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CHARTERED TOWN PLANNERS

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Our ref: LA/8953

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Dear Sirs,

Planning application: Demolition of existing dwelling at 26 Hillbrow Road, Bromley, BR1 4JL

On behalf of our client, Stellar Hillbrow Ltd, we are pleased to submit a planning application for a residential development of six flats, following the demolition of the existing dwelling on the site. This letter sets out the planning justification for the proposal.

The application is submitted with:

A Design and Access Statement

A Transport Statement

A Rights to Light Report

A set of plans

The site is approximately 677sq.m and is located on Hillbrow Road, which is an un-adopted road in the London Borough of Lewisham sloping steeply down from north to south. Hillbrow Road serves a number a different properties including flats and dwellings. The surrounding area is residential with Hillbrow Road consisting of a mix of detached, semi-detached, and terraced properties.

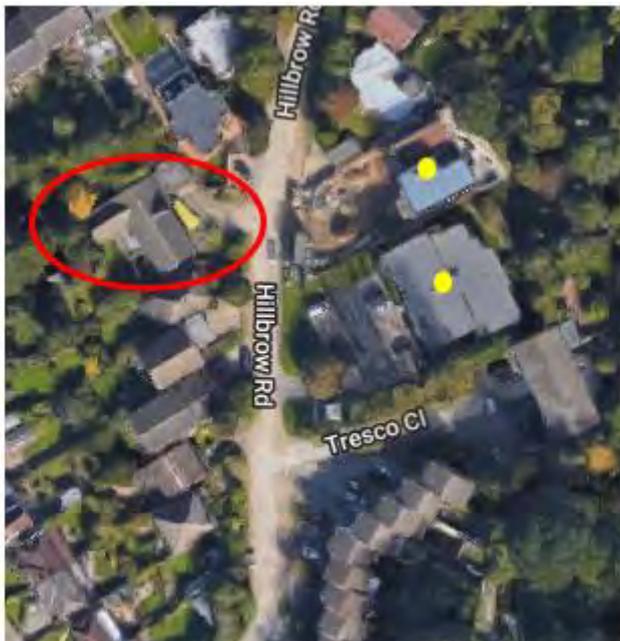
The site is currently occupied by a 3-bed dwelling which is set back in the plot with parking and a rear garden. The level change of the plot means a large proportion of the dwelling is concealed from the



road. The existing property is of no architectural significance and the surrounding area has a very mixed character. The existing property is a bungalow at the bottom of a steep driveway and has been unoccupied since October 2017.

The existing property is at odds with the surrounding properties which are predominantly two or three storeys. Its ridge line is significantly lower than the neighbouring properties however there is no prevailing style or size of dwelling in the area.

Hillbrow Road marks the boundary of the London Borough of Lewisham's boundary, with the London Borough of Bromley on the other side of the road. Recently Hillbrow Road has experienced some changes, with permissions granted for flatted developments opposite the site. The most recent and relevant applications relate to Upfield, which is nearly directly opposite the site, and Sunset Hill, which is adjacent to the development at Upfield. These developments (granted under consents 16/04910/FUL1 and 15/02144/FULL1) are within the Borough of Bromley. However, despite not being within the same local authority, the developments have a very close physical relationship with the site. The image below taken from Google Maps shows the site and the surrounding area, the buildings marked with a yellow dot are the recent flatted developments referenced above. We also show some photographs below of the flatted development.



(Image 1: Google Maps, 2018)



Sunset Hill



Matilda House (previously Upfield)



There is no available planning history relating to the site.

The site is not located within a conservation area, there are no Article 4 Directions and there are no listed buildings upon the site or within the immediate vicinity. The site is in a sustainable location, with good access to rail and bus services and within easy walking distance of facilities and services. Further detailed information about the accessibility of the site is set out within the Transport Statement prepared by consultants Systra and submitted with this application.

