pollution or harming anyone.
- ii) For each load of waste taken you need to be supplied with full waste transfer notes from the registered carrier.

### **PLEASE NOTE**

In dealing with this planning application, Bexley Council has worked with the applicant in a positive and proactive manner, in accordance with the requirements of paragraphs 186 & 187 of the National Planning Policy Framework, to seek solutions to problems where practicable. Detailed advice is available in the form of the Council's Development Plan as well as in the Mayor of London's and Bexley Council's Supplementary Planning Documents and Guidance. The Council also offers a full pre-application service that is available to all applicants to assist in formulating their proposals.

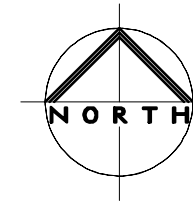
### **APPEALS**

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or if granted subject to conditions, then you can appeal to the Secretary of State. More details of the time limits for appeals and how you go about appealing along with Purchase Notices can be found on the following websites:

<https://www.gov.uk/government/organisations/planning-inspectorate>

<https://www.planningportal.co.uk/info/200207/appeals>

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- 0 Contractors must check all dimensions from site and Architects to be notified of any discrepancies in figured dimensions
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- 0 The purpose of this drawing is existing survey

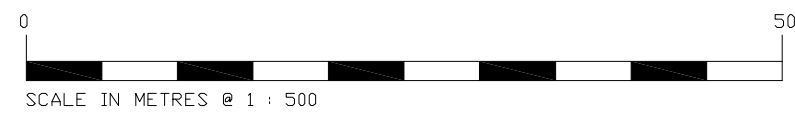


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LOCATION PLAN



BLOCK PLAN



**MARTYN PATTIE**  
Architects and Designers

Bailey House,  
178 High Street, Ongar, Essex. CM5 9JJ  
Tel: 01277-364979 Fax: 01277-364978  
e-mail: architect@martynpattie.co.uk  
website: www.martynpattie.co.uk

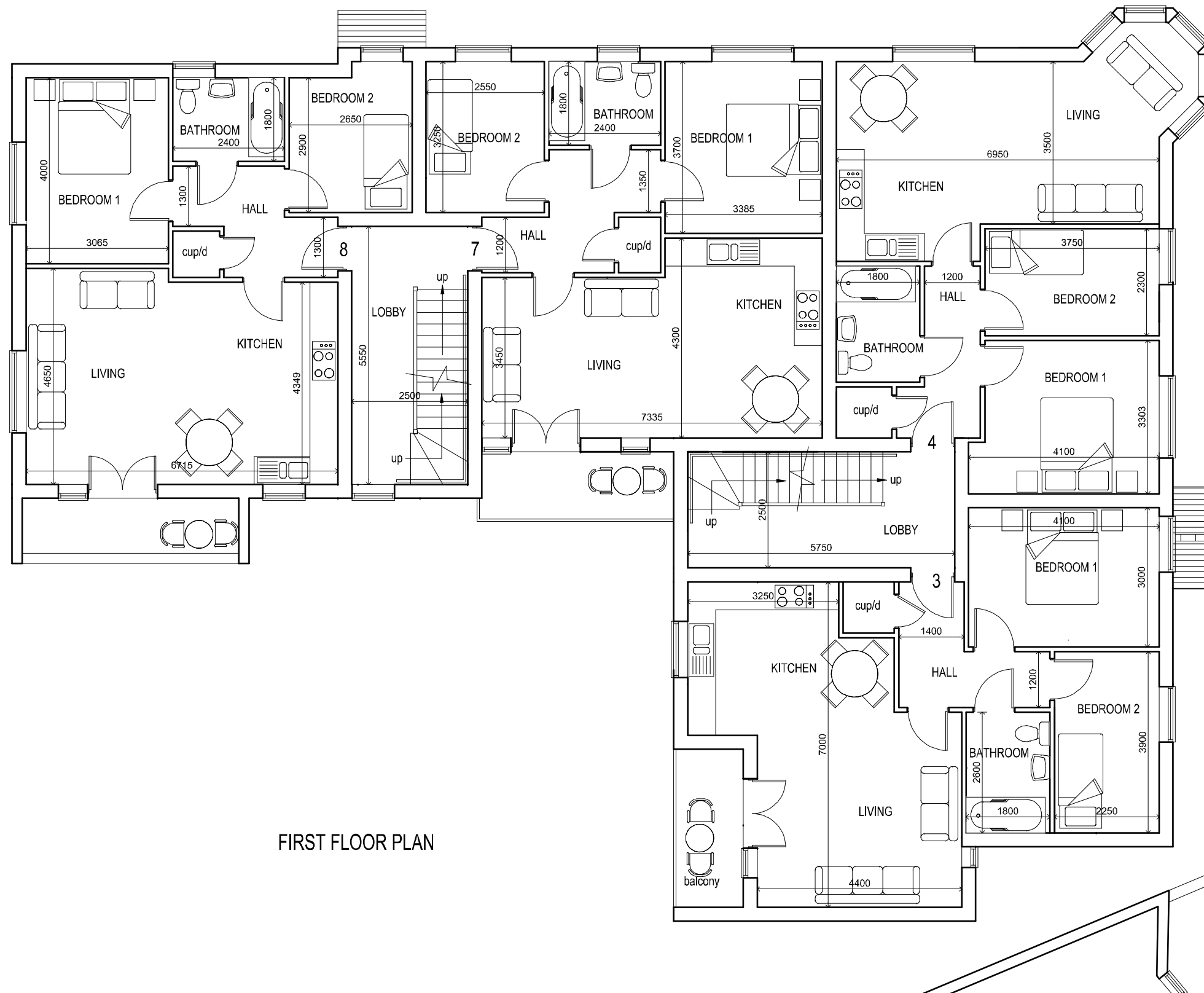
**176 - 178 BEXLEY RD, ERITH,  
KENT, DA8 3HF -  
AS EXISTING BLOCK & LOCATION PLAN**

Scales 1:500 & 1:1250  
Date 24/06/14

**1501/01**



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FIRST FLOOR PLAN

FLAT no.	FLOOR	AREA m2	BEDROOMS
1	G	64.2	1 double 1 single
2	G	64.8	1 double 1 single
3	F	65.3	1 double 1 single
4	F	63.7	1 double 1 single
5	S	93.2	2 doubles
6	G	64.2	1 double 1 single
7	F	63.3	1 double 1 single
8	F	63.8	1 double 1 single
9	S	80	1 double 1 single

REV C) AMENDED PLANNERS COMMENTS - 10/12/2015  
 REV B) AMENDED PLANNERS COMMENTS - 02/12/2015  
 REV A) AMENDED TO CLIENTS & PLANNERS COMMENTS - 23/04/2015

**MARTYN PATTIE**  
 Architects and Designers

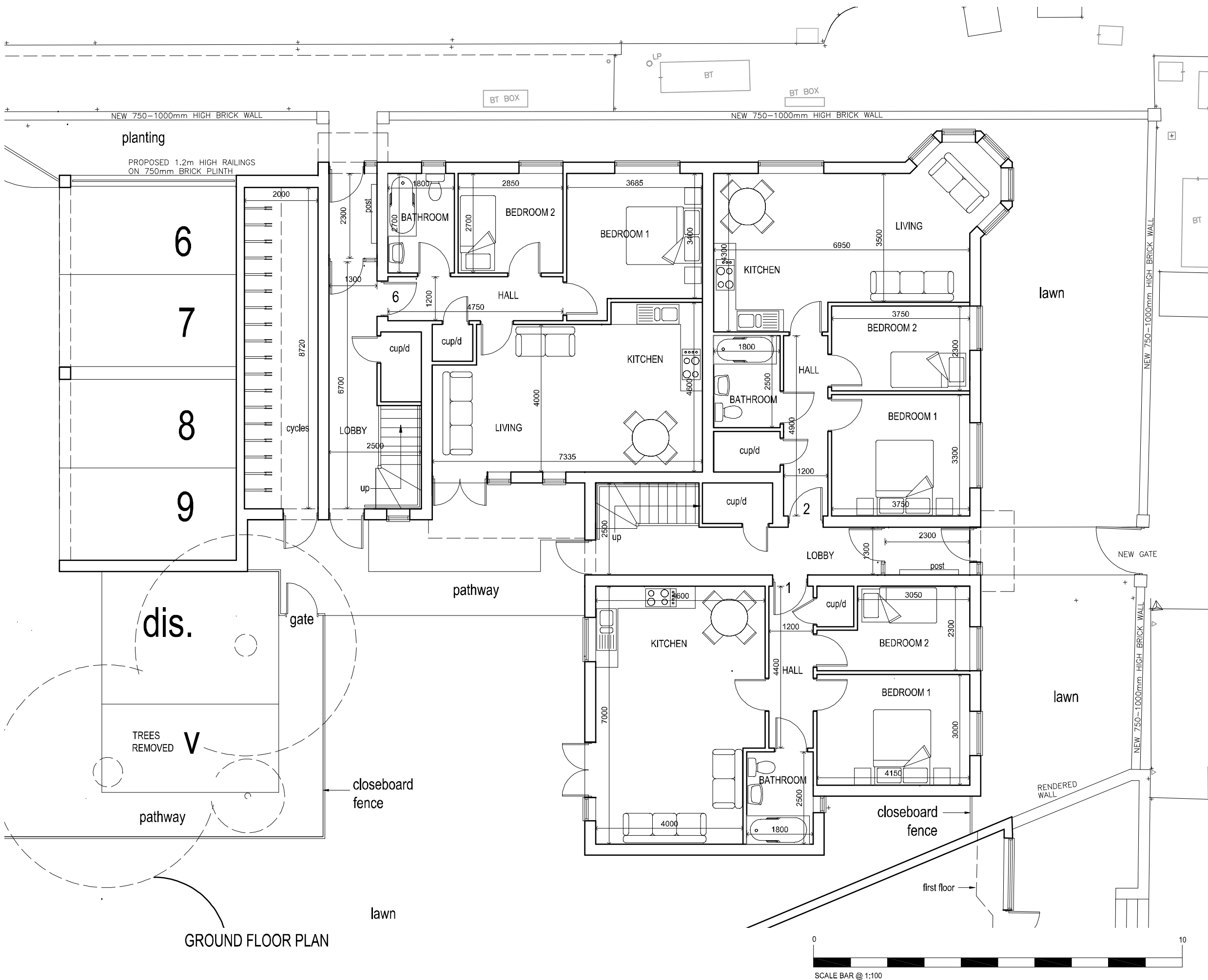
Bailey House,  
 178 High Street, Ongar, Essex. CM5 9JJ  
 Tel: 01277-364979 Fax: 01277-364978  
 e-mail: architect@martynpattie.co.uk  
 website: www.martynpattie.co.uk

**176 - 178 BEXLEY RD, ERITH,  
 KENT, DA8 3HF -  
 AS PROPOSED FIRST FLOOR PLAN**

Scales 1: 100 @ A3  
 Date 24/06/14

1501/03C

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 0 This Drawing is copyright  
 0 The purpose of this drawing is planning



FLAT no.	FLOOR	AREA m2	BEDROOMS
1	G	64.2	1 double 1 single
2	G	64.8	1 double 1 single
3	F	65.3	1 double 1 single
4	F	63.7	1 double 1 single
5	S	93.2	2 doubles
6	G	64.2	1 double 1 single
7	F	63.3	1 double 1 single
8	F	63.8	1 double 1 single
9	S	80	1 double 1 single

dis.

TREES REMOVED

GROUND FLOOR PLAN

REV D) AMENDED TO SHOW FENCE - 14/12/2015  
 REV C) AMENDED TO PLANNERS COMMENTS - 10/12/2015  
 REV B) AMENDED TO PLANNERS COMMENTS - 02/12/2015  
 REV A) AMENDED TO CLIENTS & PLANNERS COMMENTS - 23/04/2015

**MARTYN PATTIE**  
 Architects and Designers

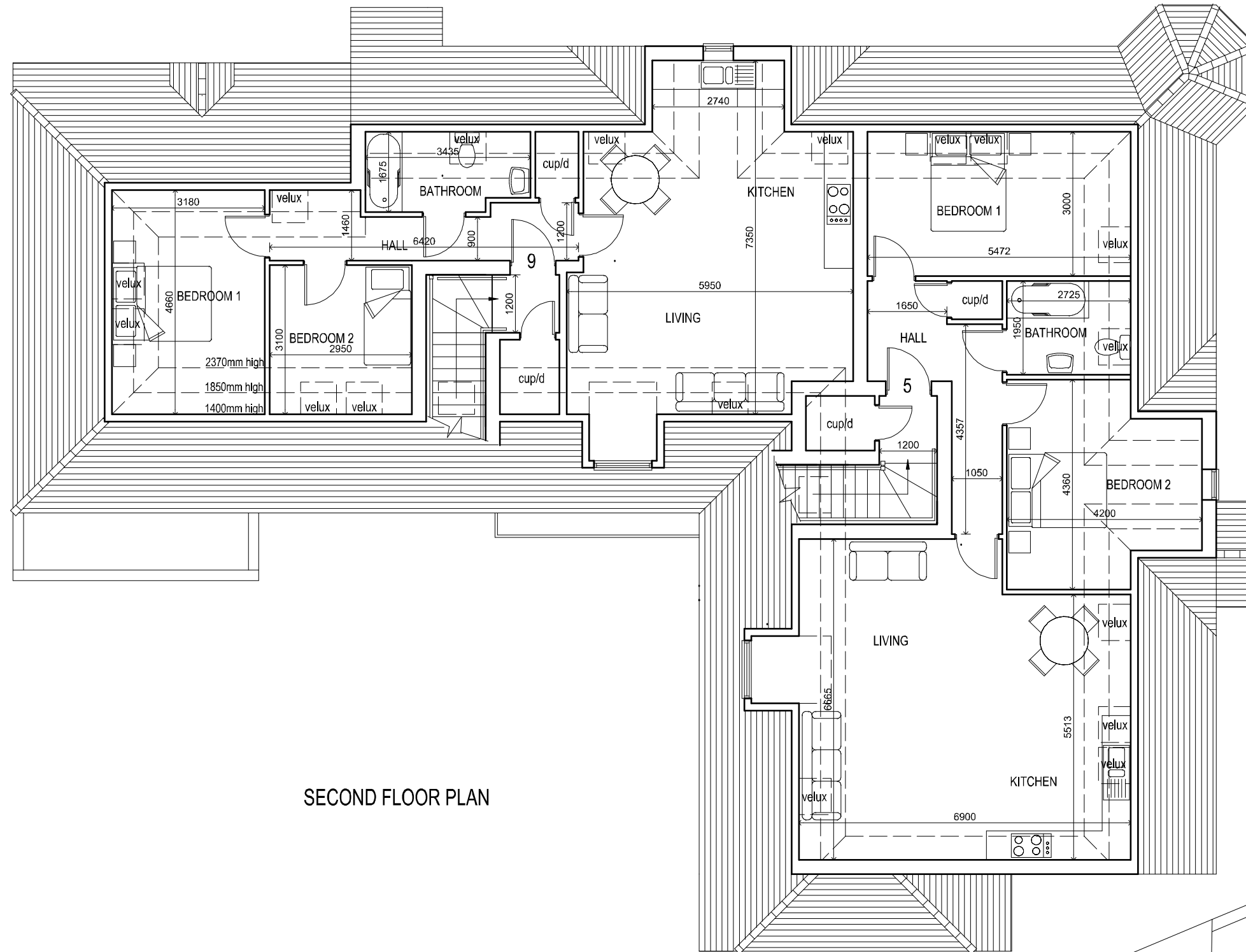
Bailey House,  
 178 High Street, Ongar, Essex. CM5 9JJ  
 Tel: 01277-364979 Fax: 01277-364978  
 e-mail: architect@martynpattie.co.uk  
 website: www.martynpattie.co.uk

176 - 178 BEXLEY RD, ERITH,  
 KENT, DA8 3HF -  
 AS PROPOSED GROUND FLOOR PLAN

Scales 1:100 @ A3  
 Date 24/06/14

**1501/02D**

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- 0 This Drawing is copyright
- 0 The purpose of this drawing is planning



SECOND FLOOR PLAN

FLAT no.	FLOOR	AREA m2	BEDROOMS
1	G	64.2	1 double 1 single
2	G	64.8	1 double 1 single
3	F	65.3	1 double 1 single
4	F	63.7	1 double 1 single
5	S	93.2	2 doubles
6	G	64.2	1 double 1 single
7	F	63.3	1 double 1 single
8	F	63.8	1 double 1 single
9	S	80	1 double 1 single

- REV E) AMENDED TO SHOW ROOF TILES - 11/12/2015
- REV D) AMENDED TO PLANNERS COMMENTS - 10/12/2015
- REV C) AMENDED TO PLANNERS COMMENTS - 02/12/2015
- REV B) AMENDED TO CLIENTS & PLANNERS COMMENTS - 23/04/2015

**MARTYN PATTIE**  
Architects and Designers

Bailey House,  
178 High Street, Ongar, Essex. CM5 9JJ  
Tel: 01277-364979 Fax: 01277-364978  
e-mail: architect@martynpattie.co.uk  
website: www.martynpattie.co.uk

176 - 178 BEXLEY RD, ERITH,  
KENT, DA8 3HF -  
AS PROPOSED SECOND FLOOR PLAN

Scales 1: 100 @ A3  
Date 26/03/15

1501/04E

# APPENDIX 10



For office use

Application for Planning Permission.  
Town and Country Planning Act 1990

**Publication of applications on planning authority websites.**

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

**1. Site Address**

Number	33
Suffix	
Property name	
Address line 1	Monterey Close
Address line 2	
Address line 3	
Town/city	Bexley
Postcode	DA5 2BX

Description of site location must be completed if postcode is not known:

Easting (x)	550314
Northing (y)	172547
Description	

**2. Applicant Details**

Title	Other
Other	DR
First name	E
Surname	SCOTT
Company name	
Address line 1	C/O AGENT
Address line 2	
Address line 3	
Town/city	

## 2. Applicant Details

Country	<input type="text"/>
Postcode	<input type="text"/>
Primary number	<input type="text"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email address	<input type="text"/>

Are you an agent acting on behalf of the applicant?

Yes  No

## 3. Agent Details

Title	<input type="text" value="Mr"/>
First name	<input type="text" value="Graham"/>
Surname	<input type="text" value="Simpkin"/>
Company name	<input type="text" value="Graham Simpkin Planning"/>
Address line 1	<input type="text" value="2 The Parade"/>
Address line 2	<input type="text" value="Ash Road"/>
Address line 3	<input type="text" value="Hartley"/>
Town/city	<input type="text" value="Longfield"/>
Country	<input type="text" value="United Kingdom"/>
Postcode	<input type="text" value="DA3 8BG"/>
Primary number	<input type="text" value="01474703705"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email	<input type="text" value="webmail@grahamsimpkinplanning.co.uk"/>

## 4. Site Area

What is the measurement of the site area?  
(numeric characters only).

Unit

## 5. Description of the Proposal

Please describe details of the proposed development or works including any change of use.

If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.

DEMOLITION OF EXISTING DWELLING, DEMOLITION OF OUTBUILDINGS, STABLE YARD, REMOVAL OF VEHICLE PARKING AND SAND SCHOOL AND ERECTION OF 6 DETACHED SINGLE STOREY DWELLINGS, ACCESS ROAD AND CHANGE OF USE OF THE REMAINDER OF THE LAND TO OPEN SPACE

Has the work or change of use already started?

Yes  No

## 6. Existing Use

Please describe the current use of the site

DWELLING HOUSE WITH ANCILLARY BUILDINGS  
STABLE YARD, SAND SCHOOL, AREAS OF HARDSTANDING

Is the site currently vacant?  Yes  No

**Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.**

Land which is known to be contaminated  Yes  No

Land where contamination is suspected for all or part of the site  Yes  No

A proposed use that would be particularly vulnerable to the presence of contamination  Yes  No

## 7. Materials

Does the proposed development require any materials to be used in the build?  Yes  No

**Please provide a description of existing and proposed materials and finishes to be used in the build (including type, colour and name for each material):**

Walls	
Description of existing materials and finishes (optional):	
Description of proposed materials and finishes:	YELLOW STOCK BRICK WHITE PAINTED SMOOTH RENDER GREY COLOURED PANELS

Roof	
Description of existing materials and finishes (optional):	
Description of proposed materials and finishes:	STANDING SEAM METAL ROOF

Windows	
Description of existing materials and finishes (optional):	
Description of proposed materials and finishes:	GREY COLOURED ALUMINIUM WINDOWS AND DOORS SILVER ALUMINIUM FASCIAS

Doors	
Description of existing materials and finishes (optional):	
Description of proposed materials and finishes:	COLOURED ALUMINIUM

Are you supplying additional information on submitted plans, drawings or a design and access statement?  Yes  No

If Yes, please state references for the plans, drawings and/or design and access statement

DESIGN ACCESS AND PLANNING STATEMENT 2789  
DRAWING NOS. 2789

## 8. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicular access proposed to or from the public highway?  Yes  No

## 8. Pedestrian and Vehicle Access, Roads and Rights of Way

- Is a new or altered pedestrian access proposed to or from the public highway?  Yes  No
- Are there any new public roads to be provided within the site?  Yes  No
- Are there any new public rights of way to be provided within or adjacent to the site?  Yes  No
- Do the proposals require any diversions/extinguishments and/or creation of rights of way?  Yes  No

## 9. Vehicle Parking

Is vehicle parking relevant to this proposal?  Yes  No

Please provide information on the existing and proposed number of on-site parking spaces

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	0	12	12

## 10. Trees and Hedges

Are there trees or hedges on the proposed development site?  Yes  No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?  Yes  No

**If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of your local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.**

## 11. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Refer to the Environment Agency's Flood Map showing flood zones 2 and 3 and consult Environment Agency standing advice and your local planning authority requirements for information as necessary.)  Yes  No

**If Yes, you will need to submit a Flood Risk Assessment to consider the risk to the proposed site.**

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?  Yes  No

Will the proposal increase the flood risk elsewhere?  Yes  No

**How will surface water be disposed of?**

Sustainable drainage system

Existing water course

Soakaway

Main sewer

Pond/lake

## 12. Biodiversity and Geological Conservation

**Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?**

**To assist in answering this question correctly, please refer to the help text which provides guidance on determining if any important biodiversity or geological conservation features may be present or nearby; and whether they are likely to be affected by the proposals.**



## 12. Biodiversity and Geological Conservation

a) Protected and priority species:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

b) Designated sites, important habitats or other biodiversity features:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

c) Features of geological conservation importance:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

## 13. Foul Sewage

Please state how foul sewage is to be disposed of:

- Mains Sewer  
 Septic Tank  
 Package Treatment plant  
 Cess Pit  
 Other  
 Unknown

Are you proposing to connect to the existing drainage system?

