

# Non-Immediate Article 4 Direction made 23 October 2024 to control the change of use from Class E to residential in town centres

## Appendix A: Town Centre Assessments

The individual town centre assessments illustrate the existing character of the borough's town centres and highlight their vulnerabilities. In particular, the assessments draw attention to the considerable number of smaller commercial units that occupy the centres and how many of these exhibit residential character.

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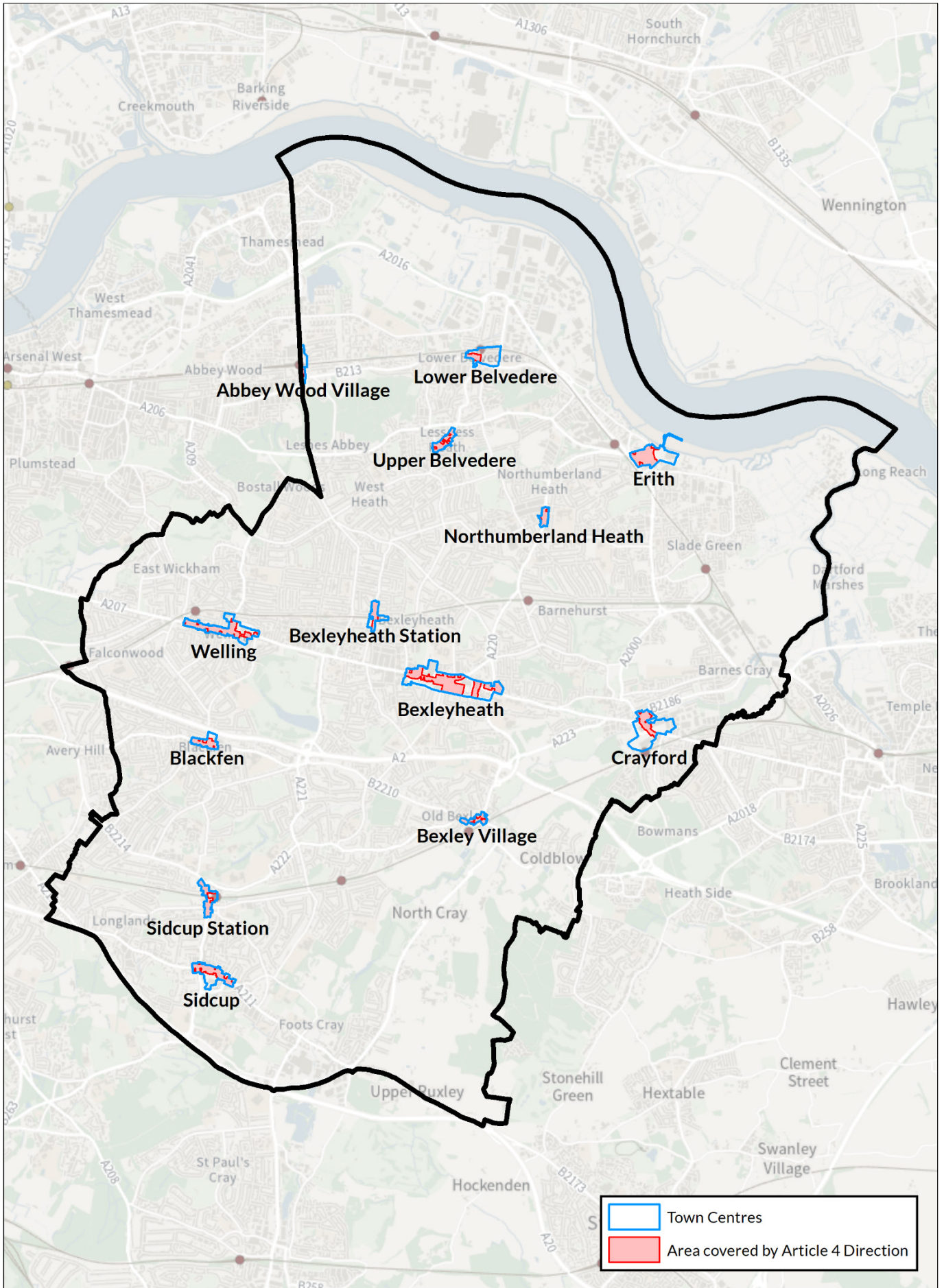