THE PROPOSAL

The application proposal consists of the demolition of the existing 3-bedroom property and the construction of a 1-2 storey series of 4 blocks within gardens, comprising 6 dual aspect residential units.

The proposal will be made up of 4x one-bed, 1x two bed and 1x three bed unit as follows:

Unit 1 1 bed, 2 persons (55sqm)

Unit 2 1 bed 2 persons (53sqm)

Unit 3 3 bed 4 persons (79sqm)

Unit 4 1 bed 2 persons (53sqm)

Unit 5 2 bed 3 persons (75sqm)

Unit 6 1 bed 2 persons (55sqm)



The proposal will deliver two car parking spaces and twelve cycle spaces, and there are areas of plant and bin storage as shown on the plans.

PRE-APPLICATION ADVICE

In accordance with advice in the NPPF 2019 (paragraph 39) we sought pre-application advice from Lewisham Council in order to discuss the proposals with the planning department. This was a helpful process which has fully informed the application scheme.

The approach to the proposal and how this has evolved due to the pre-application discussions that have taken place with Lewisham Council is explained in full within the Design and Access Statement.

(incorporating sustainability statement) prepared by Nick Willson Architects. The proposal has sought to make the best use of the site given the irregular shape and sloping plot.

The first pre-application was submitted to Lewisham Council in October 2018, with the proposal including the demolition of the existing unoccupied dwelling house and the construction of a part 1/2/3-storey residential building to accommodate 7 self-contained flats, comprising 3 x one bedroom, 2x two bedrooms and 1x three bedroom, plus 1x one bedroom self-contained maisonette.

A meeting to discuss this pre-application (PRE/18/109265) was then held with the planner and design officer during December 2018, with positive and constructive feedback being received. Whilst the principle of the redevelopment of the site was welcomed and acceptable in policy terms, the officers advised that the scale and the height of the pre-application scheme should be reduced to relate better to the surrounding context.

The scheme was then revised and submitted to the Council in January 2019, with a further meeting held during February 2019 (PRE/19/110772). This was still a 7-unit scheme, but with overall reductions in the mass and volume of the scheme. Following some further advice from the Council some additional revisions were made to the proposal which have resulted in the current 6-unit application scheme.

Given that the scheme has been prepared in accordance with the detailed and helpful feedback provided by the Council officers, we consider that we have a fully acceptable scheme that can be approved without delay.



DEVELOPMENT PLAN

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. The development plan in the borough is the:

- London Plan 2016
- Lewisham Core Strategy 2011
- Site Allocations Local Plan 2013
- Lewisham Town Centre Local Plan 2014
- Development Management Local Plan 2014

The National Planning Policy Framework (NPPF) (2019) is a material consideration.

DM Policy 1 from the Development Management Local Plan sets out the presumption in favour of sustainable development. It identifies that planning applications that accord with the policies in the Lewisham Local Plan will be approved without delay, unless material considerations indicate otherwise.

Spatial Policy 1 from the Core Strategy identifies that provision will be made for an additional 18,165 net new dwellings between 2011 and 2026. However, we note that the Government's new method for calculating housing need shows a rapidly increasing need for Lewisham, to over 3,000 dwellings per annum. The emerging London Plan (Table 4.1) sets out a ten year target for Lewisham between 2019/20 and 2028/29 of 21,170 or 2,117 per annum, so it is important for the Council to maximise the opportunities for the provision of housing in sustainable locations such as Hillbrow Road.

Core Strategy Policy 1 sets out the housing provision, mix and affordability across the Borough. It is a comprehensive policy on provision, mix and affordability. The key points are:

- Ensuring no net loss of housing and housing built to appropriate local densities in accordance with the London Plan;
- Seeking 50% affordable housing on sites capable of providing 10 or more dwellings (subject to financial viability);
- Provision of mixed tenure developments;



- Provision of family housing (3+ bedrooms), Lifetime Homes and wheelchair accessible housing; and
- Ensuring a mix in dwelling types and sizes.