- Yes  No  Unknown

## 14. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste?

- Yes  No

If Yes, please provide details:

DRAWING NO. 09

Have arrangements been made for the separate storage and collection of recyclable waste?

- Yes  No

## 15. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or trade waste?

- Yes  No

## 16. Residential/Dwelling Units

**Due to changes in the information requirements for this question that are not currently available on the system, if you need to supply details of Residential/Dwelling Units for your application please follow these steps:**

1. Answer 'No' to the question below;
2. Download and complete this supplementary information template (PDF);
3. Upload it as a supporting document on this application, using the 'Supplementary information template' document type.

**This will provide the local authority with the required information to validate and determine your application.**

Does your proposal include the gain, loss or change of use of residential units?

- Yes  No

Please select the proposed housing categories that are relevant to your proposal.

- Market  
 Social  
 Intermediate  
 Key Worker

Add 'Market' residential units

## 16. Residential/Dwelling Units

### Market: Proposed Housing

	Number of bedrooms					Total
	1	2	3	4+	Unknown	
Houses	0	6	0	0	0	6
Total	0	6	0	0	0	6

Please select the existing housing categories that are relevant to your proposal.

- Market  
 Social  
 Intermediate  
 Key Worker

Add 'Market' residential units

### Market: Existing Housing

	Number of bedrooms					Total
	1	2	3	4+	Unknown	
Houses	0	0	1	0	0	1
Total	0	0	1	0	0	1

Total proposed residential units

6

Total existing residential units

1

## 17. All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

Yes  No

If you have answered Yes to the question above please add details in the following table:

Use Class	Existing gross internal floorspace (square metres)	Gross internal floorspace to be lost by change of use or demolition (square metres)	Total gross new internal floorspace proposed (including changes of use) (square metres)	Net additional gross internal floorspace following development (square metres)
Other	355.2	355.2	0	-355.2
Total	355.2	355.2	0	-355.2

For hotels, residential institutions and hostels please additionally indicate the loss or gain of rooms:

## 18. Employment

Will the proposed development require the employment of any staff?

Yes  No

## 19. Hours of Opening

Are Hours of Opening relevant to this proposal?

Yes  No

## 20. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site:

N/A

Is the proposal for a waste management development?

Yes  No

**If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make it clear what information it requires on its website**

## 21. Hazardous Substances

Does the proposal involve the use or storage of any hazardous substances?

Yes  No

## 22. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes  No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact? (Please select only one)

- The agent  
 The applicant  
 Other person

## 23. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes  No

**If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):**

**Officer name:**

Title	Mr
First name	G
Surname	CLEGG
Reference	17/03087/PREAPP

Date (Must be pre-application submission)

07/02/2018

Details of the pre-application advice received

DEVELOPMENT IN GREEN BELT WITHIN PARA 89 OF NPPF (NOW 146)  
OR VERY SPECIAL CIRCUMSTANCES  
BUNGALOWS WILL MINIMISE IMPACT ON CHARACTER AND APPEARANCE OF AREA  
DEVELOPMENT TO BE WELL SEPARATED FROM NEARBY PROPERTIES TO AVOID OVER-LOOKING

## 24. Authority Employee/Member

**With respect to the Authority, is the applicant and/or agent one of the following:**

- (a) a member of staff  
(b) an elected member  
(c) related to a member of staff  
(d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

Yes  No

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

## 25. Ownership Certificates and Agricultural Land Declaration

CERTIFICATE OF OWNERSHIP - CERTIFICATE A - Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14

I certify/The applicant certifies that on the day 21 days before the date of this application nobody except myself/the applicant was the owner\* of any part of the land or building to which the application relates, and that none of the land to which the application relates is, or is part of, an agricultural holding\*\*

\* 'owner' is a person with a freehold interest or leasehold interest with at least 7 years left to run. \*\* 'agricultural holding' has the meaning given by reference to the definition of 'agricultural tenant' in section 65(8) of the Act.

**NOTE:** You should sign Certificate B, C or D, as appropriate, if you are the sole owner of the land or building to which the application relates but the land is, or is part of, an agricultural holding.

Person role

- The applicant  
 The agent

Title

First name

Surname

Declaration date (DD/MM/YYYY)

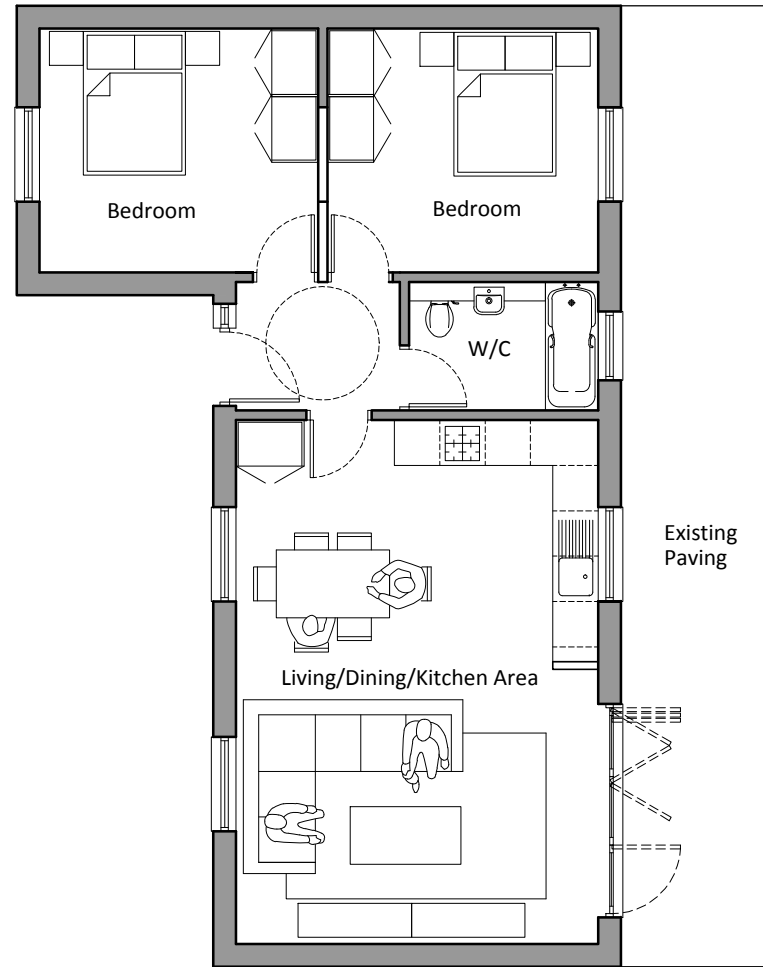
Declaration made

## 26. Declaration

I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Date (cannot be pre-application)

Note  
 This drawing is protected by copyright and must not be copied or reproduced without the written consent of Graham Simpkin Planning. All dimensions and sizes to be checked on site. North points are indicative. ©



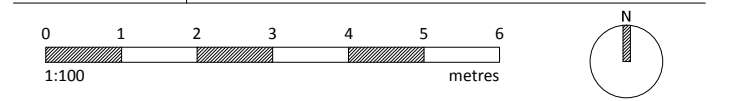
Proposed Floor Plan  
 1:100



2 The Parade, Ash Road, Hartley  
 Longfield, Kent DA3 8BG  
 Tel: 01474 703705  
 www.grahamsimpkinplanning.co.uk  
 Email: webmail@grahamsimpkinplanning.co.uk

Project Title 33 Monterey Close, Bexley DA5 2BX		Job No 2789
Drawing Title Proposed Ground Plan	Drawing No SK01	Revision -
Date 13.09.2018	Drawn by MS	Checked by DA

Scale 1:100 @ A3	Note
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Note

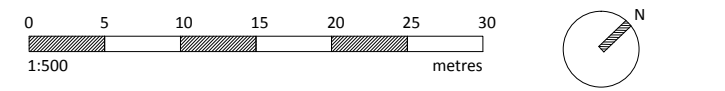
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2 The Parade, Ash Road, Hartley  
Longfield, Kent DA3 8BG  
Tel: 01474 703705  
www.grahamsimpkinplanning.co.uk  
Email: webmail@grahamsimpkinplanning.co.uk

Project Title 33 Monterey Close, Bexley DA5 2BX		Job No 2789
Drawing Title Proposed Site Layout Plan	Drawing No 09	Revision C 30.05.2019
Date 18.10.2018	Drawn by JV	Checked by DA

Scale 1:500 @ A3	Note
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# APPENDIX 11



For office use

Application for Planning Permission.  
Town and Country Planning Act 1990

**Publication of applications on planning authority websites.**

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

**1. Site Address**

Number	4
Suffix	
Property name	
Address line 1	Broomfield Road
Address line 2	
Address line 3	
Town/city	Bexleyheath
Postcode	DA6 7PA

Description of site location must be completed if postcode is not known:

Easting (x)	549659
Northing (y)	174663
Description	

**2. Applicant Details**

Title	Mr
First name	
Surname	.
Company name	Bencewell Properties Limited
Address line 1	.
Address line 2	
Address line 3	
Town/city	
Country	



## 2. Applicant Details

Postcode	<input type="text"/>
Primary number	<input type="text"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email address	<input type="text"/>

Are you an agent acting on behalf of the applicant?

Yes  No

## 3. Agent Details

Title	<input type="text" value="Mr"/>
First name	<input type="text" value="E"/>
Surname	<input type="text" value="Pattison"/>
Company name	<input type="text" value="Boyer"/>
Address line 1	<input type="text" value="2nd Floor, 24 Southwark Bridge Road"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Town/city	<input type="text" value="London"/>
Country	<input type="text"/>
Postcode	<input type="text" value="SE1 9HF"/>
Primary number	<input type="text" value="02032682439"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email	<input type="text" value="billypattison@boyerplanning.co.uk"/>

## 4. Site Area

What is the measurement of the site area?  
(numeric characters only).

Unit

## 5. Description of the Proposal

Please describe details of the proposed development or works including any change of use.

If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.

Demolition of the existing dwelling and construction of a two storey building, with accommodation within the roofspace, to provide nine residential units. Associated alterations including the erection of refuse any cycle stores, landscaping, car parking and alterations to the highways access.

Has the work or change of use already started?

Yes  No

## 6. Existing Use

Please describe the current use of the site

Single family dwelling (Class C3)

Is the site currently vacant?

Yes  No

**Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.**

Land which is known to be contaminated

Yes  No

Land where contamination is suspected for all or part of the site

Yes  No

A proposed use that would be particularly vulnerable to the presence of contamination

Yes  No

## 7. Materials

Does the proposed development require any materials to be used in the build?

Yes  No

**Please provide a description of existing and proposed materials and finishes to be used in the build (including type, colour and name for each material):**

Walls

Description of existing materials and finishes (optional):

Please see submitted drawings and DAS.

Description of proposed materials and finishes:

Please see submitted drawings and DAS.

Are you supplying additional information on submitted plans, drawings or a design and access statement?

Yes  No

If Yes, please state references for the plans, drawings and/or design and access statement

Please see submitted drawings and DAS.

## 8. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicular access proposed to or from the public highway?

Yes  No

Is a new or altered pedestrian access proposed to or from the public highway?

Yes  No

Are there any new public roads to be provided within the site?

Yes  No

Are there any new public rights of way to be provided within or adjacent to the site?

Yes  No

Do the proposals require any diversions/extinguishments and/or creation of rights of way?

Yes  No

If you answered Yes to any of the above questions, please show details on your plans/drawings and state their reference numbers

Full details within Transport Assessment and proposed drawings.

## 9. Vehicle Parking

Is vehicle parking relevant to this proposal?

Yes  No

Please provide information on the existing and proposed number of on-site parking spaces

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	2	8	6
Cycle spaces	0	17	17

## 10. Trees and Hedges

Are there trees or hedges on the proposed development site?

Yes  No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

Yes  No

**If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of your local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.**

## 11. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Refer to the Environment Agency's Flood Map showing flood zones 2 and 3 and consult Environment Agency standing advice and your local planning authority requirements for information as necessary.)

Yes  No

**If Yes, you will need to submit a Flood Risk Assessment to consider the risk to the proposed site.**

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

Yes  No

Will the proposal increase the flood risk elsewhere?

Yes  No

**How will surface water be disposed of?**

Sustainable drainage system

Existing water course

Soakaway

Main sewer

Pond/lake

## 12. Biodiversity and Geological Conservation

**To assist in answering the following questions refer to the guidance notes for further information on when there is a reasonable likelihood that any important biodiversity or geological conservation features may be present or nearby and whether they are likely to be affected by your proposals. Having referred to the guidance notes, is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?**

a) Protected and priority species (see guidance note):

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

b) Designated sites, important habitats or other biodiversity features (see guidance note):

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

c) Features of geological conservation importance (see guidance note):

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

## 13. Foul Sewage

Please state how foul sewage is to be disposed of:

### 13. Foul Sewage

- Mains Sewer
- Septic Tank
- Package Treatment plant
- Cess Pit
- Other
- Unknown

Are you proposing to connect to the existing drainage system?

Yes  No  Unknown

### 14. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste?

Yes  No

If Yes, please provide details:

Please see proposed drawings

Have arrangements been made for the separate storage and collection of recyclable waste?

Yes  No

If Yes, please provide details:

Please see proposed drawings

### 15. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or trade waste?

Yes  No

### 16. Residential/Dwelling Units

Due to changes in the information requirements for this question that are not currently available on the system, if you need to supply details of Residential/Dwelling Units for your application please follow these steps:

1. Answer 'No' to the question below;
2. Download and complete this supplementary information template (PDF);
3. Upload it as a supporting document on this application, using the 'Supplementary information template' document type.

This will provide the local authority with the required information to validate and determine your application.

Does your proposal include the gain, loss or change of use of residential units?

Yes  No

Please select the proposed housing categories that are relevant to your proposal.

- Market
- Social
- Intermediate
- Key Worker

Add 'Market' residential units

Market: Proposed Housing						
	Number of bedrooms					Total
	1	2	3	4+	Unknown	
Flats/Maisonettes	2	7	0	0	0	9
Total	2	7	0	0	0	9

Please select the existing housing categories that are relevant to your proposal.

- Market
- Social
- Intermediate
- Key Worker

## 16. Residential/Dwelling Units

Add 'Market' residential units

Market: Existing Housing						
	Number of bedrooms					Total
	1	2	3	4+	Unknown	
Houses	0	0	1	0	0	1
Total	0	0	1	0	0	1

Total proposed residential units

9

Total existing residential units

1

## 17. All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

Yes  No

## 18. Employment

Will the proposed development require the employment of any staff?

Yes  No

## 19. Hours of Opening

Are Hours of Opening relevant to this proposal?

Yes  No

## 20. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site:

Is the proposal for a waste management development?

Yes  No

**If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make it clear what information it requires on its website**

## 21. Hazardous Substances

Is any hazardous waste involved in the proposal?

Yes  No

## 22. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes  No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact? (Please select only one)

- The agent  
 The applicant  
 Other person

## 23. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes  No

### 23. Pre-application Advice

If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):

Officer name:

Title	Mr
First name	Richard
Surname	Turek
Reference	

Date (Must be pre-application submission)

30/08/2018

Details of the pre-application advice received

Pre-application response provided support for the principle of flatted redevelopment scheme.

### 24. Authority Employee/Member

With respect to the Authority, is the applicant and/or agent one of the following:

- (a) a member of staff
- (b) an elected member
- (c) related to a member of staff
- (d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

Yes  No

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

### 25. Ownership Certificates and Agricultural Land Declaration

**CERTIFICATE OF OWNERSHIP - CERTIFICATE B - Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14**

I certify/The applicant certifies that I have/the applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner\* and/or agricultural tenant\*\* of any part of the land or building to which this application relates.

\* 'owner' is a person with a freehold interest or leasehold interest with at least 7 years left to run. \*\* 'agricultural tenant' has the meaning given in section 65(8) of the Town and Country Planning Act 1990

Owner/Agricultural Tenant

Name of Owner/Agricultural Tenant	
Number	4
Suffix	
House Name	
Address line 1	Broomfield Road
Address line 2	
Town/city	Bexley
Postcode	DA6 7PA
Date notice served (DD/MM/YYYY)	17/10/2018

Person role

## 25. Ownership Certificates and Agricultural Land Declaration

- The applicant  
 The agent

Title

First name

Surname

Declaration date (DD/MM/YYYY)

Declaration made

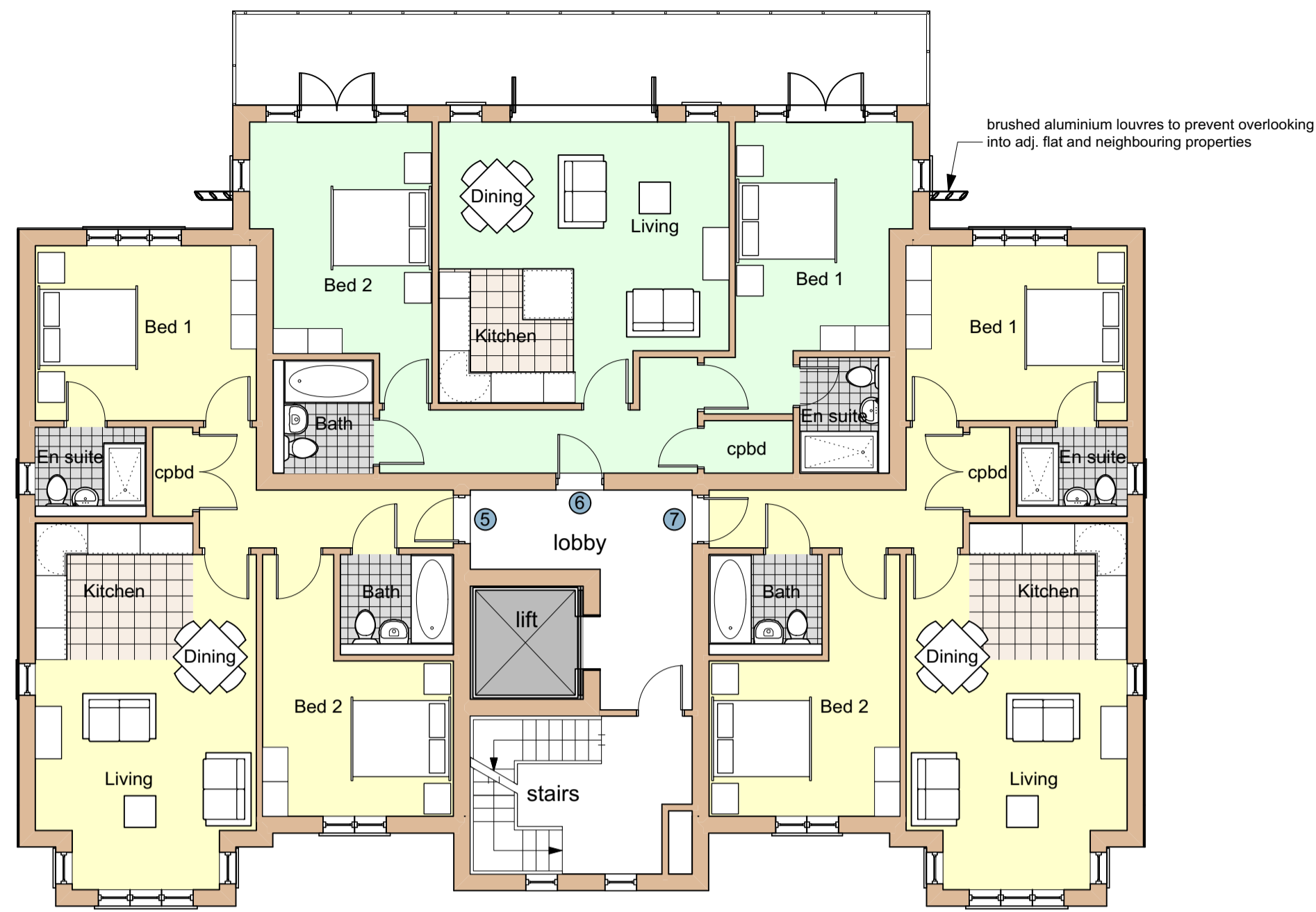
***SUPERSEDED OWNERSHIP CERTIFICATE***

## 26. Declaration

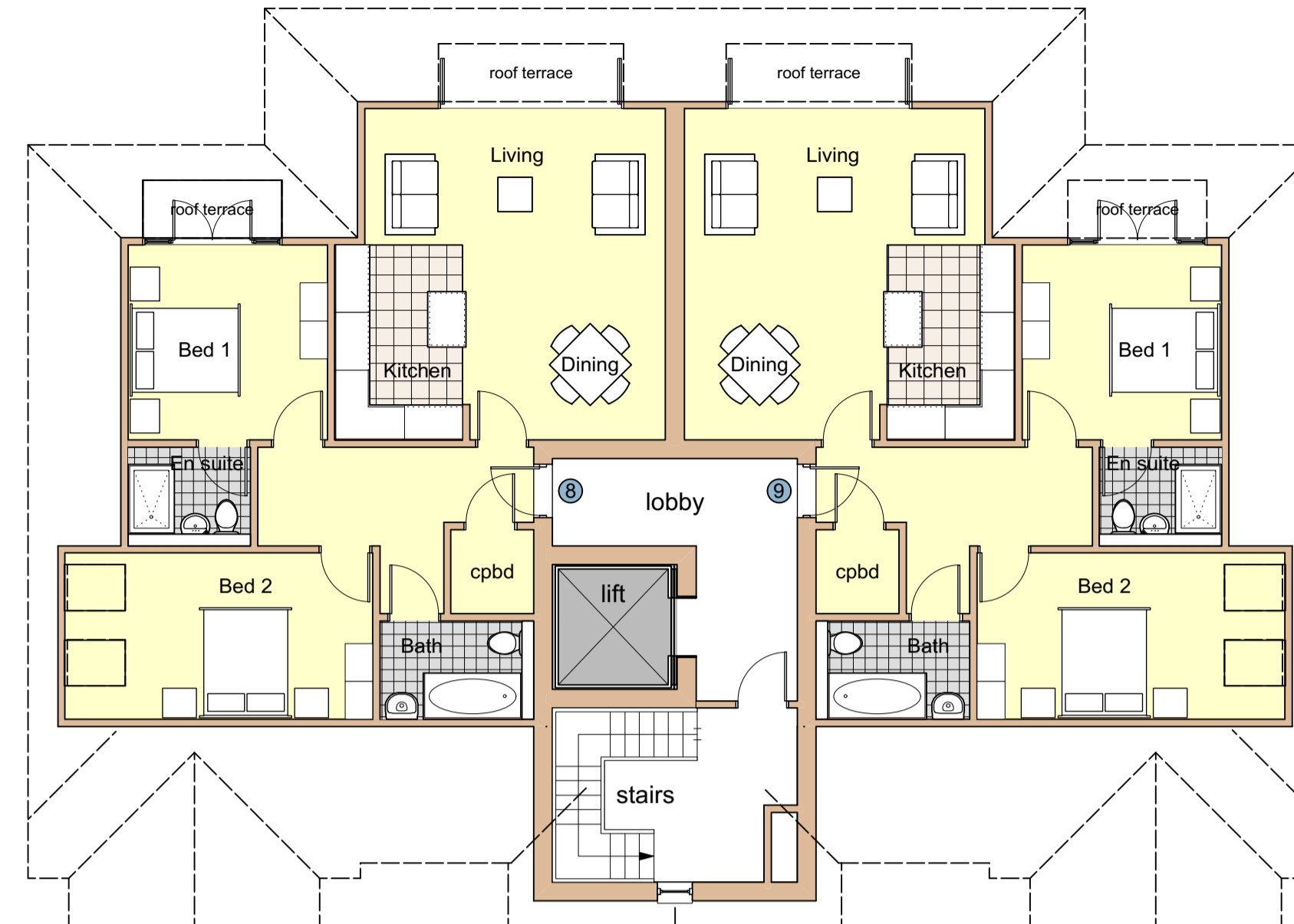
I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Date (cannot be pre-application)

Smart Architecture Ltd.  
 Copyrights reserved.  
 Use figured dimensions only.  
 Do not scale from this drawing.  
 All levels and dimensions to be checked on site by contractor. Any discrepancy to be verified by the Architect before proceeding.  
 Drawing to be read in conjunction with all relevant SA drawings and specification clauses.  
 The Contractor and relevant fabricated products to be built to current British and European Standards.  
 This drawing must not be used for Land Transfer unless stated as 'Conveyance'.  
 This drawing and its subject matter are the confidential property of Smart Architecture Ltd and shall not be copied, reproduced, used or disclosed to others without the prior written authority of Smart Architecture Ltd.



First Floor Plan



Roofspace Floor Plan

Accommodation Schedule:

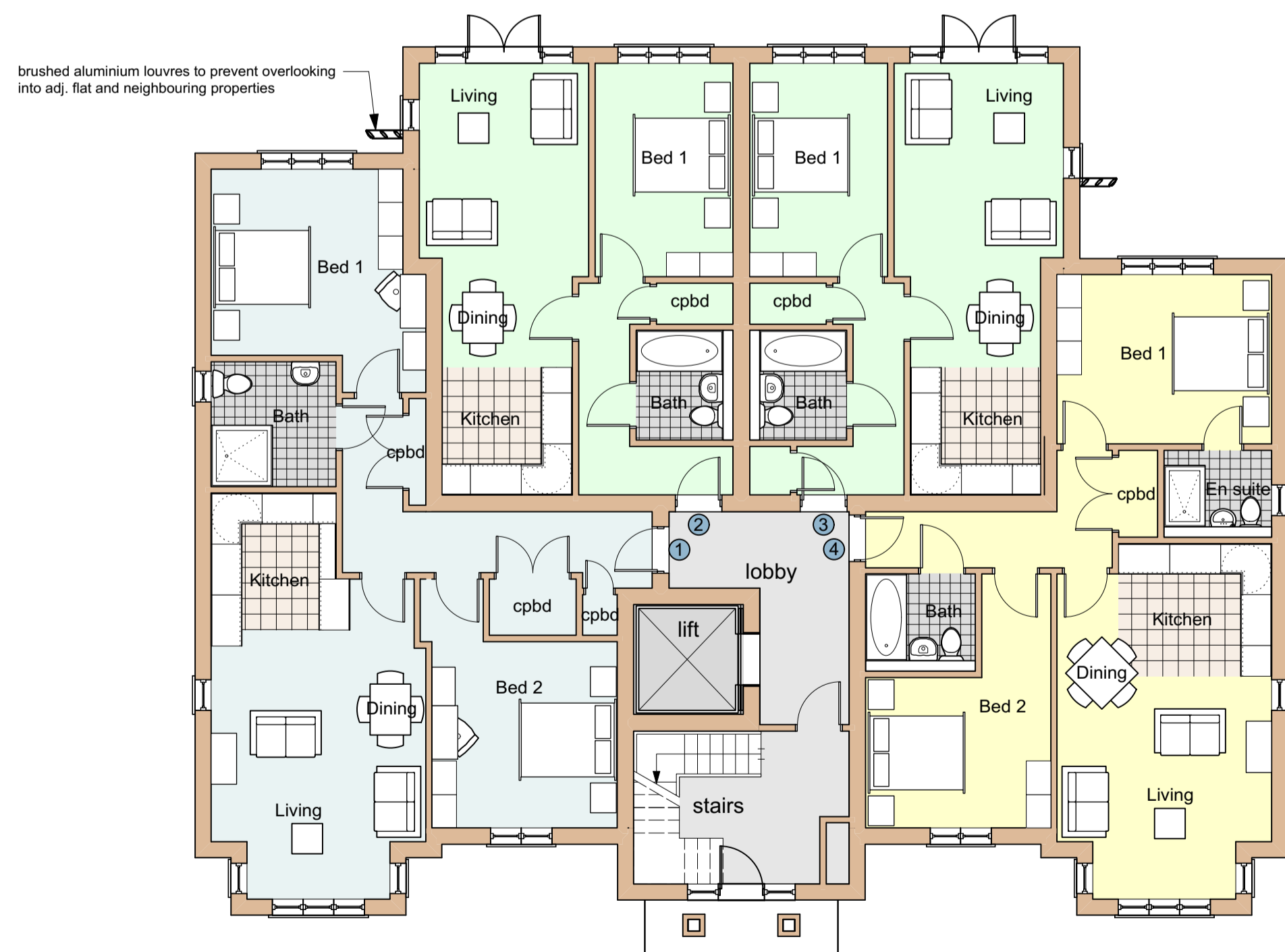
Flat 1 - 82.0 sq. metres (882 sq. ft.) 2 Bed 2 Bath Apartment  
 (NB. This flat is Building Regulations Part M4(3) compliant - Wheelchair user dwelling)

Flats 2 & 3 - 50 sq. metres (538 sq. ft.) 1 Bed 1 Bath Apartment

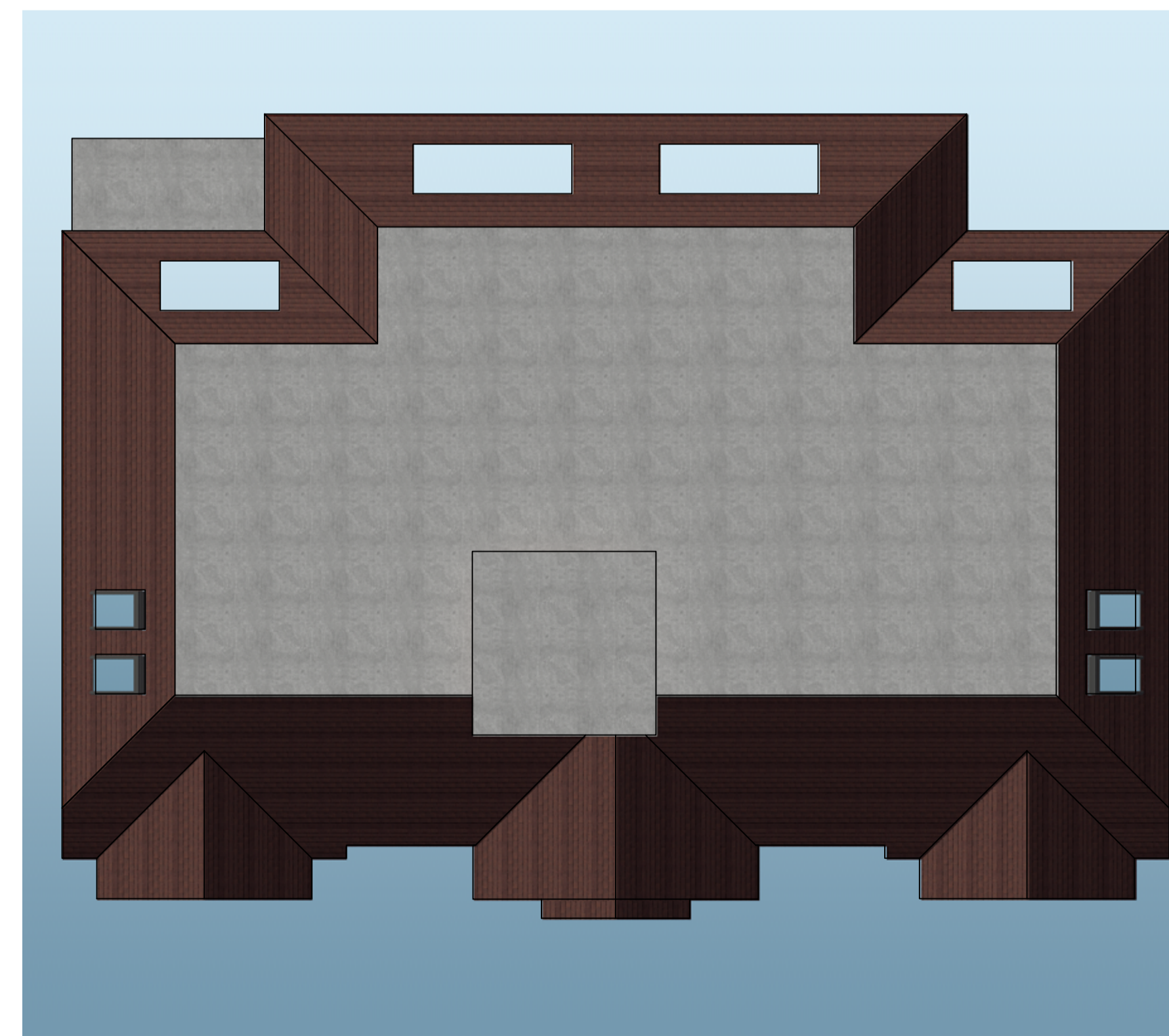
Flats 4, 5, & 7 - 73.18 sq. metres (787 sq. ft.) 2 Bed 2 Bath Apartment

Flats 6, 8 & 9 - 80 sq. metres (861 sq. ft.) 2 Bed 2 Bath Apartment

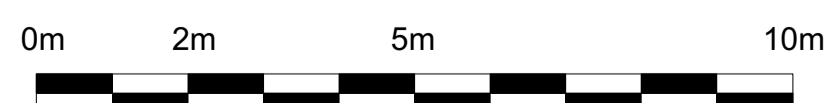
NB. All remaining apartments are Building Regulations Part M4(2) compliant - Accessible & adaptable dwelling



Ground Floor Plan



Roof Plan



Notes:

Health & Safety notes:

rev	revision details	by	date

status: **PLANNING**

client: **Bencwell Properties**

project: **Flat Development**  
 4 Broomfield Rd. Bexleyheath  
 Kent DA6 7PE

title:

Proposed Plans

scale: **1:100 @ A1**

checked: JL date: 21/09/18

originated: JL date: 21/09/18



19 Fobush, Halesworth, East, TN11 9HT  
 Tel: 01793 822158  
 email: info@smartarchitecture.co.uk  
 web: www.smartarchitecture.co.uk

drawing number: revision:

1817 - 07 -



## OTHER APPLICATIONS

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**APPLICATION NO.:** 18/02851/FUL

**ADDRESS:** 4 Broomfield Road, Bexleyheath

**SUMMARY DESCRIPTION:** Demolition of existing dwelling and erection of one 2 storey building to provide 9 residential units comprising 2 x 1 bed and 7 x 2 bed flats. Provision of refuse and cycle storage areas, landscaping, associated car parking spaces and alterations to the highway access.

**APPLICANT:** Bencewell Properties Ltd

### **SUMMARY**

Demolition of existing dwelling and erection of one 2 storey building to provide 9 residential units comprising 2 x1 bed and 7 x 2 bed flats. Provision of refuse and cycle storage areas, landscaping, associated car parking spaces and alterations to the highway access.

### **RECOMMENDATION**

Grant planning permission subject to conditions.

### **REASONS FOR RECOMMENDATION**

The proposed development will provide new residential development that does not harm the character and appearance of the area, provides satisfactory living conditions, amenity space and parking and does not result in any harm in terms of residential amenity or highway safety.

### **NOTE**

This summary is not intended to be a comprehensive review of all the issues in relation to this application.

## **SITE AND SURROUNDINGS**

The site is situated in an area zoned as Primarily Residential in the UDP. The site comprises a large detached dwelling on the northern side of Broomfield Road, approximately 50m to the west of the junction with Gravel Hill. There are no yellow-line waiting restrictions in the vicinity of the site access and most of the properties along this street benefit from on-site parking provision.

The existing dwelling has parking to the front and garden to the rear and side. Broomfield Road comprises a mix of residential buildings including blocks of flats, and large semi-detached dwellings.

To the northwest is no. 82 Gravel Hill; the flank wall of this property abuts the north west boundary of the site. To the east is a detached dwelling (no.2 Broomfield Road) which has a single window at ground floor serving a WC and a pair of windows serving a garage and to the west is a pair of semi-detached dwellings (6-8 Broomfield Road),

## **OTHER APPLICATIONS**

### **APPLICATION NO. 18/02851/FUL (cont'd)**

---

no.6 has windows at ground and first floor. The window at ground floor serves a kitchen.

## **PROPOSAL**

The application seeks to demolish the existing dwelling and construct a two storey detached building. Nine flats will be provided comprising 2 x 1 bedroom flats and 7 x 2 bedroom flats. The access to the site will be centrally located and will lead to a parking court providing 8 car parking spaces.

The bin store will be provided to the east of the car park. A cycle storage shelter will be provided in the rear garden, near to the north-western boundary. A footpath is provided to the west of the proposed dwelling providing direct access from the cycle storage to the front of the building. The building will have a pitched roof, incorporating three gable sections and will be the same height as the properties to the west and follow a similar building line to the front. The building will be finished in traditional materials including brick with some areas of white render. The gables will be tile hung. The main area of communal amenity space is provided to the rear of the building. At the rear of the property, the first floor flats are also provided with balconies. There is a central lift shaft.

## **CONSULTATIONS**

### Highway Authority

The application site is located on the northern side of Broomfield Road approximately 50m west of its junction with the A220 Gravel Hill. Broomfield Road is designated as an unclassified residential major access road under the Councils Unitary Development Plan (UDP) road hierarchy.

There are no yellow-line waiting restrictions near the existing site access although some no waiting at any time restrictions are located around the Gravel Hill junction. Broomfield Road lies to the south of the Bexleyheath Town Centre Controlled Parking Zone (CPZ) area, with on street kerbside possible through most of its length. It is noted that most of the dwellings along this road benefit from an off-street parking provision

The site area is occupied by a four- bed detached property with a vehicular access opening onto Broomfield Road located on the western side of the frontage. A parking area for approximately 4 vehicles is located in-front of the dwelling and a separate single garage attached on the western side of the building. The site has a poor Public Transport Accessibility Level (PTAL) of 2, although a bus stop is located adjacent to the north eastern boundary of the site and amenities, including Bexleyheath Town Centre, are within a reasonable walking distance.

On street parking levels were observed when visited during a weekday afternoon, with regular vehicular movements from/into the existing flat blocks car park access roads on the southern side of Broomfield Road.

## OTHER APPLICATIONS

### APPLICATION NO. 18/02851/FUL (cont'd)

---

The proposal is for the demolition of the existing detached four bed house to construct a two-storey building of 9 Flats - 7x2 bed flats and 2x1 bed flats, with 8 parking spaces located in a courtyard area. The proposed access to the courtyard will be centralised on the boundary onto Broomfield Road and a footpath link provided onto Gravel Hill on the north east side of the development area. The existing access point will be closed off.

The applicant has produced a Transport Statement and an addendum letter to support the application, which have been reviewed by the Highway Authority.

Interrogating of local car ownership census data for flats and maisonette households indicates that a parking demand for 9 vehicles could be created by the development. Overnight on-street parking stress surveys have been undertaken by the applicant which indicate parking stress levels of up to 67% on sections of Broomfield Road with up to 20 spaces being available within 200m of the site. Therefore, it is considered that the proposed parking provision of eight off street spaces is acceptable.

It is considered that the repositioned access point will not significantly increase accident risk in this low speed location, where it is anticipated that vehicles will emerge slowly in accordance with Manual for Streets research which suggests that drivers emerge with care from this size of residential vehicular access opening on a residential road.

It is recommended that suitably worded conditions are imposed to secure an acceptable parking courtyard layout, vehicular access, an acceptable pedestrian route onto Gravel Hill, reinstatement of the existing access point and management of the parking area.

Secure and covered cycle parking should be provided in accordance with London Plan requirements and a suitable recycling store area provided on the site in accordance with suitably worded conditions.

In conclusion, the Highway Authority does not object to the proposed development, subject to the imposition of planning conditions.

#### Environmental Health

No objection subject to conditions.

#### Waste and Recycling

A bin-store is shown located at the front of the site with easy access from Broomfield Road. The bin-store is in an acceptable location. The 'Bin-store Plans and Elevations' document shows that two no. 1100L euro-bins will be accommodated inside the bin-store. This is sufficient capacity for residual waste but there is currently no provision for recycling. A minimum of six no. 240L wheeled bins would be required for recycling storage - comprising two bins for paper, two bins for plastics / cans, one bin for glass and one bin for food waste.

It appears that there will be ample space for expansion of the bin-store in order to accommodate these additional bins.

## **OTHER APPLICATIONS**

### **APPLICATION NO. 18/02851/FUL (cont'd)**

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#### Drainage

No objection subject to an appropriately worded planning condition requiring details of SuDS drainage scheme.

#### Thames Water

No objections subject to informatives.

## **REPRESENTATIONS**

Objections have been received from 5 neighbouring addresses. In summary, the following objections have been raised:

- The development is out of scale
- The plans are not accurate
- A tree is missing off the plan
- Parking area at the front is out of keeping
- Disruption to junction of Broomfield Road/Gravel Hill due to extra traffic
- Overbearing
- Loss of light and privacy
- Proposed windows at rear and balconies result in loss of privacy
- Detrimental impact on road safety and safety of pedestrians
- Impact on family room which is served by window in flank elevation
- Negative impact on sewerage
- Water pressure in the area will be affected
- Noise and disturbance
- Negative visual impact

## **RELEVANT PLANNING HISTORY**

N/A

## **PLANNING POLICIES**

### **Development Plan**

#### **London Plan (2016)**

- 3.1 Ensuring equal life chances for all
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction

## **OTHER APPLICATIONS**

### **APPLICATION NO. 18/02851/FUL (cont'd)**

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- 5.13 Sustainable Drainage
- 5.15 Water use and Supplies
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public Realm
- 7.6 Architecture
- 8.3 Community infrastructure levy

#### **Core Strategy (2012)**

- CS01 – Achieving Sustainable Development
- CS02 – Bexleyheath geographic region
- CS08 – Adapting to and mitigating the effects of climate change. Including flood risk management
- CS10 – Housing Need
- CS18 – Biodiversity

#### **Unitary Development Plan (2004) (saved policies)**

- ENV39 - Quality of the Built Environment
- H1 – Housing Supply
- H3 - Housing Character
- H6 – amenity space
- H7 – privacy, outlook and setting of buildings
- T6 – Transport Network
- T16 – Safety and Convenience of Travel
- T17 – Parking Standards
- T20 – control of on-street parking

#### **Other Material Considerations**

Design for Living (2006)

## **ASSESSMENT**

The key issues to consider include: the principle of the proposed use of the site; the impact on the character and appearance of the locality; the impact on surrounding residential amenity; the quality of accommodation, including amenity space, the impact on the highway, refuse and cycle parking provision and the impact on biodiversity.

## OTHER APPLICATIONS

### APPLICATION NO. 18/02851/FUL (cont'd)

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#### Land Use

The existing building is not regarded as having significant architectural merit and its demolition would therefore be acceptable, subject to a suitable replacement building being secured. Purpose-built flats are not a feature on this side of Broomfield Road, there are however other flatted developments on the south side of Broomfield Road and given that this area is identified as being Primarily Residential in the development plan, the principle of the use of the site for flats is acceptable in that it has the potential to make a small but useful contribution to the London Plan's minimum housing targets for Bexley. Any replacement residential development on this site will be subject to the other relevant development plan policies and other material planning considerations.

#### Impact on character and appearance of the area

Policy ENV39 of the adopted Bexley UDP requires that new development is compatible with the character of the surrounding area and would not adversely affect the street scene by reason of its scale, massing, height, layout, elevational treatment, materials, and intensity of development. In this regard, the proposed development largely respects the existing building line of Broomfield Road. Moreover, the appearance of the building as essentially a two storey structure, with accommodation within the roofspace, is appropriate and in keeping with this part of the street scene.

The building is of a traditional finish, being brick built and having a pitched roof. The inclusion of gables helps the building to assimilate well into the existing street scene. The building is set in from the boundaries with adjacent properties. The ridge height is comparable to the dwellings to the west. It provides parking to the front, with areas of grass each side to soften the appearance of the development. The development retains a large garden area to the rear. As such the proposed development is considered to not conflict with the requirements of Policy ENV39.

It is recommended that a planning condition requiring details of materials to be submitted be included in the decision notice, in order to ensure that the materials are in keeping with the surrounding area and therefore do not result in harm to visual amenity.

#### Impact on neighbouring amenity

Policy ENV39 also requires consideration of the impact of development on residential amenity. In the case of the development proposal the main consideration will be the impact of the development on the immediately adjacent dwellings to the west, north and east.

#### *Impact on no.6 Broomfield*

The main consideration in respect to this property is the impact on the flank windows (eastern elevation), impact on light, consideration as to whether the proposal will be overbearing and potential for loss of privacy.

The side windows of this property, at first floor serve a bathroom and toilet and the window at ground serves a kitchen (this conclusion is made based on letter received

## OTHER APPLICATIONS

### APPLICATION NO. 18/02851/FUL (cont'd)

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from the neighbouring property and from looking at plans previously submitted for no.8 Broomfield, which is the mirror image of no.6). The existing dwelling at the application site is sited closer to the boundary than the proposed, albeit it is noted that there is a single storey element near to the boundary currently.