The proposed development will not result in a net loss of housing, it will result in a net gain. Given the proposal is for 6 units, which results in a net gain of 5, it does not have to provide affordable housing. The 6 units are a mix of 1, 2, and 3 bed apartments.

London Plan Policy 3.5 identifies the minimum space standards for new dwellings. The proposed development provides development in accordance with the minimum standards in Table 3.3 of the London Plan. DM Policy 32 repeats this information and also sets out that dwellings should be dual aspect where possible. All of the dwellings in the application proposal are dual aspect.

Core Strategy Policy 8 identifies that the Council will require development to meet the highest feasible environmental standards during design, construction and occupation. The proposed development would be delivered to a high environmental standard as set out within the sustainability section of the Design and Access Statement.

Policy 14 from the Core Strategy identifies that car parking standards contained within the London Plan will be used as a basis for assessment. The proposal is delivering 2 car parking spaces and 12 cycle parking spaces and is located in a sustainable location. The site is within 850m from Ravensbourne Station (a ten minute walk) and the nearest bus stop is approximately 350m away on the A21 Bromley Hill Road. Additionally

Core Strategy Policy 15 requires a high quality design for all development in Lewisham. It sets out measures such as applying national and regional policy and guidance, ensuring design acts to reduce crime, applying housing densities as outlined in the London Plan, using Building for Life standards, and conserving and enhancing the borough's heritage assets. The Design and Access Statement submitted with the application provides detailed information about the design to the scheme.

DM Policy 2 prevents the loss of existing housing. The policy sets out the circumstances where the loss of housing will be permitted by the Council. This application will result in the net gain of housing, with a mix of units provided, it will therefore not result in a 'loss of housing'.



DM Policy 3 is concerned with the conversion of a single family houses to two or more dwellings. The proposed development does not relate to a 'conversion', given the existing building is due to be demolished this policy is therefore not relevant.

DM Policy 22 ensures that developments maximise the design to incorporate measures to maximise energy efficiency. The proposed development has paid will have regard to this policy.

DM Policy 24 sets out that living roofs should be maximised. The Design and Access Statement explains that a roof garden will be planted on the top of each block to allow plants, flowers and shrubs to grow to help biodiversity.

Policy DM 30 requires that all developments attain a high standard of design. It sets out the detailed design requirements, for example having regard to height, scale and mass, the proposed materials, and establishing how the proposal relates to the existing street. Through this pre-application we have set out some of the options available and considered how the proposal would relate to the surrounding area. The Design and Access Statement submitted goes through the design process and shows how the design has come to be. The proposal respects the form of the land and the surrounding character along Hillbrow Road. Through this pre-application enquiry we are open to discussion about the design of the proposal.

NPPF

The revised NPPF continues to support the Government's objective of 'significantly boosting' the supply of homes (para 59), with decision takers urged (para 11) to approve development proposals that accord with an up-to-date development plan without delay.

The NPPF sets out the objectives of sustainable development, which includes an economic objective, a social objective, and an environmental objective. The proposed development would deliver a scheme which would better utilise the site providing a higher density of development in this residential built up area. The site already contains residential development, the proposal seeks to enhance this through a well thought out flatted development.

The NPPF reinforces that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 127 sets out that development has to be 'visually attractive as a result of good architecture, layout and appropriate and effective landscaping'. The approach set out to the design of the scheme (as set out within the Design and Access Statement).



CONCLUSIONS

The proposed development seeks to maximise the potential for residential development at 26 Hillbrow Road. The proposed development will improve the street scene on Hillbrow Road, with the exiting building being of no architectural value and adding little to the street scene. Hillbrow Road contained a mixture of dwellings types and sizes and is not defined by one single type of dwelling. The proposed scheme carefully considers the particular constraints and opportunities on site and considers the surrounding area and has been formulated following helpful and constructive advice given through the pre-application process.

The proposal would provide a welcome boost to the Council's housing supply in a highly sustainable location.

Yours faithfully,

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