Given that the existing dwelling is built nearer to the boundary than the proposed, and therefore the outlook is still onto a solid wall, it is considered that the outlook from the kitchen will be no worse than the current situation. The proposal will result in development being nearer to the first floor windows of this property, but as these serve a bathroom and toilet, rather than living rooms, it is not considered to result in sufficient harm to justify refusal of the application.

With regards to the massing/siting of the development it is noted that the proposed development has a rearward projection beyond the rear wall of no.6. Currently, the existing dwelling has a single storey element near to the boundary which follows a similar footprint to the proposed. It is inevitable that with the proposed building being two stories in height, will have a greater impact on the neighbour. However, the building is 2m from the boundary and it is considered that any such impact will be reduced to an acceptable level. With regards to privacy, the windows in the flank elevation that could face directly into the neighbours windows in the flank elevation are proposed to be obscure glazed. These windows serve an ensuite bathroom, and also a bedroom and kitchen living room (secondary windows); balconies to the rear are provided in the middle section of the rear elevation, rather than being immediately adjacent to either boundary. It is however recommended that the east and west flank screens of the balconies are at least 1.7m above floor level and provided with obscure glass. This can be provided for through a relevant planning condition.

It is noted that the building will not project beyond a 45 degree line of site from windows on the rear elevations of the neighbouring property.

#### *Impact on 2 Broomfield Road*

This property has a single window at ground floor in the flank elevation, which serves a WC and a double width window which serves a garage. Similar observations as those set out above can be made in respect to the impact of the development on this property. The proposed development will project rearward of no.2 and the building will be built on an area that is currently part of the garden. However, it is considered that an adequate gap is provided between the proposed building and the boundary, (approximately 4m). It is noted that the building will not project beyond a 45 degree line of site from windows on the rear elevations of the neighbouring property. The windows in the side elevation that face towards no.2 will be obscure glazed. Planning conditions requiring obscure glazing in relation to the flank windows and balcony screens are recommended.

#### *Impact on 82 Gravel Hill*

The flank elevation of this property faces towards the north-western boundary of the application site. The flank elevation has a window at ground floor, which is mainly screened by a close boarded fence that forms the boundary with the application site. As the window is screened by a fence, the proposed development does not result in

## OTHER APPLICATIONS

### APPLICATION NO. 18/02851/FUL (cont'd)

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loss of privacy this property. There is a mature laurel hedge that provides screening near to the boundary with this property.

It is evident from this assessment that the proposed development will not be harmful to the amenities of the adjacent dwellings. In order to address concerns regarding the construction phase, the inclusion of a planning condition requiring the submission and agreement of a demolition/construction methodology is recommended.

#### Quality of Accommodation

Nationally described space standards, incorporated into the London Plan as Table 3.3 Minimum space standards for new dwellings, must be met. The proposal must also conform to the London Plan Housing SPG. The overall unit sizes annotated on the floor plans for the revised scheme for 9 units would meet or exceed minimum requirements, i.e. 50m<sup>2</sup> for a 1 bedroom 2 person unit, and 70m<sup>2</sup> for a 2 bedroom 4 person unit.

All units have been provided with at least one double/twin bedroom of at least 11.5m<sup>2</sup> in size (with a width no less than 2.75m with every other double/twin bedroom having a width of at least 2.55m).

The London Plan Housing SPG strongly encourages floor to ceiling heights of 2.5m, which is 200mm greater than the minimum requirement set out in the nationally described space standards. Section drawings have been submitted which shows that this has been achieved with the ground and first floor having a floor to ceiling height of 2.55 m and the second floor having a floor to ceiling height of 2.6m (except for the eaves).

Built in storage space has been shown on the plans.

Five units are shown to be dual aspect to the front and rear. Two units are dual aspect to the rear and have one window to the side. Two are served by rooflights with roof terraces provided to the rear serving Bedroom 1 and a Living room.

The internal layouts of the residential block should be designed to avoid inappropriate stacking of room types (or be supported by an acoustic report demonstrating that there would be no adverse impact). This has been achieved for the majority of apartments, but it is noted that the flats in the roof have their kitchens directly above bedrooms at first floor.

The site is exposed to elevated levels of road traffic noise. Noise impacts to the proposed new accommodation have been considered and quantitatively assessed. Appropriate mitigation measures will need to be adopted to ensure internal noise levels comply with those specified in BS8233:2014 and, if possible, external amenity levels with WHO guidance. A planning condition is required regarding the provision of noise mitigation measures.



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London Plan Policy 3.8 (Housing Choice) requires that the new homes in all developments will need to meet 'Building Regulation requirement M4 (2)' of being 'accessible and adaptable'.

#### Amenity Space

The Mayor's Housing SPG requires a minimum 5m<sup>2</sup> of private outdoor space for each 1-2 person dwelling plus an extra 1m<sup>2</sup> for each additional occupant. The minimum depth/width of all balconies should be 1.5m. Where there is a shortfall in private amenity space this can be compensated for by significantly exceeding minimum guideline unit sizes in terms of internal floorspace.

In addition to this minimum requirement at the regional policy level, Bexley's Residential Design Guide 'Design for living' recommends that amenity space in flatted developments should be, at a minimum, 45% of the plot area. The agent has advised that the total amenity space (excluding forecourt parking and side flank space) equates to 50.6%.

This is provided as follows:

- Communal amenity space – 489 m<sup>2</sup> (to serve Flats 1, 2, 3, 4, 5 and 7)
- Private balconies 22m<sup>2</sup> – Flat 6
- Private balcony 5.6m<sup>2</sup> - Flat 8
- Private balcony 5.6m<sup>2</sup> - Flat 9

It is noted that private amenity space is not provided for all flats, however the overall requirement exceeds the requirement of 45% of the site area, all but Flats 2 and 3 exceed the minimum space requirements. It is also noted that there is the Hall Place North Park, located within a short walk of the development (at the junction of Midhurst hill/Broomfield Road). Overall the access to amenity space for these flats is therefore considered to be acceptable. As such there is no objection to the proposal on this basis.

#### Highways

Policy T17 of the adopted Bexley UDP 2004 requires that development provide for off street parking up to the maximum levels of parking prescribed in the parking standards set out in Annex 1 of the UDP. The Highways authority has considered car ownership census data (NOMIS) rates for flats and maisonettes surrounding the site and considered the on-street parking spaces available in the overnight parking surveys on Broomfield Road, Gravel Hill Close and Broomhill Rise, and as such it is considered that the proposed provision of eight parking spaces for the proposed nine flats is satisfactory. It is recognised that one or two on street parking spaces will be lost across the frontage of the development by the positioning of the new access opening although one space will be created when the existing access point and kerb line are reinstated.

It is considered that the repositioned access point will not significantly increase accident risk in this low speed location, where it is anticipated that vehicles will emerge slowly in

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### APPLICATION NO. 18/02851/FUL (cont'd)

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accordance with Manual for Streets research which suggests that drivers emerge with care from this size of residential vehicular access opening.

It is recommended that suitably worded conditions are imposed to secure an acceptable parking courtyard layout, vehicular access, an acceptable pedestrian route onto Gravel Hill, reinstatement of the existing access point and management of the parking area.

Secure and covered cycle parking should be provided in accordance with London Plan requirements. An area is shown on the submitted plans and this can be secured by planning condition.

In conclusion, the Highway Authority does not object to the proposed development, subject to the imposition of the required conditions.

#### Refuse and recycling storage

The location of the proposed bin storage area is near the highway and is therefore acceptable from a collection point of view. It is screened from the highway by a 1.8m brick wall to be constructed adjacent to the highway as such it does not detract from the street scene. The Waste Officer has advised that there is sufficient space for storing the appropriate number and types of bins required for this type of development.

#### Impact on trees/biodiversity

There are trees located within, and in close proximity to, the site. A full Arboricultural report, carried out by a suitably qualified and experienced arboriculturalist, has been submitted detailing measures as to how the development will be carried out in such a way as to minimise the impact on existing trees. It is noted that two trees will need to be removed, however these are regarded as category C trees and therefore of not high quality. The proposal incorporates additional planting. It is recommended that planning conditions are included in the decision to require the submission of an Arboricultural Method Statement and the implementation of such, and also a detailed landscaping plan and the future management of the approved scheme.

The site is within 200m of woodland, water and/or large open spaces known to be important for feeding bats. An initial survey regarding biodiversity has been conducted and it is considered that the host building has potential for bats to roost. Planning conditions are recommended to require that further bat surveys are carried out prior to demolition and appropriate mitigation measures are implemented following the surveys in addition to further details regarding enhanced biodiversity measures to be included in the proposed development. The elevation drawings show that bat roosting boxes will be provided in the elevations. Such measures are welcomed.

#### Sustainability

The planning application is supported by an Energy Statement. It is recommended that a planning condition is included in the decision to require compliance with this

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### APPLICATION NO. 18/02851/FUL (cont'd)

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Statement and furthermore a planning condition which requires the installation of Photovoltaic Panels to be installed and retained as recommended in the report.

#### Response to representations

It is considered that many of the key issues raised have been addressed in the above assessment, however further comment is provided hereon. The potential for overlooking can be overcome with the provision of appropriate obscure glazing to flank windows and side walls of balconies. With regards to the issue of water pressure, Thames Water has advised on an informative regarding water pressure and it is recommended that this is included in the decision notice. In relation to the comments regarding no.2 Broomfield Road and that the development cuts it off from the other dwellings, it is considered that as the proposed building respects the general scale and layout of neighbouring properties and therefore is a continuation of the existing street scene. With regards to the point that there could be a tree missing from the plans, the plans have been considered on site, and it is considered that all trees are marked accurately on the plans.

## RECOMMENDATION

### **Grant planning permission subject to the following conditions:**

- 1) The development hereby permitted shall be begun within 3 years from the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004).

- 2) The development hereby permitted shall not be carried out otherwise than in complete accordance with the approved plans, being Drawing No.'s 1817-01'1817-02A; 1817-04A; 1817-07; 1817-08; 1817-09; 1817-10A; 1817-11' 1817-12A; 1817-13; 1817-14, 1817-15 and any approval granted subsequently pursuant to this permission.

Reason: To prevent any unacceptable deviation from the approved plans.

- 3) After demolition, but before above ground works, written details of external materials to be used within the development, including source/ manufacturer of bricks, tiles and cladding materials shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out using the approved external materials.

Reason: In the interests of visual amenity.

- 4) No demolition, construction or ground works shall take place until an Arboricultural Method Statement in accordance with the current edition of BS:

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5837 has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

Reason: This information is required prior to the commencement of demolition, construction or ground works in order to protect existing trees.

- 5) Before development commences a demolition/construction methodology shall be submitted to and approved in writing by the Local Planning Authority, and the development shall not be carried out except in accordance with the approved details, which shall cover the following points:
- i. demolition and construction methods and techniques and deliveries of construction materials.
  - ii. means of minimising noise and vibration (including any piling), and compliance with BS 5228;
  - iii. means of minimising dust and similar emissions, in accordance with Air Quality: Best Practice Guidance - The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance (published by the Greater London Authority, July 2014);
  - iv. construction site lighting; vi. contact arrangements for the public, including 'out of hours' telephone numbers for named contacts).

Reason: In the interests of the amenities of nearby local residents. These details are required at the start of the project as they relate to the demolition/construction works.

- 6) No development shall take place until details of tree protection in accordance with the current edition of BS: 5837 have been submitted to and approved in writing by the Local Planning Authority.

No equipment, machinery or materials shall be brought onto the site prior to the erection of approved barriers and/or ground protection and the approved measures shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed, nor fires lit, within any of the protected areas. No alterations shall be made to the siting of barriers and/or ground protection, nor ground levels changed, nor excavations made within these areas without the prior written consent of the Local Planning Authority.

Reason: To safeguard existing trees to be retained and to ensure a satisfactory setting and external appearance to the development.

- 7) No works shall commence until the bat surveys outlined in the supporting report by Lloydbore, dated 18/10/2018 have been carried out and until a bat mitigation strategy has been submitted to and approved in writing by the Local Planning

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Authority. All works shall then proceed in accordance with the approved strategy.

Reason: To protect the existing population of bats and to improve the habitat for bats on the site.

- 8) Prior to the commencement of site clearance, demolition, construction or above ground works, a scheme for the enhancement of biodiversity on the site shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall take account of any protected species that have been identified on the site and have regard to the enhancement of biodiversity generally. The development shall be implemented in accordance with the approved proposals within it and maintained thereafter.

Reason: To protect and enhance existing species and habitats on the site in the future.

- 9) Prior to the commencement of the development, a scheme for a Sustainable Drainage System shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall include details of:
- a. How reduction in surface water runoff to the greenfield runoff rate shall be achieved;
  - b. Installation of petrol/oil interceptors as necessary;
  - c. Distribution of foul water flows into the surrounding sewer network as necessary;
  - d. Installation of rainfall attenuation units for capturing and reusing water;
  - e. Information about the design storm period and intensity, the method employed to delay and control surface water discharged from the site and measures taken to prevent pollution of the receiving groundwater and/or surface waters;
  - f. Include a timetable for its implementation; and,
  - g. Provide a management and maintenance plan for the lifetime of the development.

The development shall only be carried out in accordance with the approved details.

Reason: To ensure that the site is sustainably drained in accordance with Policy 5.13 of the London Plan (2016). These details are required at an early stage to ensure the drainage measures are factored into the build process.

### **Pre Occupation Conditions**

- 10) Prior to the occupation of the development details of the vehicle access pedestrian sightlines shall be provided for approval by the Local Planning Authority showing those parts of 2.4m x 2.4m pedestrian visibility splays that can be accommodated within the site in both directions and (with the exception of

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existing trees) shall thereafter be maintained free of all obstructions to visibility between heights of 0.6m and 2m above the level of the adjoining highway.

Reason: In the interests of highway and pedestrian safety.

- 11) Prior to the occupation of development details of electric vehicle charging point provision (20% active and 20% passive), conveniently located, shall be submitted to and approved in writing by the Local Planning Authority. The agreed details shall be implemented prior to occupation of the development and shall be permanently maintained and available for use thereafter.

Reason: To accord with the London Plan and in the interests of sustainability. These details are required prior to commencement as the infrastructure will need to be designed and planned with cables and ducting being laid during construction and possibly the electricity supply and/or circuitry being upgraded to suit, which would be difficult to achieve post construction.

- 12) Prior to the occupation of the development details of the finished surface of the parking courtyard, layout of the access onto Broomfield Road, the street lighting installations and the footpath route onto Gravel Hill shall be submitted to and approved in writing by the Local Planning Authority. The access, parking areas, footpath route and street lighting shall be completed in accordance with the approved details before any of the dwellings hereby permitted are first occupied.

Reason: In the interest of the visual amenities of the area and to ensure a satisfactory standard of development.

- 13) Before the first occupation of the building hereby permitted, the windows at first floor in the eastern and western elevations shall be fitted with glass that has been obscured in the manufacturing process to Pilkington level 3 or higher (or equivalent) and shall be non-opening up to a maximum height of 1.7m above internal floor level. The obscured glazing shall be an integral part of the manufacturing process and not a modification or addition made at a later time. The windows shall thereafter be retained as such.

Reason: To protect the residential amenities of adjacent dwellings.

- 14) Before the first occupation of the building hereby permitted, details of the proposed side elevations of the proposed terraces/balconies shall be submitted and approved in writing by the local planning authority. If the walls are to be constructed, in part, of glass, this shall be glass that has been obscured in the manufacturing process to Pilkington level 3 or higher (or equivalent) up to a minimum height of 1.7m above internal floor level. The obscured glazing shall be an integral part of the manufacturing process and not a modification or addition made at a later time. The walls will be retained in accordance with the approved plans.

Reason: to protect the residential amenities of adjacent dwellings.

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- 15) Before first occupation of the development hereby approved, the refuse storage facilities and screening shall be completed in accordance with the approved details and thereafter retained.

Reason: To facilitate the collection of refuse, preserve visual amenity and to reduce the occurrence of pests.

- 16) Prior to the occupation of development, details of Photovoltaic (PV) roof installation shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that the roof's PV potential has been fully utilised. The details shall include the location of the PV array and provide confirmation of the estimated area, output and electricity generation. The approved scheme shall be implemented prior to first occupation of any of the uses hereby approved in accordance with approved details and remain in-situ and operational.

Reason: In order to maximise the PV provision and the renewable energy generation on-site and in the interests of reducing carbon in accordance with Policy 5.2 of the London Plan.

- 17) Prior to the occupation of the development details of acoustically rated glazing and ventilators shall be submitted to and agreed in writing by the Local Planning Authority.

The details shall demonstrate that the level of protection to all habitable rooms will be sufficient to achieve the internal levels specified in BS8233: 2014 and be in accordance with recommended specification in acoustic assessment produced by MRL Acoustics, Report No: MRL/100/1389.1v1, dated October 2018. None of the residential units within the building shall be occupied until such time as the approved measures have been implemented.

Reason: In order to protect the occupiers of the dwellings from undue disturbance by noise.

- 18) Before any part of the development is first occupied details of secure, covered and conveniently located parking facilities for 16 bicycles shall be submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be installed before the development is first occupied and shall be permanently maintained as such thereafter.

Reason: To ensure a satisfactory standard of development and to promote the use of sustainable modes of transport.

- 19) Prior to occupation of the development details of a scheme for the allocation of the car parking spaces shall be submitted to and approved in writing by the Local Planning Authority. The car parking shall operate in accordance with the approved scheme.

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Reason: In order to avoid development without adequate parking, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

- 20) Prior to occupation of the development the existing access opening and adjacent footway vehicular crossover shall be removed and reinstated in accordance with details submitted to and agreed by the Local Planning authority.

Reason: In the interests of highway and pedestrian safety.

- 21) Prior to occupation of the development details of hard and soft landscaping (which may include entirely new planting, retention of existing planting or a combination of both) shall be submitted to and approved in writing by the Local Planning Authority.

The approved landscaping scheme shall be carried out fully prior to the first occupation of the development. Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species unless the Local Planning Authority give prior written consent to any variation.

Reason: In the interests of visual amenity and to preserve and enhance biodiversity.

- 22) Prior to above groundworks, details of screen walls and fences shall be submitted to and approved in writing by the local planning authority and such walls and fences shall be erected prior to occupation and thereafter maintained.

Reason: In the interest of the visual amenities of the area.

- 23) Prior to occupation of the residential units hereby approved, evidence shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that all the residential units have been built to Building Regulation requirement 'M4 (2): Accessible and adaptable dwellings'. Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.

Reason: In order to ensure that the development provides (or can be adapted to provide) satisfactory accommodation for people whose mobility is impaired, and to accord with London Plan Policies 3.5 and 3.8.

- 24) Before occupation of each dwelling, that dwelling shall comply with Building Regulations Optional Requirement Approved Document G2 – Water efficiency (2015 edition). Before occupation evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full



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Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.

Reason: To comply with London Plan Policy 5.15.

#### **Compliance Condition**

- 25) The development shall be carried out in accordance with the Energy Statement report dated September 2018 and undertaken by Energy Test.

Reason: In the interests of reducing carbon in accordance with Policy 5.2 of the London Plan and Policy CS01 of the Bexley Core Development Strategy.

#### **Informative(s):**

- 1) The applicant should be advised to contact the Council Street Services division to arrange construction of the proposed vehicular crossover onto Broomfield Road.
- 2) The implementation of this planning permission will require the assignment of a postal number(s). The Council, as the Local Street Naming and Numbering Authority, are responsible for approving new road names, assigning postal numbers and entering the information on the National Land & Property Gazetteer, a national database of address information. An application must be submitted to the Council at the earliest opportunity, to ensure that any new number(s) are assigned before the development is occupied. A fee will be required for this service (see Bexley Council's web site for details or telephone 0203 045 5732).
- 3) Thames Water should be consulted regarding any new sewer connections, sewer capacities and to arrange the new water supplies and the new water meters. If the new building works are within 3 metres of a Thames Water operated/maintained lateral foul sewer, then permission will also need to be sought from Thames Water.
- 4) The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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- 5) A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."
- 6) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](http://thameswater.co.uk/buildingwater).
- 7) In view of the nature of the development proposed, the applicant is strongly advised to discuss the fire precautions to be implemented as part of the development including the use of a sprinkler system and hard wired smoke alarms with the Council's Building Control Manager (Tel 020 3045 4341).

----- END -----

To: **Bencewell Properties Ltd**  
**C/o Boyer, Mr B Pattison**  
**2nd Floor 24 Southwark Bridge Road**  
**London**  
**SE1 9HF**

**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)**  
**(ENGLAND) ORDER 2015**

**GRANT OF PERMISSION TO DEVELOP  
LAND SUBJECT TO CONDITIONS**

Reference Code :  
**18/02851/FUL**

**TAKE NOTICE** that Bexley Council, the Local Planning Authority under the Town and Country Planning Acts, **HAS GRANTED PERMISSION** for the development of land situated at :

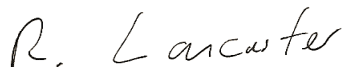
4 Broomfield Road  
Bexleyheath  
Kent  
DA6 7PA

For Demolition of existing dwelling and erection of one 2 storey building to provide 9 residential units comprising 2 x 1 bed and 7 x 2 bed flats. Provision of refuse and cycle storage areas, landscaping, associated car parking spaces and alterations to the highway access.

Referred to in the application for permission for development received on 8th November 2018.

**SUBJECT TO THE CONDITIONS** as attached.

**Date of Decision: 4th March 2019**



**Head of Development Management**

**CONDITIONS AND REASONS**

- 1 The development to which this permission relates must be begun not later than the expiration of two years from the final approval of the details referred to in Condition 1 above, or in the case of approval on different dates, the final approval of the last such matter to be approved.

**Reason:** To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004).

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the approved plans, being Drawing No.'s 1817-01; 1817-02A; 1817-04A; 1817-07; 1817-08; 1817-09; 1817-10A; 1817-11; 1817-12A; 1817-13; 1817-14; 1817-15 and any approval granted subsequently pursuant to this permission.

**Reason:** To prevent any unacceptable deviation from the approved plans.

- 3 After demolition, but before above ground works, written details of external materials to be used within the development, including source/ manufacturer of bricks, tiles and cladding materials shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out using the approved external materials.

**Reason:** In the interests of visual amenity.

- 4 No demolition, construction or ground works shall take place until an Arboricultural Method Statement in accordance with the current edition of BS: 5837 has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

**Reason:** This information is required prior to the commencement of demolition, construction or ground works in order to protect existing trees.

- 5 Before development commences a demolition/construction methodology shall be submitted to and approved in writing by the Local Planning Authority, and the development shall not be carried out except in accordance with the approved details, which shall cover the following points:
- i. demolition and construction methods and techniques and deliveries of construction materials.
  - ii. means of minimising noise and vibration (including any piling), and compliance with BS 5228;
  - iii. means of minimising dust and similar emissions, in accordance with Air Quality: Best Practice Guidance - The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance (published by the Greater London Authority, July 2014);
  - iv. construction site lighting; vi. contact arrangements for the public, including 'out of hours' telephone numbers for named contacts).

**Reason:** In the interests of the amenities of nearby local residents. These details are required at the start of the project as they relate to the demolition/construction works.

- 6 No development shall take place until details of tree protection in accordance with the current edition of BS: 5837 have been submitted to and approved in writing by the Local Planning Authority.

No equipment, machinery or materials shall be brought onto the site prior to the erection of approved barriers and/or ground protection and the approved measures shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed, nor fires lit, within any of the protected areas. No alterations shall be made to the siting of barriers and/or ground protection, nor ground levels changed, nor excavations made within these areas without the prior written consent of the Local Planning Authority.

**Reason:** To safeguard existing trees to be retained and to ensure a satisfactory setting and external appearance to the development.

- 7 No works shall commence until the bat surveys outlined in the supporting report by Lloydbore, dated 18/10/2018 have been carried out and until a bat mitigation strategy has been submitted to and approved in writing by the Local Planning Authority. All works shall then proceed in accordance with the approved strategy.

**Reason:** To protect the existing population of bats and to improve the habitat for bats on the site.

- 8 Prior to the commencement of site clearance, demolition, construction or above ground works, a scheme for the enhancement of biodiversity on the site shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall take account of any protected species that have been identified on the site and have regard to the enhancement of biodiversity generally. The development shall be implemented in accordance with the approved proposals within it and maintained thereafter.

**Reason:** To protect and enhance existing species and habitats on the site in the future.

- 9 Prior to the commencement of the development, a scheme for a Sustainable Drainage System shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall include details of:

- a. How reduction in surface water runoff to the greenfield runoff rate shall be achieved;
- b. Installation of petrol/oil interceptors as necessary;
- c. Distribution of foul water flows into the surrounding sewer network as necessary;
- d. Installation of rainfall attenuation units for capturing and reusing water;
- e. Information about the design storm period and intensity, the method employed to delay and control surface water discharged from the site and measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- f. Include a timetable for its implementation; and,
- g. Provide a management and maintenance plan for the lifetime of the development.

The development shall only be carried out in accordance with the approved details.

**Reason:** To ensure that the site is sustainably drained in accordance with Policy 5.13 of the London Plan (2016). These details are required at an early stage to ensure the drainage measures are factored into the build process.

- 10 Prior to the occupation of the development details of the vehicle access pedestrian sightlines shall be provided for approval by the Local Planning Authority showing those parts of 2.4m x 2.4m pedestrian visibility splays that can be accommodated within the site in both directions and (with the exception of existing trees) shall thereafter be

maintained free of all obstructions to visibility between heights of 0.6m and 2m above the level of the adjoining highway.

**Reason:** In the interests of highway and pedestrian safety.

- 11 Prior to the occupation of development details of electric vehicle charging point provision (20% active and 20% passive), conveniently located, shall be submitted to and approved in writing by the Local Planning Authority. The agreed details shall be implemented prior to occupation of the development and shall be permanently maintained and available for use thereafter.

**Reason:** To accord with the London Plan and in the interests of sustainability. These details are required prior to commencement as the infrastructure will need to be designed and planned with cables and ducting being laid during construction and possibly the electricity supply and/or circuitry being upgraded to suit, which would be difficult to achieve post construction.

- 12 Prior to the occupation of the development details of the finished surface of the parking courtyard, layout of the access onto Broomfield Road, the street lighting installations and the footpath route onto Gravel Hill shall be submitted to and approved in writing by the Local Planning Authority. The access, parking areas, footpath route and street lighting shall be completed in accordance with the approved details before any of the dwellings hereby permitted are first occupied.

**Reason:** In the interest of the visual amenities of the area and to ensure a satisfactory standard of development.

- 13 Before the first occupation of the building hereby permitted, the windows at first floor in the eastern and western elevations shall be fitted with glass that has been obscured in the manufacturing process to Pilkington level 3 or higher (or equivalent) and shall be non-opening up to a maximum height of 1.7m above internal floor level. The obscured glazing shall be an integral part of the manufacturing process and not a modification or addition made at a later time. The windows shall thereafter be retained as such.

**Reason:** To protect the residential amenities of adjacent dwellings.

- 14 Before the first occupation of the building hereby permitted, details of the proposed side elevations of the proposed terraces/balconies shall be submitted and approved in writing by the Local Planning Authority. If the walls are to be constructed, in part, of glass, this shall be glass that has been obscured in the manufacturing process to Pilkington level 3 or higher (or equivalent) up to a minimum height of 1.7m above internal floor level. The obscured glazing shall be an integral part of the manufacturing process and not a modification or addition made at a later time. The walls will be retained in accordance with the approved plans.

**Reason:** to protect the residential amenities of adjacent dwellings.

- 15 Before first occupation of the development hereby approved, the refuse storage facilities and screening shall be completed in accordance with the approved details and thereafter retained.

**Reason:** To facilitate the collection of refuse, preserve visual amenity and to reduce the occurrence of pests.

- 16 Prior to the occupation of development, details of Photovoltaic (PV) roof installation shall be submitted to and approved in writing by the Local Planning Authority to demonstrate

that the roof's PV potential has been fully utilised. The details shall include the location of the PV array and provide confirmation of the estimated area, output and electricity generation. The approved scheme shall be implemented prior to first occupation of any of the uses hereby approved in accordance with approved details and remain in-situ and operational.

**Reason:** In order to maximise the PV provision and the renewable energy generation on-site and in the interests of reducing carbon in accordance with Policy 5.2 of the London Plan.

17 Prior to the occupation of development, details of Photovoltaic (PV) roof installation shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that the roof's PV potential has been fully utilised. The details shall include the location of the PV array and provide confirmation of the estimated area, output and electricity generation. The approved scheme shall be implemented prior to first occupation of any of the uses hereby approved in accordance with approved details and remain in-situ and operational.

**Reason:** In order to maximise the PV provision and the renewable energy generation on-site and in the interests of reducing carbon in accordance with Policy 5.2 of the London Plan.

18 Before any part of the development is first occupied details of secure, covered and conveniently located parking facilities for 16 bicycles shall be submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be installed before the development is first occupied and shall be permanently maintained as such thereafter.

**Reason:** To ensure a satisfactory standard of development and to promote the use of sustainable modes of transport.

19 Prior to occupation of the development details of a scheme for the allocation of the car parking spaces shall be submitted to and approved in writing by the Local Planning Authority. The car parking shall operate in accordance with the approved scheme.

**Reason:** In order to avoid development without adequate parking, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

20 Prior to occupation of the development the existing access opening and adjacent footway vehicular crossover shall be removed and reinstated in accordance with details submitted to and agreed by the Local Planning authority.

**Reason:** In the interests of highway and pedestrian safety.

21 Prior to occupation of the development details of hard and soft landscaping (which may include entirely new planting, retention of existing planting or a combination of both) shall be submitted to and approved in writing by the Local Planning Authority.

The approved landscaping scheme shall be carried out fully prior to the first occupation of the development. Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species unless the Local Planning Authority give prior written consent to any variation.

**Reason:** In the interests of visual amenity and to preserve and enhance biodiversity.

22 Prior to above groundworks, details of screen walls and fences shall be submitted to and approved in writing by the local planning authority and such walls and fences shall be erected prior to occupation and thereafter maintained.

**Reason:** In the interest of the visual amenities of the area.

23 Prior to occupation of the residential units hereby approved, evidence shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that all the residential units have been built to Building Regulation requirement 'M4 (2): Accessible and adaptable dwellings'. Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.

**Reason:** In order to ensure that the development provides (or can be adapted to provide) satisfactory accommodation for people whose mobility is impaired, and to accord with London Plan Policies 3.5 and 3.8.

24 Before occupation of each dwelling, that dwelling shall comply with Building Regulations Optional Requirement Approved Document G2 - Water efficiency (2015 edition). Before occupation evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.

**Reason:** To comply with London Plan Policy 5.15.

25 The development shall be carried out in accordance with the Energy Statement report dated September 2018 and undertaken by Energy Test.

**Reason:** In the interests of reducing carbon in accordance with Policy 5.2 of the London Plan and Policy CS01 of the Bexley Core Development Strategy.

### **INFORMATIVES** :-

1 The applicant should be advised to contact the Council Street Services division to arrange construction of the proposed vehicular crossover onto Broomfield Road.

2 The implementation of this planning permission will require the assignment of a postal number(s). The Council, as the Local Street Naming and Numbering Authority, are responsible for approving new road names, assigning postal numbers and entering the information on the National Land & Property Gazetteer, a national database of address information. An application must be submitted to the Council at the earliest opportunity, to ensure that any new number(s) are assigned before the development is occupied. A fee will be required for this service (see Bexley Council's web site for details or telephone 0203 045 5732).

3 Thames Water should be consulted regarding any new sewer connections, sewer capacities and to arrange the new water supplies and the new water meters. If the new building works are within 3 metres of a Thames Water operated/maintained lateral foul sewer, then permission will also need to be sought from Thames Water.

4 The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater



Court, Vastern Road, Reading, Berkshire RG1 8DB

5 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

6 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](http://thameswater.co.uk/buildingwater).

7 In view of the nature of the development proposed, the applicant is strongly advised to discuss the fire precautions to be implemented as part of the development including the use of a sprinkler system and hard wired smoke alarms with the Council's Building Control Manager (Tel 020 3045 4341).

8 If you are employing a trader/company to carry out work at your home or premises make sure they have a Waste Carrier's License if they are to dispose of the waste resulting from the work.

If you do not ask to see and make a note of their Waste Carrier's License you are not carrying out your Duty of Care and can be fined up to £5000.00 if the waste is then found fly-tipped. The license details, including expiry date, can be checked on the Environment Agency website for free <https://environment.data.gov.uk/public-register/view/search-waste-carriers-brokers> or you can phone directly on 08708 506 506.

i) You must ensure your waste is secured safely and securely and prevent it from causing environmental pollution or harming anyone.

ii) For each load of waste taken you need to be supplied with full waste transfer notes from the registered carrier.

### **PLEASE NOTE**

In dealing with this planning application, Bexley Council has worked with the applicant in a positive and proactive manner, in accordance with the requirements of paragraphs 186 & 187 of the National Planning Policy Framework, to seek solutions to problems where practicable. Detailed advice is available in the form of the Council's Development Plan as well as in the Mayor of London's and Bexley Council's Supplementary Planning Documents and Guidance. The Council also offers a full pre-application service that is available to all applicants to assist in formulating their proposals.

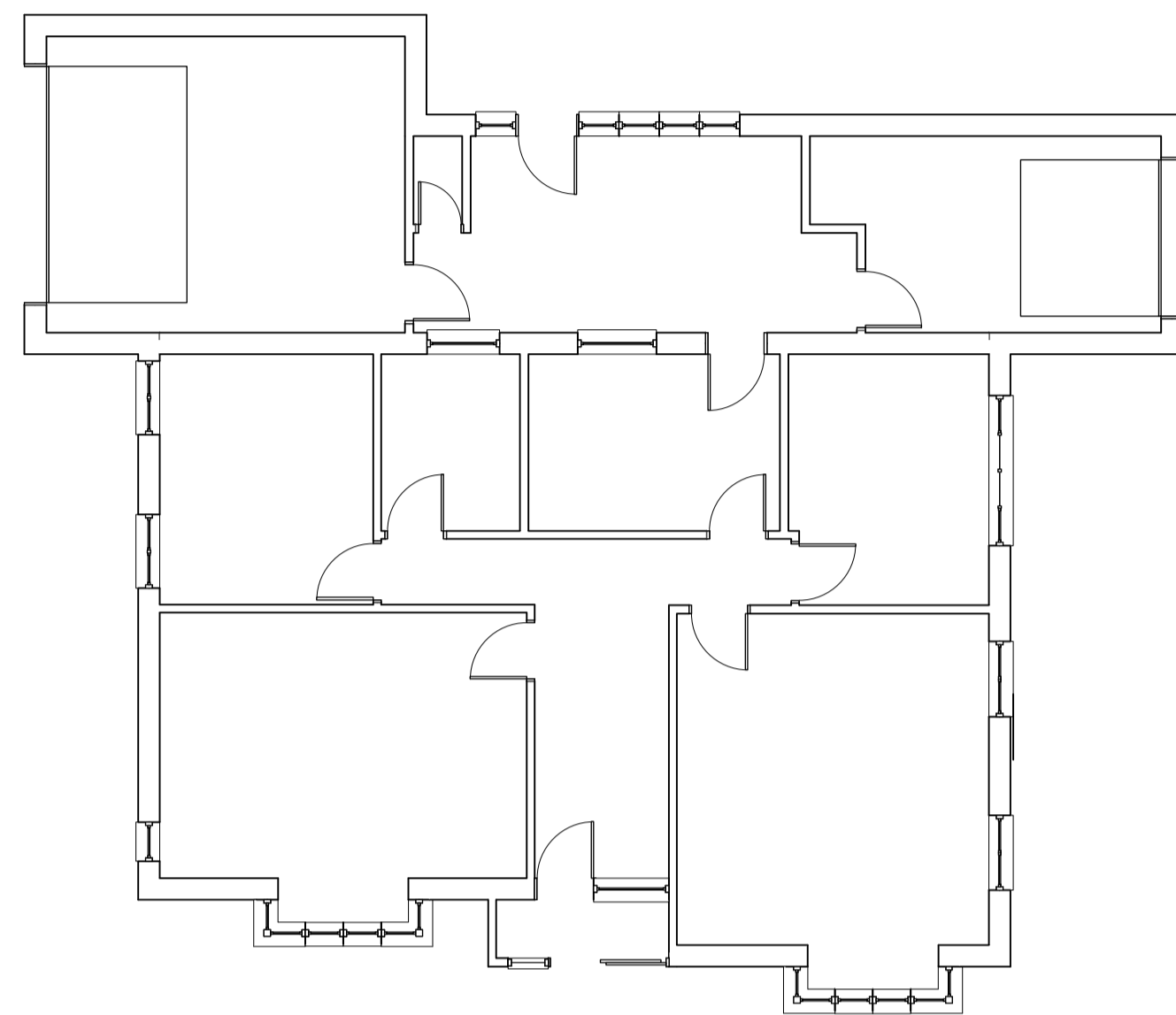
### **APPEALS**

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or if granted subject to conditions, then you can appeal to the Secretary of State. More details of the time limits for appeals and how you go about appealing along with Purchase Notices can be found on the following websites:

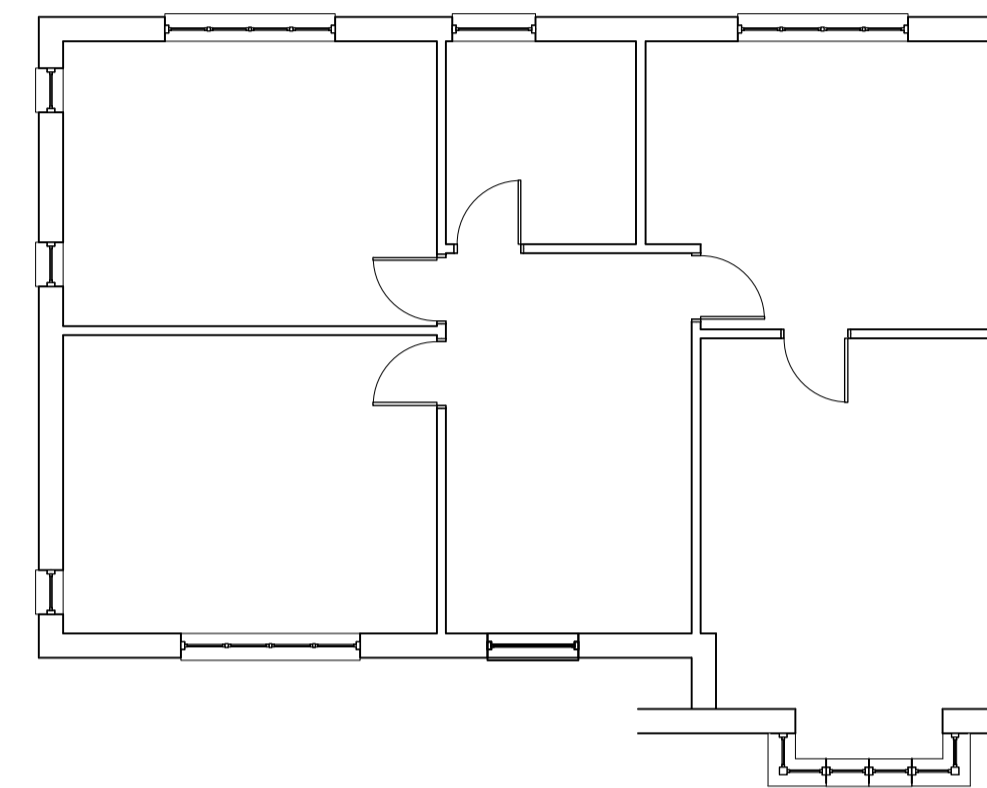
<https://www.gov.uk/government/organisations/planning-inspectorate>

<https://www.planningportal.co.uk/info/200207/appeals>

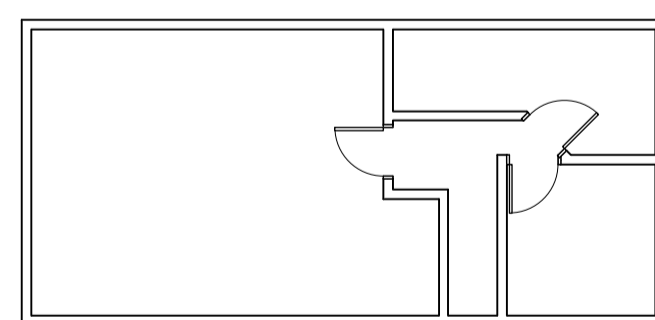
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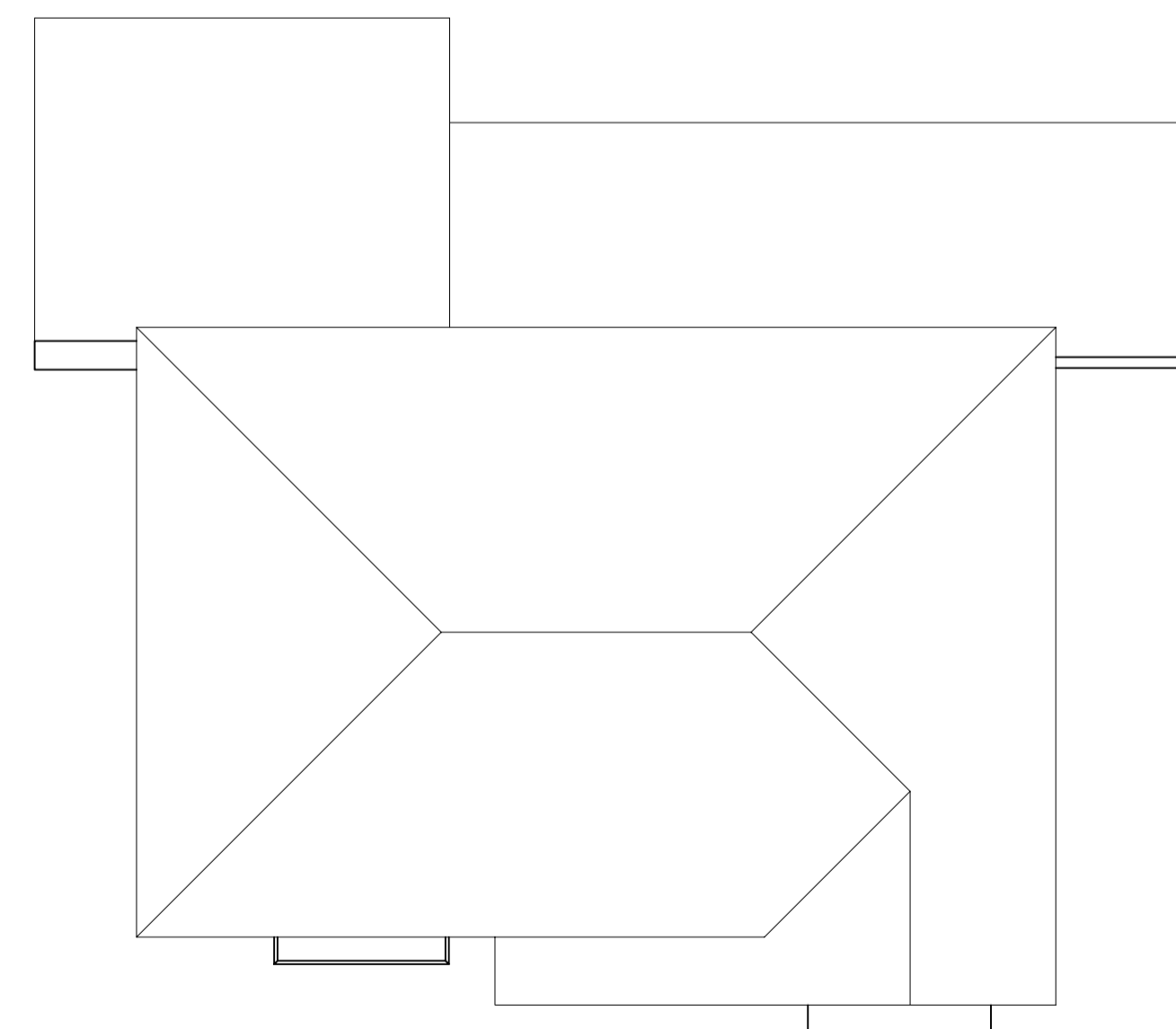
Existing Ground Floor Plan



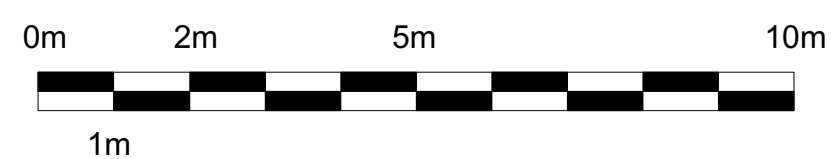
Existing First Floor Plan



Existing Roofspace Plan



Existing Roof Plan



**Notes:**

**Health & Safety notes:**

rev	revision details	by	date

**status:** **PLANNING**

**client:** **Bencewell Properties**

**project:** **Flat Development**  
 4 Broomfield Rd. Bexleyheath  
 Kent DA6 7PD

**title:** **Existing Plans**

**scale:** **1:100 @ A1**

**checked:** JL **date:** 01/10/18

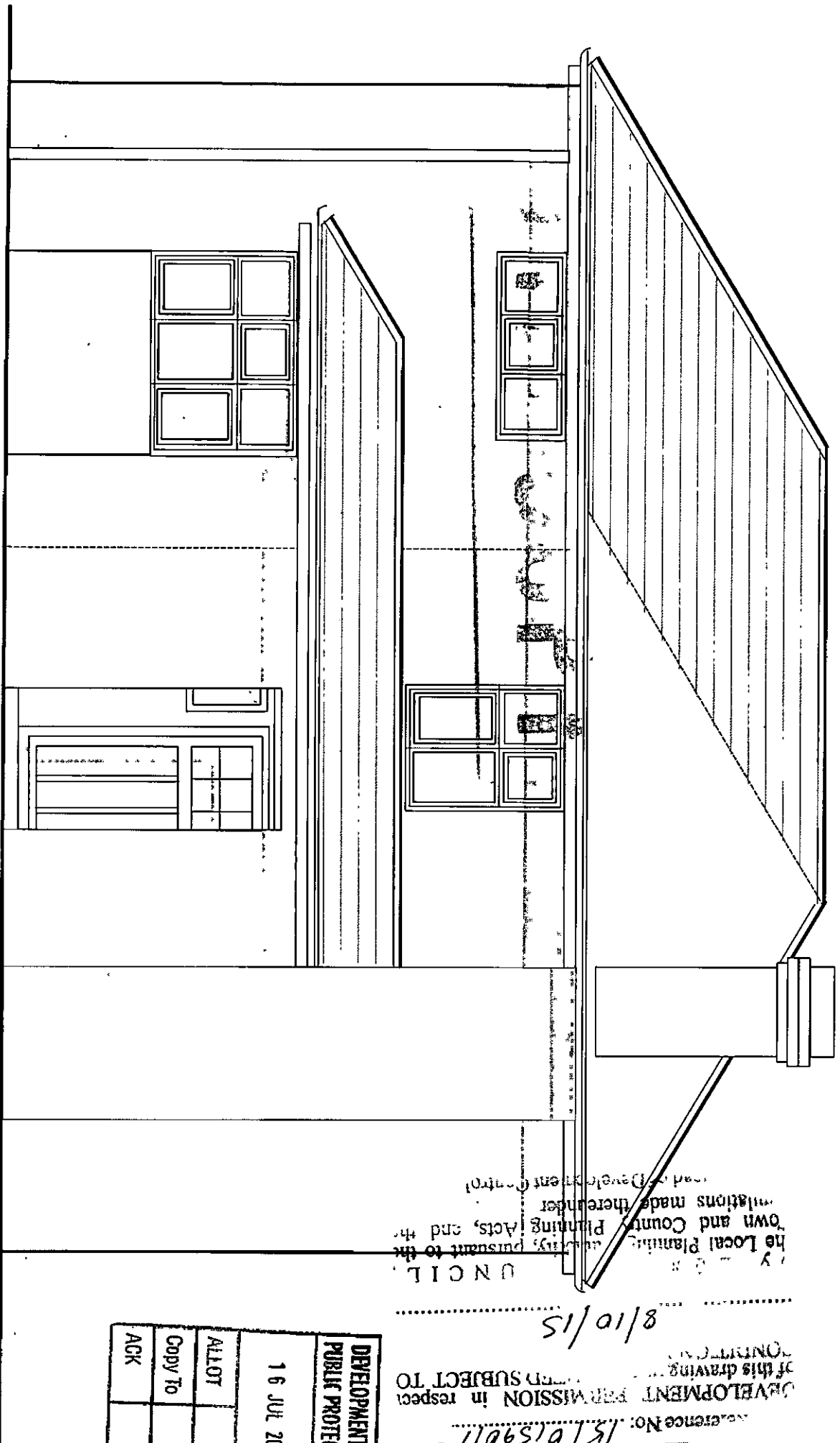
**originated:** OL **date:** 01/10/18



**drawing number:** **1817 - 05** **revision:** -

# APPENDIX 12





proposed north west elevation

Proposed Extension to 1 Danson Mead, Welling, DA16 1RU

Scheme C

for R A Knight

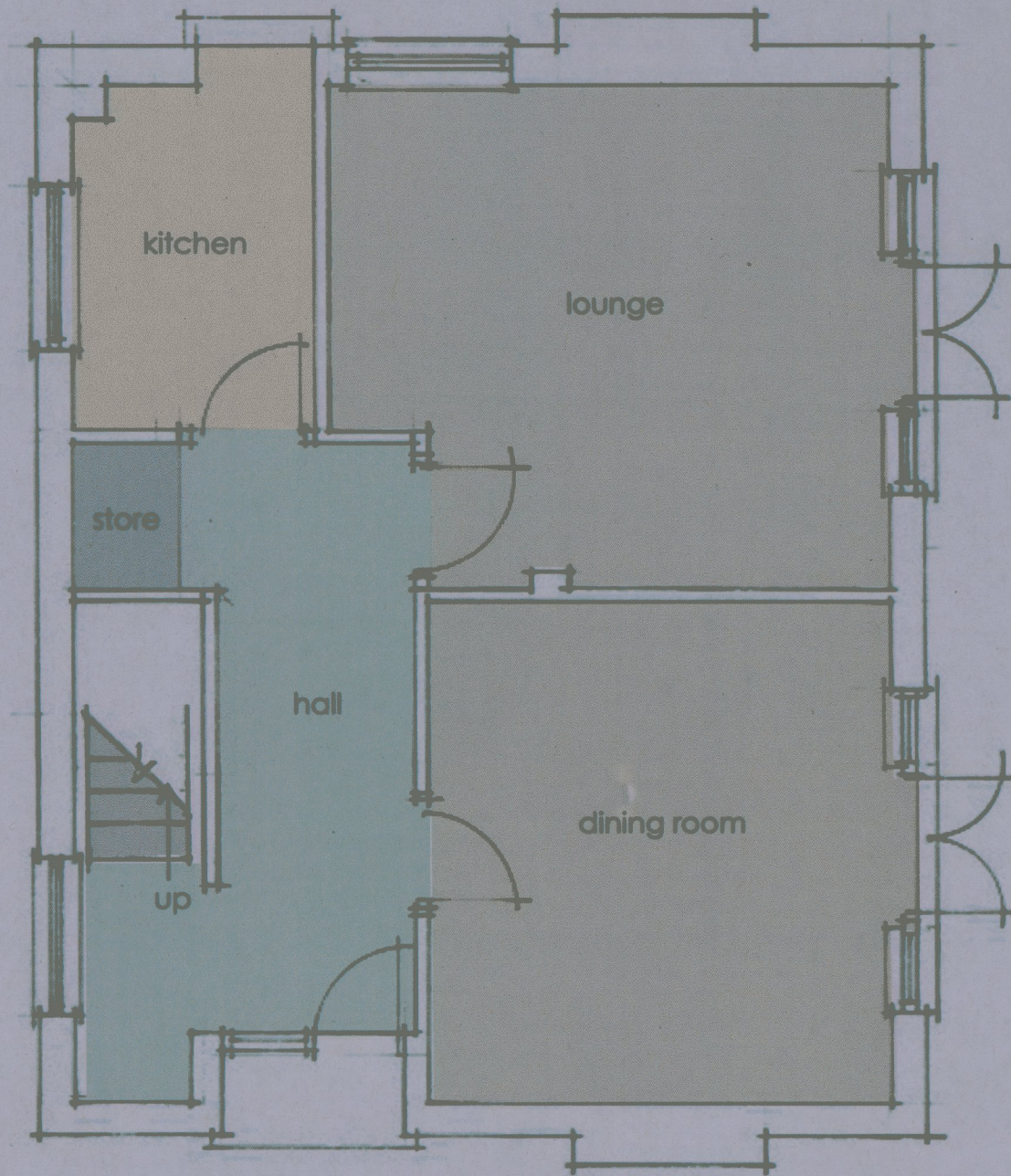
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15/01590  
FUL

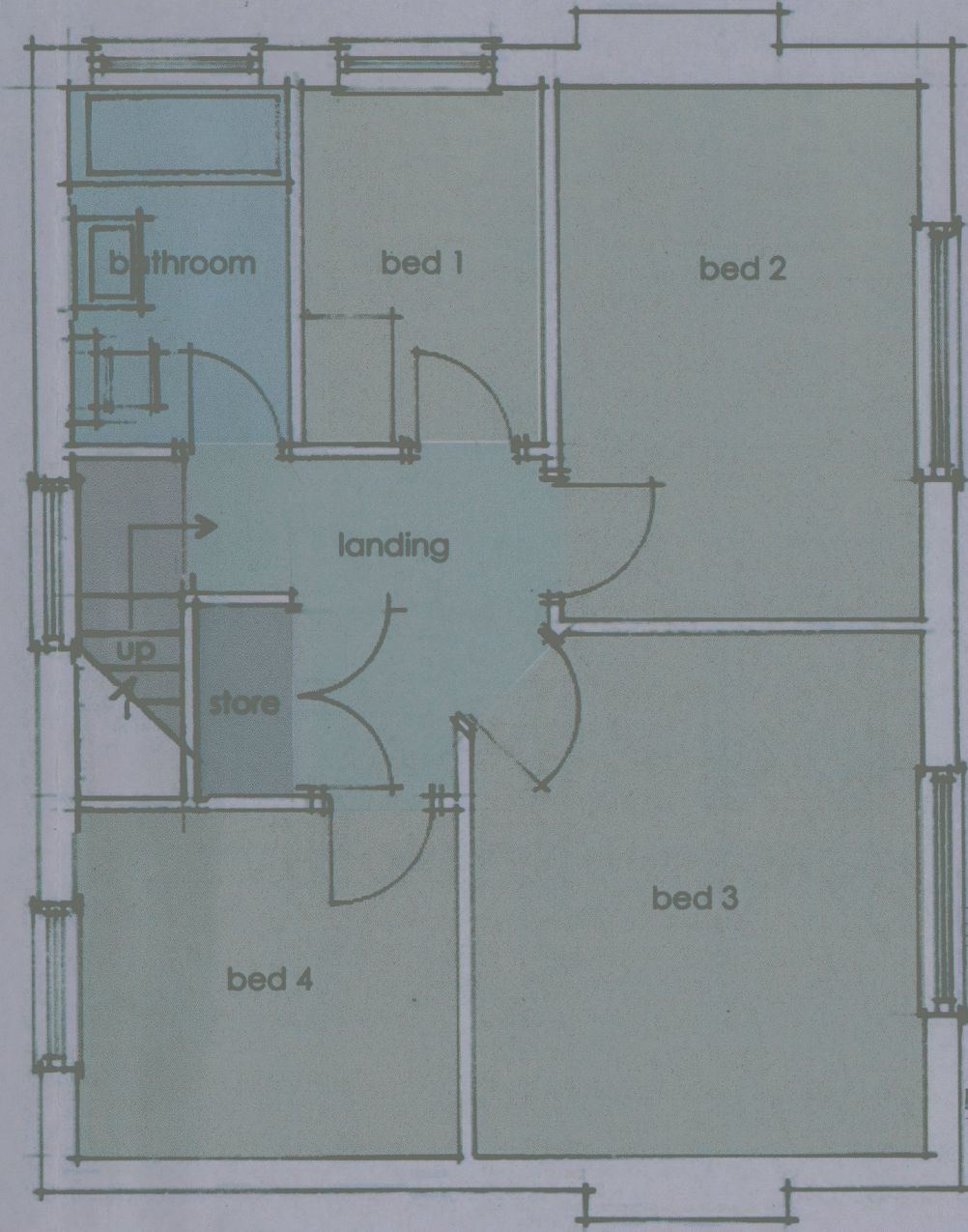
UNCL  
the Local Planning Authority, pursuant to the  
Town and County Planning Acts, and the  
conditions made thereunder  
and Development Control

8/10/15  
DEVELOPMENT PERMISSION in respect  
of this drawing  
Reference No: 15/01590/R  
BEALEY COUNCIL

<b>DEVELOPMENT AND PUBLIC PROTECTION</b>	
16 JUL 2015	
ALLOT	
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existing ground floor plan



existing first floor plan

BEXLEY COUNCIL  
 Reference No: *15/01590/6*  
 DEVELOPMENT PERMISSION in respect  
 of this drawing was GRANTED SUBJECT TO  
 CONDITIONS

*8/10/15*

By BEXLEY COUNCIL,  
 the Local Planning Authority, pursuant to the  
 Town and Country Planning Acts, and the  
 regulations made thereunder  
 Head of Development Control

Proposed Extension to

1 Danson Mead,  
 Welling, DA16 1RU

for R A Knight

scale 1 : 50 @ A3

September 2014

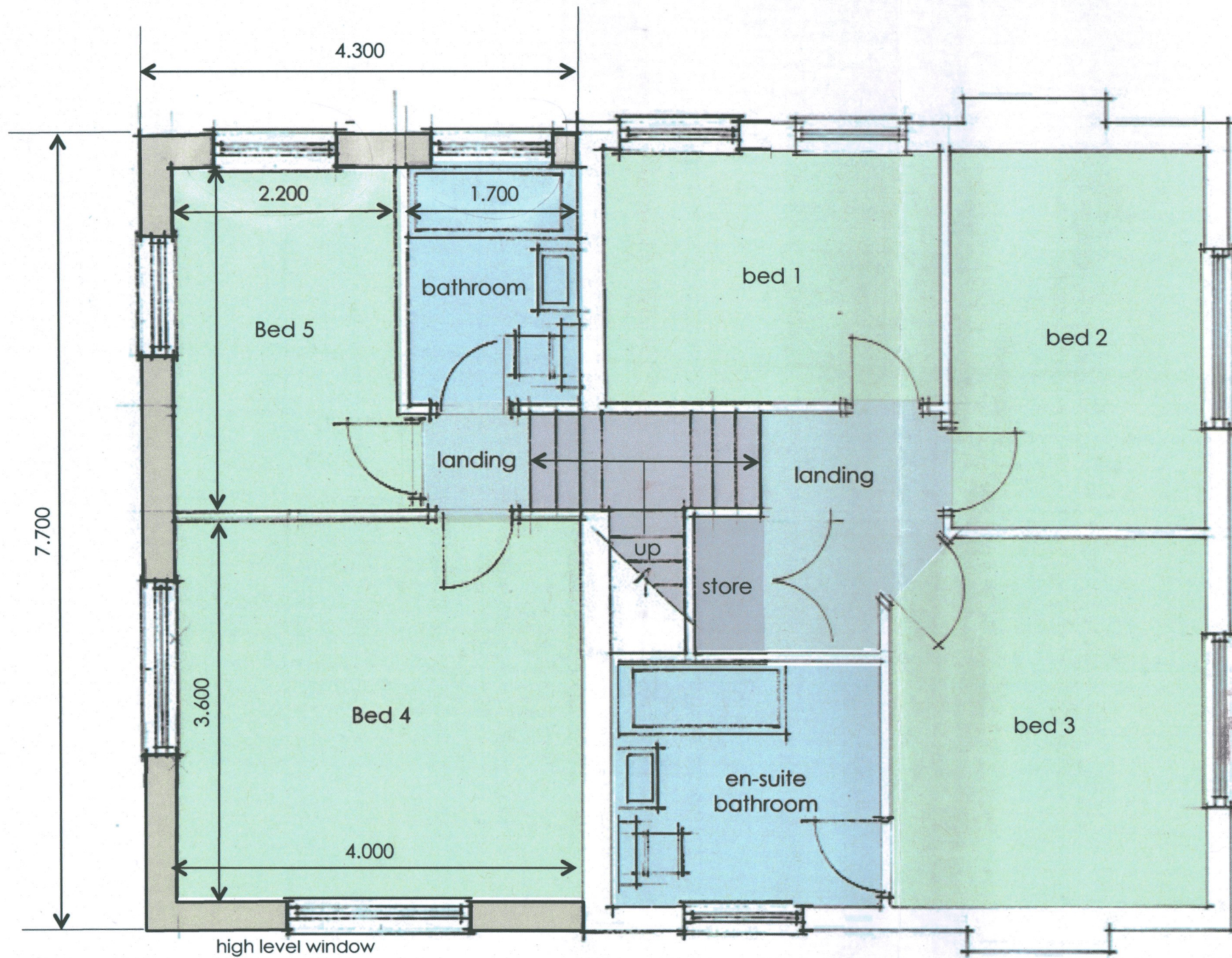
15/01590 FUI

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Scale

1:50		0-3m
1:100		0-6m
1:200		0-12m

DEVELOPMENT AND PUBLIC PROTECTION	
16 JUL 2015	
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~~existing~~ <sup>Proposed</sup> first floor plan as proposed

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Scale	Bar	Length
1:50		0-3m
1:100		0-6m
1:200		0-12m

BEXLEY COUNCIL

Reference No: 15/01590/R

DEVELOPMENT PERMISSION in respect of this drawing was GRANTED SUBJECT TO CONDITIONS

8/10/15

By BEXLEY COUNCIL, the Local Planning Authority, pursuant to the Town and Country Planning Acts, and the regulations made thereunder  
Head of Development Control

FILE COPY

15/01590 FUL

Proposed Extension to  
1 Danson Mead,  
Welling, DA16 1RU

Scheme C

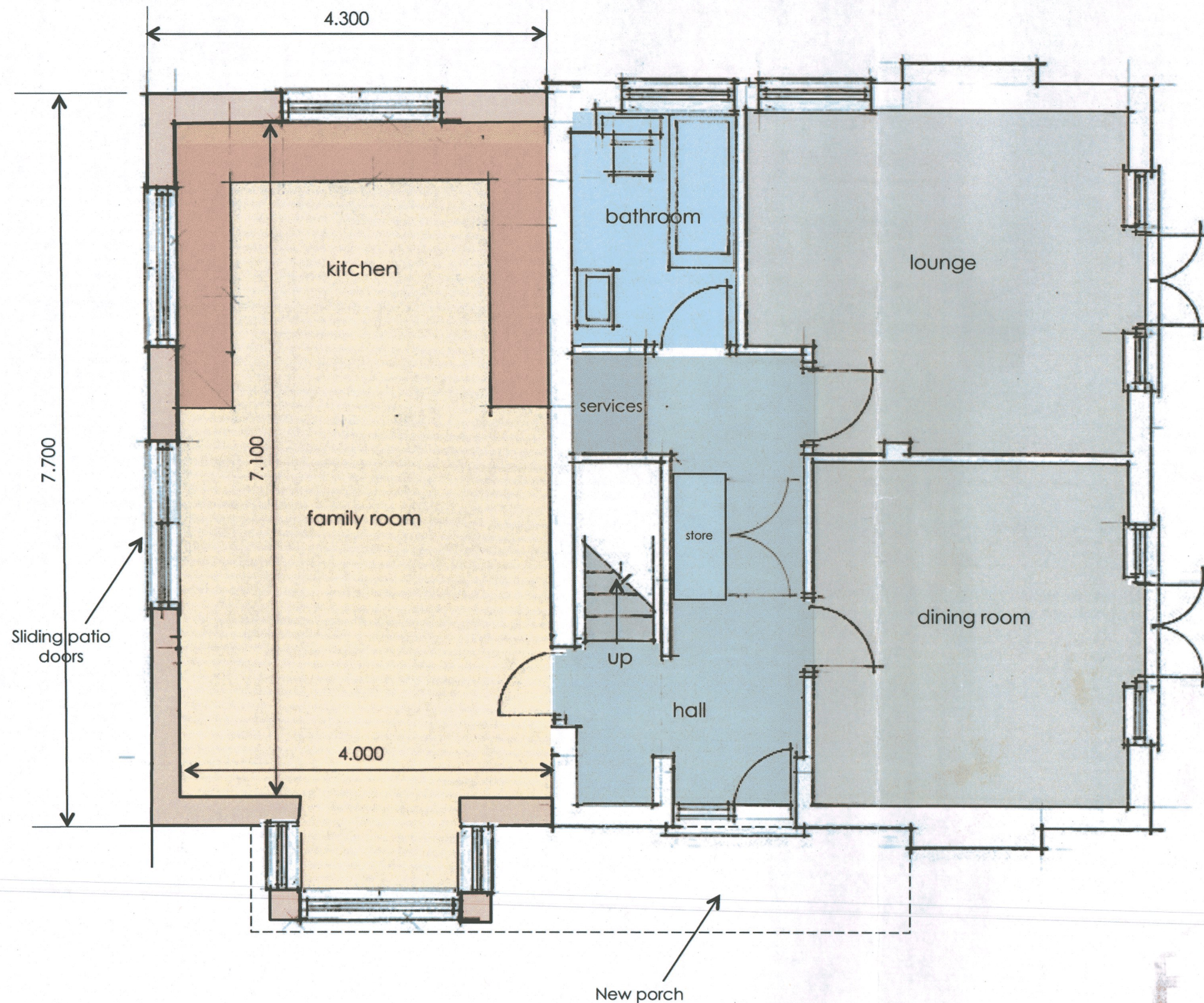
for R A Knight

scale 1 : 50 @ A3

February 2015

DEVELOPMENT AND PUBLIC PROTECTION	
16 JUL 2015	
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ground floor plan as proposed

**BEXLEY COUNCIL**

Reference No: *15/01590/R*

DEVELOPMENT PERMISSION in respect of this drawing was GRANTED SUBJECT TO CONDITIONS on the

*8/10/15*

by BEXLEY COUNCIL, the Local Planning authority, pursuant to the Town and Country Planning Acts, and the regulations made thereunder  
Head of Development Control

**15 / 0 1 5 9 0 FUL**

Proposed Extension to  
1 Danson Mead,  
Welling, DA16 1RU

Scheme C

for R A Knight

scale 1 : 50 @ A3

February 2015

DEVELOPMENT AND PUBLIC PROTECTION	
16 JUL 2015	
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**FILE COPY**

To: **Mr R. A Knight**  
**North Lodge**  
**1 Danson Mead**  
**Welling**  
**Kent**  
**DA16 1RU**

**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)**  
**(ENGLAND) ORDER 2015**

**GRANT OF PERMISSION TO DEVELOP  
LAND SUBJECT TO CONDITIONS**

Reference Code :  
**15/01590/FUL**

**TAKE NOTICE** that Bexley Council, the Local Planning Authority under the Town and Country Planning Acts, **HAS GRANTED PERMISSION** for the development of land situated at :

1 Danson Mead  
Welling  
Kent  
DA16 1RU

For Two storey side extension.

Referred to in the application for permission for development received on 13th August 2015.

**SUBJECT TO THE CONDITIONS** as attached.

**Date of Decision: 8th October 2015**

*Susan M. Clark*

**Head of Development Control**

### **CONDITIONS AND REASONS**

- 1 The development hereby permitted shall be begun within 3 years from the date of this permission.

**Reason:** To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004) .

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the approved plans and any approval granted subsequently pursuant to this permission.

**Reason:** To prevent any unacceptable deviation from the approved plans.

- 3 The materials and finishes of the external walls and roof of the proposal hereby permitted shall match in colour and texture those of the existing building.

**Reason:** In the interests of the amenities of the locality.

### **INFORMATIVES :-**

- 1 To assist applicants in a positive manner, the Local Planning Authority has produced policies and written guidance, all of which together with national and London wide policy, is available on the Council's website. The pre-application advice service was used by the applicant in this case. The LPA and the applicant have worked positively and proactively in a collaborative manner through both the pre-application and the application stages to deliver an acceptable development in accordance with the requirements of the NPPF. The LPA delivered the decision in a timely manner in accordance with the requirements of the NPPF.

## **APPENDIX 13**

**File name:** Bexley Danson Comittee Meeting.mp4

**Moderator questions in Bold**, Respondents in Regular text.

**KEY: Unable to decipher** = (inaudible + timecode), **Phonetic spelling** (ph) + timecode), **Missed word** = (mw + timecode), **Talking over each other** = (talking over each other + timecode).

**Chairman: Thank you very much. So, turning to the town planning applications for us this evening, the first item we're going to hear starts on page seventeen. It's in respect of 2, 4, 6 and 8, Danson Road, Bexleyheath, and that's in the hands of Miss Alera.**

Miss Alera: Thank you, Chairman. The application site is located to the north-west corner of Danson Road, close to the signalised junction with Park View Road. This aerial view here just indicates a site with a red line. Just for context, there are two pairs of semi-detached houses located close to the corner junction and with the pedestrian access to Danson Park. Just providing some context for members regarding the location of this site. These show the proposed four semi-detached properties proposed to be demolished as part of the application. The application is for, following the demolition of these properties, the redevelopment to provide a two to three-storey high nursing home to provide a total of 70 beds. This shows the proposed basement level, for context, the part of the site to the immediate south of this application, I don't know a cursor's being shown, will actually be completely subterranean, so won't be above the overall ground-floor levels. As set out from the officer report, the nursing home is for those with end of life care but also those with severe dementia, so you'll note that there is a central courtyard, which these units face onto, to provide a secure amenity space for future residents.

This shows the ground-floor, and to the south, you may be able to see in this plan here, the outline, actually, my cursor is working, of where that basement level is, effectively sitting below the ground-floor, and then you can see this lower basement-level courtyard in the centre here. This shows the first floor and then this is the upper floor, the third-storey element, largely contained in the roof to the south and then full three-storey in height to the northern corner but this rear projection is only two-story in height. For those who are interested, there's also an indication here for where the proposed air-source heat pumps will be located. For context, this is the proposed front elevation. Again, you can see the three-storey in height closest to the pedestrian access, with Danson Park, going down to two-storey height towards number ten. This is to the north elevation, largely what you'll see along walking in through the pedestrian route into Danson Park. This shows the rear elevation of that section, showing the different heights of the buildings, and again, this is just the other side elevation and you can briefly see this is the terraced area above part of the basement, just popping up here, where there is proposed seating at ground-floor level.

A few CGI images to give some context for the overall scale of the scheme, you can see, below, the proposed development, and above, the existing front elevation. Here in the corner, in the context of

Danson Park, on the pedestrian route through, looking back from that same pedestrian route, and further down the road you can just see it here, the two to three storeys in height within the context of the wider road. Just briefly, this is the proposed landscaping plan. It shows areas of parking to the frontage and then soft landscaping to the rear, boundary treatments around all side and rear boundaries and soft planting. This scheme has been subject to revisions and alterations during the consideration of the application, whereby, working with the Highway Authority, the developer has amended the proposed access arrangements to the site. It is now proposed that vehicles will access the site from the southern end, so, apologies, this picture's rather grainy but the 'in' sign there shows where the access will be, and then exit through the northern end of the site, and it is also proposed that it would be a left-hand turn only, so you are unable to turn right as you access the site. This is just a site plan here, shows that arrangement again and also shows the seventeen car-parking spaces proposed as part of the application.

A couple of brief updates for members. Further to considerations, the Highway Authority have requested a further criteria be added to condition four, that's the demolition and construction management and logistics plan. A further requirement for a construction, logistics and community safety compliance to assist the developers and their contractors, to ensure they undertake the works using best practice. Briefly as well, a couple of additional notes, further to the publication committee report, two additional letters from existing objectors have been received. It is not considered they raise further objections to those already summarised in the officer report. Photographs were provided to support their position. Chairman, subject to the recommended conditions and the Section 106 securing matters set out on the bottom of page 47, the application is recommended for approval. Thank you, Chairman.

**Chairman: Thank you, Miss Alera. We have a number of speakers to this application or recommendation this evening. The first is Miss Hubbard. Miss Hubbard, when you're ready, you have three minutes. (TC 00:10:00)**

Miss Hubbard: To believe that the Highways Authority do not have any issues with this development is concerning. Objections raised by residents and ward councillors centre around increased traffic and parking concerns, which look to have been totally ignored. This is already one of the busiest junctions in the borough and Danson Road appears as number three on the borough's roads with the highest road-user casualties list and it's one of only three north-south routes. There are frequent accidents and these are likely to increase. The proposed no right-hand turn measures cannot be enforced and are insufficient, and the mitigation suggestions are poorly thought out. There are at least four schools on the route and there are huge concerns over road safety. The junction is often blocked at busy times with sheer weight of traffic and this will be made worse by the increase in vehicle presence and movement onto and from the site. This is a major route used by all emergency services, and this development will further hinder their movement.

The suggested number of parking spaces is totally inadequate. This will have a massive impact on the surrounding roads and this has been ignored in all of the figures presented by the applicant. In excess of

21 staff will be working there on a daily basis and not all of them will arrive by public transport or live locally, as is cited in the documentation submitted. It is also a fact there is currently a massive shortage of nursing-home staff. This will be a complete over-development of the area. A covenant is in place on the proposed site that clearly states the council will not permit any trade or business to be run from properties that fall under it. This is not a residential development. It is a commercial business enterprise. Privacy will become an issue for neighbouring residents, as well as those residing in the care home. At least 24 bedroom windows will be created on the first and second floors, and to say that is not considered that it would be overbearing or introduce any unacceptable loss or privacy or overlooking is ridiculous. Care home residents, especially those with dementia, need to have their dignity protected for them. Having their bedroom windows overlooking the park and existing houses is leaving them open to having their privacy and possibly their dignity compromised, as is putting them in a basement with virtually no access to natural light.

Danson Park is a Grade II Listed park, the entrance to which is of historical importance, and this development would impose substantial harm on its setting. The applicant presents the development as another amenity for the residents of Danson Park, rather than what it really is, a commercial, private care home. Consultation around the development has been hindered by the pandemic and it is clear that public opinion is not of importance. Bexley's strategic housing market assessment, 2020, suggests that the vast majority of people want to remain in their own home with support where needed, and there is low demand for additional residential care homes in Bexley. A development of this type appears-, in summary, the care home will be built in totally the wrong place. It will have an adverse effect, not just on the direct neighbours but all borough residents passing through or visiting the area, not to mention a detrimental effect on one of the most historic parks in London. For the application to have got this far is astonishing, and now for it to have been passed in principle is even more so.

**Chairman: Thank you, Miss Hubbard. Mr Osborne, sir, you also have three minutes.**

Mr Osborne: Thank you. A lot of the points that have been mentioned to you, I totally agree with, and I put forward, as well, a few others. I feel that the duty of care by your officers at the moment hasn't been taking place properly, and therefore I question the due diligence of the council officers on recommending this for an approval, and therefore, I question their integrity on putting this forward for an approval. The site is totally and utterly overdeveloped. In order to get 70 bedrooms for older people in God's waiting room is just totally over-development of this site. To have four large houses on the site at the moment, which has approximately four/five bedrooms in each house, that would give you something like about 32 residential units-, habitable rooms. That's taking a residential occupation on the site, and then to demolish that and to put up a 70-bedroom nursing home is totally overdeveloped. With the staffing, as has already been stated, the staffing in there arriving on or expected to be arriving on London transport, again, with the amount of staff, 24 day staff, with 17 evening staff, crossing over at any one time with only seventeen parking spaces, come on. This is totally over-development. You haven't given sufficient consideration to the people in the, or proposed, in the nursing home, and to have seventeen parking spaces and 70 people in there, their spouses and that coming along to visit them have got what-, how are they going to, sort of, park up? Where are they going to go? It's going to cram up all around that surrounding area, over-

development is there.

You haven't even considered the amount of parking or the amount of traffic that goes up Danson Road. There are queues now at Danson Road, and to then take people in and out of that on a daily basis, for the four houses that are there, there's hardly any problem but to then put 70 beds in there and to have visitors, staff etc. coming along there, 70 beds, come on. It's over-development. The traffic congestion that that will cause on a roadway that goes through the centre of the borough, I don't think your officers have taken good consideration into giving this approval. It should be refused, and it should have been refused by your officers. Thank you for listening to me.

**Chairman: Thank you, Mr Osborne. Councillor Camsey. Councillor Camsey, you have five minutes, should you need it, when you're ready. (Silence 16.23-16.43).**

Councillor Camsey: Thank you for this opportunity to speak on behalf of residents against this development. It is clear from the number and range of objections received that this is a controversial application for many reasons, including concerns related to over-development and elderly people being placed in a basement. I will focus on the main issues troubling residents and ward councillors, the impact on traffic and parking in the area. The proposed development is on a major road, a through route to this, to and from the A2, so it is already extremely busy. Anyone who uses this route will know that there are always long queues at the traffic lights, both along Danson Road itself and the approach along Crook Log towards Welling. This is exacerbated at rush hour, when the queues can stretch back for long distances. Traffic at the lights either turn left towards Welling or right towards Bexleyheath, consequently, there are always two lanes waiting to move. Residents wanting to access their own driveways already experience difficulties, and they add to the congestion as they wait either for a gap in the traffic or for a driver on the main road to let them through. This will also apply to anyone wanting to access or leave the care home. Along Brampton Road into the main road, again, long queues develop, especially in the evening, when commuters join from side-roads from the station. Let's add into the equation emergency vehicles, blues and twos are frequently heard along this stretch of road and along Danson Road, and are already held up trying to manoeuvre their way through.

Then, of course, we need to factor in pressure on parking. Danson Park is a very popular open space. Parking inside the park is very limited, so those visiting it frequently park on the road or side-roads, especially Bean Road, which, with The Grove, is already a rat run as drivers attempt to avoid the congestion at the lights. Parking for the care home is also problematic. There will be 24 staff, visits from specialist support services, a doctor, ambulances, deliveries of supplies, and visitors to residents. It is clear that the proposed number of parking spaces will be insufficient, resulting in increased parking in Danson Road and side-roads. The developer has stated that, at another home they run, visits equate to one per room per day, so this could mean at least 70 a day for this development. Three months' grace for submitting a travel plan to encourage the staff to use public transport is allowed but has not yet been submitted. Once approval for the development has been given, what (TC 00:20:00) guarantees are there



that such a plan will be monitored and the conditions enforced? We no longer have a specialist borough team to undertake this role. Looking at the times that staff will be working, would they really want to be using public transport at night, always supposing that bus and train times fit in with their shift? Most will be women, and in the light of recent events nationally, there is already concern about women working on their own. Would they want to use a bus, walk from the bus-stop or ride on a bicycle in the dark in winter?

Another issue is that of vehicles attempting to turn right as they leave the home, and although the developers have suggested use of cameras and vehicle recognition, who will actually monitor and enforce the instruction not to turn right? I haven't time to refer in detail to other issues, including the noise, dust and delivery of materials that will be experienced during demolition and construction, but how will these deliveries be managed, so that there are not lorries waiting in Danson Road for access to the site, thereby adding further to the problem? Presumably, there will also be delivery vans taking supplies to the home. I would support all who have objected to this development, all the reasons put forward are valid, and I would urge the committee to consider the issues I've raised regarding traffic and parking very seriously and to reject this application. Thank you, Chairman.

**Chairman: Thank you, Councillor Camsey. Thank you. Mr Batchelor, you also have five minutes, sir.**

Mark Batchelor: Thank you, Chairman, good evening, members. My name's Mark Batchelor. I'm Planning Director at Boyer, the agents for the application. I'm pleased to be presenting this application to you this evening. I would start by placing on record my client's and my thanks for the council's approach to this application, holding it in abeyance for approaching twelve months last year, while my client's focus was naturally on operational matters and keeping their existing homes COVID-safe. By way of introduction to the applicant, Carebase is a family-owned and operated nursing home provider with homes across south-east England, including in Bexley. They are an industry-leading provider and have won a string of awards, including the COVID Hero Award at the Great British Care Awards earlier this year, and Care Employer of the Year, which they have won on numerous occasions. If permission is granted this evening, Carebase will promptly deliver and operate this home. The proposal involves the development of a 70-bedroom nursing home, providing exemplary care for residents with dementia and other complex, life-limiting care needs. Our evidence shows that a current requirement for 754 bed-spaces in the borough, which is due to rise sharply across the coming years, given the ageing population. Your officers and we have worked extremely closely in relation to this proposal, most recently and significantly in respect of highways matters surrounding egress and servicing. Your officers have presented a comprehensive report which sets out, in detail, the benefits arising from the development and explains that the proposal is policy-compliant.

I don't want to rehearse what's already been set out in the report, instead, I prefer to focus on specific matters associated with the proposal. In terms of highways impacts, the development makes adequate

provision for on-site car-parking and cycle-parking, and in making this proposal, we have considered not only the policy position but also the parking demands at Carebase's home in Erith, which has a much worse PTAL than this site. We've also engaged extensively with the highways and planning officers in respect of egress from the site, proposing a series of physical and soft management measures to ensure drivers turn left on exiting. Following this extensive dialogue with officers, we're delighted to have the Highway Authority's support. In terms of housing matters, the London plan makes clear that each bedroom in a nursing home counts as a dwelling, as such, this proposal will create an additional, excuse me, 66 homes in the borough, making an important contribution to housing land supply and delivery. Many of the home's future residents will currently live in the borough in family housing, and once they have been re-homed at the application site, those family houses will become available for young families in the borough in need of such accommodation.

There is an extensive range of benefits arising from the proposed development, most importantly, including that the home will provide safe and secure accommodation for future residents. Many of these residents will currently be living in inappropriate environments, most commonly, family houses not suited to their advanced care needs. Through re-homing those residents in appropriate accommodation, there will be a reduction in the need for in-home visits by district nurses and reduced pressure on GP surgeries, as well as reduced hospital stays following accidents which occur at home. The proposed home will also deliver significant local economic benefits, including the creation of approximately 60 new jobs for local residents and approximately £100,000 of additional local spend in the economy. In addition to these benefits, my clients are resolving historic issues at the site, transferring back to the council land that was taken by previous owners of 2, Danson Road, following the extension of that home in the 1980s. My client will re-landscape that land and will renew and expand the hedgerow to the rear of the site in Danson Park, alongside committing to paying for future maintenance in these areas.

I hope you will agree with your officers' and my positive assessment of this proposal. If you approve this application, you will not only be backing the delivery of a nursing home, for which there is considerable evidence of local need, but you will also be ensuring its operation by one of the leading providers in the industry, thereby delivering exemplary end of life care for the borough's residents. Thank you.

**Chairman: Thank you, Mr Batchelor. Members, you will have noted, as has already been pointed out, there is an addendum item to this application, so please do read that if you could. Councillor Clark, you had your hand up first.**

Councillor Clark: Thank you, Chairman. Well, what to say about this application? There's not one strand of the application that I feel comfortable with, and I have to say that I'm somewhat surprised by the reasons for the recommendation on page nineteen. Many of the reasons that I don't like this application are not planning reasons, such as knocking down perfectly serviceable homes or having a commercial enterprise abutting a jewel of Bexley's crown or putting elderly people into rooms below ground. I will concentrate on the aspects that are planning reasons. I think it's over-development. There is definitely a

lack of on-site parking. The size and massing isn't particularly good and the road safety aspects in this report are very woeful. Danson Road is a road of many different styles of housing but this building is a step too far, by its size and will only totally be out of place. The major issue here is traffic and a road safety one. Danson Road is one of the busiest major roads in our borough. It is very rare that there is not a tailback from the lights in Danson Road, and often the traffic jam created by cars turning into Danson Road from both Welling and the Bexleyheath area. I too have taken some photos of the safety records of this junction because I don't know how it happens but there are lots of accidents at the junctions, and nine times out of ten, it takes us a long time to repair it, and this is a pedestrian access across this busy road and you can see yourself, it's not a very safe junction. Indeed, there are often long tailbacks that block the junction from cars trying to turn right into Danson Park's main entrance some distance along the road.

There may be a suggestion that the banned right turn out of the proposed building would be enacted but this is not clear in the conditions and it is certainly not manageable. I live at the junction of a one-way street and many cars will go up the wrong way just to beat the traffic and they ignore the signs completely, just like they do at the back of these offices, where there is a no-entry and it certainly isn't policed. The right turn out of the proposed building is a minor issue. It is the right turn in that will cause the massive disruption and there is no advice in the papers on how this will be managed. There are also the issues of pedestrians to the park and the local primary schools to be taken into consideration, and you can see from these photos, that is where the children will be crossing, either into the park or to go to school. Lorries during the demolition and the building process will cause major disruption, and as I know from living very near to minor sites, lorry drivers will do what's best for them and not care about the law or the other motorist, and we have not got the manpower to police the situation, however prescriptive the methodology is.

This alone is enough for me not to support this application, but then seventeen car-parking spaces for an establishment of this size is not enough, even if we feel families will not want to visit their relatives but I realise there is a bus-top very close by but if you're a family of four, you will come in a car because four fares on a bus (TC 00:30:00) will be quite high. I'm also very mindful of the National Planning Policy Framework, para twenty-, 200, about the impact on the park. And once it has been harmed, it will be too late to put it right. And as to the surveys, in support it brings to mind that well-known phrase of the sixties by Mandy Rice-Davies, 'Well they would, wouldn't they?' We all know that you get the answers you require by the questions you ask. I'm not at all happy with this application and for road safety reasons, I feel I cannot support it.

**Chairman: Thank you, Councillor Clark. Before I invite Councillor Slaughter to speak next, can I ask, Miss Alera, could you give us some indication as to what mitigation measures we plan to put in place regarding turning right into this care home? If any?**

Miss Alera: Thank you, Chairman. Currently there is a right turn mitigation strategy proposed as part of the application. I'm going to crudely summarise the highlighted points if I may. They are proposing for

operational measures, camera monitoring system, so CCTV, to monitor the cars coming in-, coming out and how they turn. Visitor vehicle registration so they can basically see which cars belong to whom. Supplier access documents, which effectively means those that are delivering or collecting from the site will be given details about how to enter, safely park and to exit. Similarly, staff education, as well as travel plans are also proposed. As part of their website in the contact section, they'll explain the access arrangements to the site, utilising map and diagram highlighting the right-hand turn out of the property is prohibited as a manoeuvre. Also encouraging public transport links and visitors being encouraged to use public transport as well. And then also visitor and resident information with the move-in documents, with a clear accessibility section to set all these matters out. That forms part of their proposed strategy currently.

**Chairman: Thank you for that helpful information. Councillor Slaughter.**

Councillor Slaughter: Thank you Chairman. Most of us know Danson Road pretty well, because it's a main artery in the borough and it's a road presently entirely composed of detached and semi-detached houses, mostly substantial houses, which gives the road a particular character. Furthermore, of course, Bexley has had a vast increase in building of smaller homes and flats and I think there is a need for decent, large houses and to see four perfectly good houses of this sort demolished, I think is appalling. Most of the houses have substantial front gardens with garages and substantial drives and that adds, too, to the character of the road. The demolition of these houses at the beginning of the road, next to the entrance to Danson Park and the erection of an extremely bulky building, with car parking along the boundary with Danson Road, will completely change the character of the road and, really, the larger area. And the building will, too, be largely forward of the existing building line.

Looking at need, page 23 of the report says that the Strategic Housing Market Assessment says there is a need for affordable, specialist older people's accommodation, where people can live independently, but exceptionally low demand for additional care homes in the borough. NHS Bexley CCG want more extra care offer for older people in the borough, rather than residential and nursing homes.

Looking at-, policy CSO7 of the core strategy is mentioned at page 29, but I can't see it specifically discussed-, the contents of it says that the vision for Welling will be achieved by ensuring that heritage assets and areas that are characterised by mainly semi-detached housing and detached family housing are retained and where possible improved and that new development should be in keeping with the local and historic character of these areas. The proposed building is anything-, does anything but meet those requirements.

DP6 of the Emerging Local Plan says that development resulting in the net loss of all or part of a dwelling would generally be resisted except where the loss would allow for the provision of a community facility

and healthcare facilities, but I don't think that this sort of home is regarded as healthcare facilities.

Now, the entrance gates to the park are very formal and look very '20s and '30s. Indeed, a sign on the gate informs you that they were presented to Bexley UDC in 1929. The report at page 35 is rather dismissive, saying there's no reference to these gates in Historic England's listing, but these gates are nearly a hundred years old and they're part of the history of this part of Bexley and they will be overshadowed by the proposed new building.

I walked down the entrance into Danson Park recently at this north-east corner, between 2 Danson Road and Danson Mead and as you walk down towards the park, you have a wonderful view across to the trees in the park and if this development goes ahead, this will in future be lost to visitors to Danson Park.

The report is also equally dismissive about the effect of the development on 1 Danson Mead, saying the proposal will be two stories high along the boundary and it's not considered it would be overbearing or introduce any overlooking or loss of privacy. Now, while I accept that there is 24 metres between the boundary of the site and 1 Danson Mead, at the moment there are trees and shrubs opposite Danson Mead which will be lost. And there are the two story and three story buildings along that side of the site and there will inevitably be some loss sunlight for 1 Danson Mead.

Speakers and Councillor Clark have talked about car parking. Now, the number of car parking spaces seems to me ridiculously low in spite of what Highways and the applicant says. Seventy beds, friends and family visiting, they will expect to park within the site. Whatever people say about the PTAL rating and the availability of public transport. 24 staff, some may be allowed to park, certainly you can imagine people working there overnight will want to park, and there will be doctors, chiropodists, hair dressers and all sorts of other healthcare and other people visiting the site. You obviously can't park in Danson Road, there are seldom spaces in Danson Mead, so there will be more pressure on whatever few spaces remain in Park View Road. Now we constantly hear about travel plans, but whenever do we ever hear anybody monitoring travel plans? I think that's a tick-box exercise.

I won't go into any detail about the traffic problems at this point. We all know what the traffic is like approaching the junction with Crook Log and Park View Road. The traffic is already constantly queuing along there at all times of the day.

So, in summary, Danson Road should be retained for high-quality, substantial detached and semi-

detached family homes. The bulk and the height of the building are totally inappropriate for Danson Road, the development would have an adverse effect on the (TC 00:40:00) historic entrance to the park via its north-east corner. It would also have an adverse effect on 1 Danson Mead. The insufficient parking and the additional traffic entering and exiting the site at this point will cause additional pressure on this part of Danson Road near the traffic lights and, like Councillor Clark, I cannot possibly support this application.

**Chairman: Thank you, Councillor Slaughter, could you turn your mic off, please? Councillor Davey?**

Councillor Davey: Thank you, Chairman. Well, firstly can I say I agree with what the members have said so far. It's-, I entirely agree with everything they've said, so I'll be brief and just point out my four points of-, that I object to on this. First of all, traffic has been mentioned. I don't think you could pick a worse place as far as traffic's concerned to build something in the borough. They talked about managing the staff, making sure they don't inappropriately turn right into it. How are you going to manage that with visitors who have got-, are a law unto themselves and are not going to be told what to do? And as there is an inadequate number of parking spaces, you could get a group of visitors fighting for a space, blocking up the road, trying to get in there, so I'm not at all happy about the traffic. I think that's-, even just taking that on its own, that's sufficient reason for turning it down.

The other objection-, well, one of the next objections, rather I should say, is it's adjacent to the curtilage of a nationally listed building. So extra care has to be taken, I think, making sure that we don't put inappropriate developments alongside curtilage of nationally listed buildings.

The third objection, as has been said, it's an over-development and it's out of character with the other houses down that road. Right, and, as also been mentioned, the loss of large family houses. There's always a shortage of those. Some people have quite big families and need that size house for their families. There's no point in building lots of tiny little one-bedroom houses everywhere. We need some bigger houses to house large families, so.

Generally, if this was somewhere else, I'd be quite happy with it. It's just about the worst possible location you could actually put something like this. And whether or not we need these care-homes, I'm not sure, but I certainly-, we have an ageing population and if it was somewhere else, with decent road access, decent parking, not overlooking a listed-, the curtilage of a listed building, and being an over-development, I'd be quite happy with it. But it's just the wrong place. The wrong building in the wrong place. Thank you, Chairman.

**Chairman: Thank you, Councillor Davey. Councillor Bishop?**

Councillor Bishop: Thank you, Chairman. Chairman, my first point, really, is that I'm not happy with the comments from one of the objectors regarding the integrity of our officers. Our officers act with the utmost integrity, they always operate within policy and planning guidelines and they've done their very, very best with this development. And if you look at the development they've brought forward, by design this actually fits the location to which it's planned. And I say that because, if you look-, I say that because if you look across the road and you look at the street scene, across the road is Crook Log. That's not one or two stories high. So to say that really this is over-development and we're looking at this particular development where it's not really in keeping, if you look at it by design, it's not too bad a development.

So, may I, Chairman just carry on? Thank you. So-, (talking over each other 44.49) Yes. My issue, okay, which has already been, sort of, put forward, is one of traffic, parking and road safety. So, if we take that on board-, actually, what would be helpful, Chairman, if you put the plan view up? So you can-, it shows the layout of the plan and we've got the in and out on the site. Thank you. Go on. That one will do if you like, that's fine.

So, a couple of specific questions, really, for officers. I've been given some figures here which would indicate to me you anticipate roughly 1, 1.2 movements per dwelling. So we're looking at, would I be right in saying, 84 movements in and out of the site? Okay, so if that's an average, could you take me through that, is that an average over five days, seven days? Is it an average over 24 hours or would I possibly be looking at 50-60 movements between 9:00 and 5:00 and then, I don't know, twenty or so late in the evening? So what I'm looking at is, it's 80 on average, 84, but would there be peak times when you could say to me, 'Well, yes, average is 84, but you're going to get most of that traffic movement is going to be condensed in a certain period.' Because I want to get to an understanding for that.

Secondly, I'd like you to take me through a scenario. So I've come from the A2 and I've come into the site. The first thing for me, is if I swing into the site and try and park, the layout of the car park would not allow me to swing straight into one of those bays. So if I'm taking the first bay as you go in, that would probably need me to stop, kind of reverse back, reverse in, so there's a potential delay for a car that's behind me getting into the site. So that's-, there's two questions so far, really it's about the layout and the average visits.

And finally, I come out of the exit and I behave myself and I turn left-, I want to go back to the A2. So where's my route? I've either got to go left and all the way round the park and back, or I've got to go right and I think my first opportunity to try and get back to the A2 would be down Upton Road. Would that be right? Upton Road, if anybody knows that junction, which is just where the old (mw 47.30) used to be,

you try and turn right there, it's difficult enough. But if we're getting all of the traffic that comes out of here and going down to there, then we've got another bottleneck where people are trying to turn right to go down Upton Road, to get back to the A2. Alternatively, I could come out, perhaps sneakily go left and left and I would be going down Danson Mead to the bottom, turning right, coming back up and turning left at the lights.

So I'd like really-, for me, I suppose I'm distilling this back down, and like the rest of the councillors is the fact that it is an issue regarding access to and access from this site. And also, if you're trying to come down from-, sorry, Bexleyheath Broadway (ph 48.19), you turn left at the lights and want to turn right into this site. There are two lanes there, in effect. Alright, it's only dotted right at the very end, but most traffic will pull to the right. Traffic will be on the left, they'll be going down there to turn left to go towards Welling. You'll have cars trying to turn right across the line of traffic, across the traffic that's coming down on the inside and I can only see problems and issues on a safety aspect in traffic, of cars not having the visibility to turn into that site.

So, I'll leave it there, perhaps if you could then just kindly describe to me how I get back to the A2, what the density really is of the traffic movements and the layout of the car park, thank you.

**Chairman: Thank you, Councillor Bishop. Mr Threader?**

Mr Threader: Thank you, Chairman, and just to try and answer your questions, Councillor Bishop, the total daily flow is going to be up in the 80 vehicles per day, movements from the site. Looking at peak-hour traffic of about ten to twelve movements per day in the peak hours, morning peak, and eight in the evening peak. I can see that, obviously what we're looking at here is that a number of people will travel to the site by the public transport because there's an excellent link here along the Broadway, along Crook Log and the bus area and the PTAL is three to four through this area. In terms of Bexley (TC 00:50:00) itself, travel to work by car is about 40% of the people who travel to work by car, so you're looking at ten to twelve spaces would be used during those, sort of, peak periods and the other staff would normally travel by public transport or walk or cycle to the site. Cycle parking is proposed on the site, excuse me, and obviously a route of pedestrian links into the site are proposed as well. In terms of the safety aspect, we've been working with the developer for a number of months now, trying to improve the access points in this area and this is the arrangement that's come forward from the discussions with the developer.

This arrangement has been through an independent road safety audit, it was carried out earlier this year, where some Keep Clear markings were suggested within that audit to help people move in and out of the site. Those Keep Clears will be added to the detailed design when it comes through the detailed design stage, etc. That will help move us in and out of the site, in that respect. In terms of going back to the A2, if you come out left, yes, you did mention Upton Road and that's one of the routes you can use back down



to the A2. Or, there are smaller roads, I accept, Dallin Road and others there, which are difficult to use, but they are there to allow that right turn back down to The Grove and then back onto Danson Road, or other vehicles would go, as you say, down to the left and turn round and go back to the traffic signals.

It's not considered this would be a major movement, but those are the options we've got to reduce the effect of right turns out, is to push that left turn out of the site, to help the road safety of that junction. In terms of the layouts of the bays, looking at that, on this diagram, you can see a turning movement of a vehicle in that location. Well, it's been tracked in the bottom left hand corner there, where the movements into that bay are there in place. In terms of the traffic movement into the site, it's considered the PM peak and the AM peak, there won't be that significant number of movements into the site, therefore the conflicts with manoeuvring movements around the car park are not considered significant at this stage. Sorry councillor, was there anything else that I missed there?

**Chairman: Does that answer your questions, Councillor Bishop?**

Councillor Bishop: It does, Chairman. I think the point of the fact that there could be manoeuvres right at the very entrance into the development where that would then block another car coming in, I think it's clear on there. The only thing I'm not clear on is, actually, the number of movements that are suggested. I'm still not-, sorry if it's me not quite grasping it, you know, just in layman's terms, how many cars do we think are going to be turning in and out of there? As I say, I thought it was going to be 84 on average, per day, but it seems to me, the indication there was only going to be ten or fifteen movements a day. I just need to understand how many car movements in and out of that do we anticipate in a 24 hour period, then?

Mr Threader: Through you, Chairman. Sorry. Sorry I wasn't clear, Councillor. It's 84 movements per day, ten to twelve movements during the peak hour periods.

Councillor Bishop: Thank you.

Mr Threader: Thank you.

**Chairman: Thank you Mr Threader, Councillor Bishop. Can I, before I bring Councillor Slaughter back in, just take a moment to pick up on a point that Councillor Davey raised, in actual fact, which I do disagree with, I have to admit, when he indicated that he felt that traffic alone was an issue for turning this application down, or this recommendation down. I don't particularly agree with that. I must admit, I had reservations when I first looked at this but, when I look at it again and I look at the fact that we're talking about four substantial properties here, number 2, 4, 6 and 8 Danson Road, none of those have restrictions on how they exit or enter the property. It seems to me**

**that with the measures that we've got in place, particularly with that of turning left out of the property, the restrictions on this proposal before us tonight are more severe, and quite rightly so, than any restrictions or no restrictions on the movement of traffic out of those four large properties. I wouldn't particularly agree with Councillor Davey's opinion, that traffic alone is sufficient reason. It is an issue, I'm not saying it's not an issue, but it's not sufficient for me, in planning terms, to refuse this application, in my personal view. Councillor Slaughter?**

Councillor Slaughter: Thank you, Chairman. I must say, before I raise the point that I was going to, that 84 traffic movements a day from this development would be vastly different than the number of traffic movements from those four houses. However, what I wanted to ask the planning officer, the house officer, if I may, was he referred to a traffic count or investigations earlier this year. Were they carried out prior to the lifting of the pandemic restrictions?

Mr Threader: Through you, Chairman, sorry, Councillor, I wasn't clear. The road safety audit was carried out earlier this year, correct. Obviously, a lot of the work they do is from the plans that are produced, but they do carry out road inspections as well, as part of that road safety audit. They would take into account queuing on the approaches to the signals and be aware of that as part of that audit. Again, another road safety audit is carried out, so a stage two audit is carried out at the detailed design stage where, again, the review is carried out of the site in all road conditions, including the daytime and the night-time as well.

**Chairman: Thank you, Mr Threader. You okay with that, Councillor Slaughter?**

Councillor Slaughter: No, not really. I really wanted to know what time of the year these audits were carried out, to know whether the amount of traffic was at its normal volume or whether, as we know happened during very much of various periods of the lockdown, the traffic was much reduced?

Mr Threader: Sorry, Councillor. In terms of the traffic surveys, the data is taken from before the pandemic came through, if that helps. That assessment was done, also, in terms of the TRICS data, the standard data that estimates the number of movements into a site, again, is from a database that goes over a number of years. It's not recent data, it goes over five years or more. Thank you.

**Chairman: Thank you, Mr Threader. Before I bring Councillor Clark in again, I would ask, Miss Alera, are there, to your knowledge, any further mitigation measures that you may, perhaps, have up your sleeve, which you are thinking or possibly bringing in, to mitigate access to this site?**

Miss Alera: Thank you, Chairman. Off the top of my head, listening to members' concerns about, not only accessing egress but also, how you monitor such (inaudible 58.31), the one thing I could recommend is, potentially, members, would we mind if we have a Section 106 ready? That's a legal agreement. Instead of conditions, we can look at creating a legal agreement where the care home provider is required to do

certain works, the reason being that there are further teeth, as it were, in a legally binding document. Off the top of my head, I would recommend we do two things, it would be, applying for the requirements we talked about, in terms of that strategy I summarised to you earlier, being moved into that, and also looking at potentially, if members wanted to, you could do that, not just for the barring of right turn out, but potentially barring a right turn in or discouraging it. You could also use that CCTV to allow for the monitoring, potential for securing a monitoring fee as part of that, to allow for officers to monitor the Section 106 and require them, legally, to submit details after a period of time of operation. I would recommend you'd have to have the units in operation and at a certain level of capacity before you could truly monitor the outputs.

With potential penalties, for instance, you could look, not just at the staff travel plan and how many people are using public transport, but also critically looking at those who'd come to and from work in cars and seeing which ones are actually adhering to the mitigation strategy, in terms of turning in and out. If they're not, maybe looking at potential penalties, such as removing their ability to have a parking permit to park on site and also seeing how those sort of things work. So, we could beef it up into an obligation and look at potential measures in which we can look at real penalties if the care home provider didn't adhere to the strategy that they are proposing.

**Chairman: So, what we're saying is, sorry, just to be quite clear on this, this is something that we would process under the Section 106 agreement, it's not something that we would condition or include in conditions.**

Miss Alera: You can do it through a condition. However, for instance, on major sites, travel plans are secured through planning obligations. Examples such as Southmere redevelopment, Erith Quarry, you could apply it here, given the concerns and the issues and the ability, a Section 106 gives greater weight, in terms of their legal requirement to abide by something above and beyond that of a planning condition. Planning conditions work, but if there are severe concerns, Section 106 gives greater weight and greater teeth to it.

**Chairman: So, how do we actually, if you like, get this into the Section 106 agreement? How is this going to be affected?**

Mr Lancaster: It'd be proposed and seconded and voted on in the normal way that you would add the move or vary a condition, you could similarly add the move or vary an obligation. There's no difference in terms of that process.

**Chairman: Councillor Clark?**

Councillor Clark: Thank you, Chairman and thank Mr Threader for his information a bit earlier. From his rough calculations, that means, out of the parking spaces they'll have on site, there will be five left for visitors after the staff have taken up their places, even if there isn't any extra doctors, hairdressers or chiropodists or anybody. If people are coming out and having to turn left, it would be, nine times out of ten, probably easier for them to remain in the left-hand lane, because they'd have to go across a line of traffic to get into the right-hand lane, so they'd more than likely turn left towards Welling. If they were to be able to turn right, they could take the first right and go back to Danson Road and then onto the A2, whichever direction they wanted to. If they went up to Upton Road, they could only get onto the A2 going towards Dartford, so that might not be a good idea. As for your comment about how, obviously, the people living in these houses already manage, I had a friend that lived in Danson Road, the other end, near the roundabout. She never ever turned right into her house, or turned right when she came out, she had the benefit of going up to the roundabout and using that, but she said it was impossible to do a right turn in or a right turn out from the other end.

So, I think that's probably, people living there know what the problems are and they manage their routes to accommodate those things. Like Councillor Davey, I do believe road safety is important enough to warrant only that on the reasons for refusal because, in all my adult life, I have worked in road safety and it's far more important than most people give it credit for.

**Chairman: Thank you, Councillor Clark. You've had two goes at this, Councillor Slaughter, is there still something further you wish to add?**

Councillor Slaughter: I'm awfully sorry, Chairman, but there is something that has occurred. Will there be barriers going across the entrance and the exit? So, will people have to wait for the barrier to go up to go in?

**Chairman: Not as far as I'm aware, but we'll put that over to Mr Threader. Any other member wish to add anything to this very good debate we've had this evening? Members, the recommendation is set out on page 47 and, as you well know, it is a recommendation for an approval. We've heard from Miss Alera with regards to our ability to make an amendment, as for an additional obligation to the legal agreement, as she has just recently outlined. With that in mind, obviously, we've got to vote on the recommendation before us, as it stands. With that in mind, I will ask for a proposer and a seconder, please? (silence 01.04.57-01.05.06) All those members in favour of approval? To the contrary?**

Male speaker: That's three for, four against, not carried.

**Chairman: So, that recommendation has not been carried. I'm now going to ask Mr Lancaster if he will sum up before I ask for a proposer and seconder for refusal?**

Mr Lancaster: Thank you, Chairman. There's quite some summing up, because I think I've got down here, potentially, nine issues of concern that are raised. We'll have to think carefully and someone will need to propose whether they want to stick with one, some or all of those nine reasons. What I've noted of concerns raised by various members is, and I'll be brief, because there's nine, over-development, bulk and impact on the character and appearance, impact on highway safety. I got that most particularly on the issue of the right turn but, of course, we have that additional obligation referred to, so I don't know whether that still stands for debate by members. Then, insufficient parking which, presumably, the harm you would be alleging, at that point, would be overspill parking, which is detrimental to the amenity of neighbouring residents. There was some discussion about whether the care home was needed or not and, probably, a linked element to that was a loss of family housing. We had the impact on designated heritage assets and, in particular, there was reference to the front entrance and, finally, I had an impact on the amenity of 1 Danson Mead. I believe I've got 'loss of sunlight'. So, nine issues, some of them were only raised by one member, briefly, so we'll need to go through them. Of course, you'll be mindful that the developer may well exercise their right of appeals.

Appeals can be a protracted and expensive process, so whilst, of course, if there's justified reasons to refuse it, of course we should, hopefully that will concentrate minds, if you want to pursue a reason for refusal. I don't think I can sum up further, I think it requires further debate my members, to be clear on what that alternative motion would be?

**Chairman: Thank you, Mr Lancaster. So, I'm going to ask which members would like to oppose refusal? Councillor Bishop, if you mind?**

Councillor Bishop: I just wanted to mention, before we get into that, I just want to say to members that the issues regarding the bulk, mass and sunlight, if it were me that were putting that together, I wouldn't put those forward because I don't think it would stand a test regarding its bulk and mass, because it's not over-development.

**Chairman: Councillor Bishop, I think we've had this debate and I think all that we need at this point in time is, I need a proposer. That proposer will need to put, clearly, as has been explained by Mr Lancaster, their valid planning reasons for refusal. So, who is going to be proposing here? Councillor Slaughter, you have your hand up? I will need a seconder as well, Councillor Davey? So, Councillor Slaughter?**

Councillor Slaughter: Sorry, Chairman. I mean, the notes that I'd made in summary, at the end of what I had to say, referred to the retention of the type of housing in Danson Road. I do think that bulk is appropriate because the bulk of the whole building, in contrast with the family housing which exists, is a stark contrast. I do think that the effect on the historic entrance to the park is relevant. I do think that the insufficient parking is extremely relevant, as are the road safety issues, the access and egress from the site

and the site and the effect on the traffic at the junction of Danson Road with Parkview Road and Crook Log. No, I haven't made a note, as we went, of the other (TC 01:10:00) points that Mr Lancaster had picked up.

**Chairman: Bear with us, Councillor Slaughter, if you could turn your mic off, just for a sec.**

Mr Lancaster: Councillor Slaughter, just to remind you, from my notes, there was a reference to over-development, questioned the need for a care home, so a number of the bedrooms were in the basement and the quality of the offer to prospective occupiers. Finally, the impact on 1 Danson Mead, I think there's a reference to loss of sunlight.

**Chairman: Can I ask a question, if I may? The need for a care home, is that a planning consideration?**

Mr Lancaster: What I would say, members, we don't often question the need, do we? When someone applies for a nail bar or a hairdressers, we don't often say, 'Well, prove it,' that a hairdressers is needed. So, it is unusual to consider the need for a particular offer. In certain circumstances, need can be a relevant planning consideration. Typically, it is something that is, in a way, left to the market to decide. You wouldn't assume a care home would build an expensive care home for it to be left empty and, whilst everyone may have their view on whether care homes are needed or not, I would suggest you'll need pretty compelling evidence to indicate that a care home is not needed, otherwise we might find ourselves in rather sticky and costly grounds at appeal.

**Chairman: Sorry to interrupt, Councillor Slaughter.**

Councillor Slaughter: Although I mentioned the question of need, I did say, on the basis that there were references in the report, to need of care homes of this sort, but I'm not sure I would want to put that in as a reason for refusing it. I do think there will be an adverse effect on 1 Danson Mead, of the light and the bulk of the building along the side of the development, alongside the path into Danson Park, I think that it would have an adverse effect on Danson Mead and, also, the effect on the entrance to the park.

**Chairman: Thank you, Councillor Slaughter.**

Mr Lancaster: Sorry, can I summarise once more, Councillor Slaughter, just to be clear? I think we've got six reasons, character and appearance, bulk, the highway, the road safety issues, the impact of the overspill parking issue, the impact on heritage assets, the loss of family housing and the impact on 1 Danson Mead. So, we have those six reasons and you no longer want to pursue need or the quality of the accommodation, vis a vis, the basement rooms for the care home. Is that correct?

Councillor Slaughter: I personally didn't mention Danson Mead (talking over each other 01.13.21).

Mr Lancaster: So, you're not proposing that one?

Councillor Slaughter: Just adding to the bulk and the height of the building.

Mr Lancaster: Sorry, yes, bulk and height and consequent impact on character and appearance? Yes, I've got that.

**Chairman: Okay, it's just that we need to be quite clear on the grounds because, obviously, for any potential appeal purposes. Councillor Davey, you seconded. Councillor Lang, you said you wanted to-,**

Councillor Lang: Yes, thank you, Chair. It's just a thought that came to me, playing Devil's advocate. What could happen if, you're talking about, some people are saying about not enough need for that size care home, so if we go down the line, it gets approved, you go down the line a bit further and it turns out it's not going to be a viable prospect-,

**Chairman: But we're not in that situation, are we? Because the recommendation has been refused.**

Councillor Lang: Okay.

**Chairman: We're now considering, obviously, grounds for refusal, which Councillor Slaughter has laid out, seconded by Councillor Davy, and I think that's where we stand at this point in time. Mr Lancaster has made a note of those grounds, those valid planning grounds, so I now have to ask, all those members in favour of refusal? All those against? So, we have refusal. Thank you. (silence 01.14.59-01.15.12)**