Figure 1: Borough-wide map illustrating the 13 designated town centres

# Bexleyheath town centre assessment

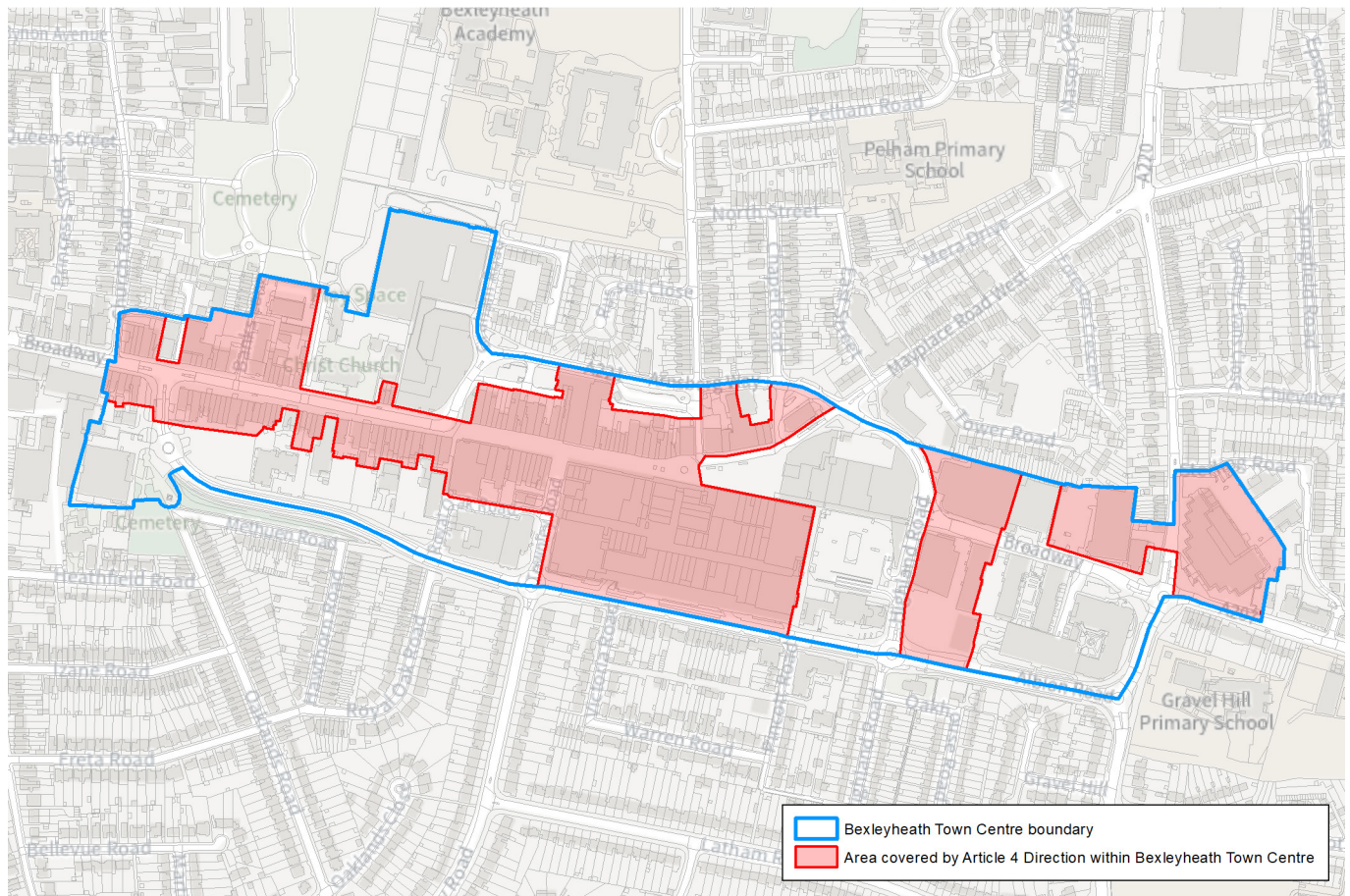


Figure 2: map of Bexleyheath town centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Bexleyheath is the borough's main town centre, geographically located at the heart of the borough. Bexleyheath is identified as a major centre within the London Plan, with the location being ranked at 156 within the 2017 Javelin VENUESCORE report (meaning that Bexleyheath placed the highest of all the ranked centres within the borough).

Bexleyheath town centre is linear in shape, extending east to west along the historic Roman Road of Watling Street. The town centre is accessed from the east and west by London Road (the A207). It is partially pedestrianised at Broadway/Market Place enabled by a ring road made up of the Arnsberg Way northern distributor and the Albion Road southern by-pass.

The town centre benefits from the highest PTAL (Public Transport Access Level) of any of the borough's centres (6a), and in fact the highest PTAL of any location within the borough. The main bus hub is located at Market Place and Geddes Place within the town centre. Buses arrive/depart Bexleyheath to other locations throughout the borough and beyond, heading east to Dartford and west to the Royal Borough of Greenwich. Bexleyheath is reached with ease from the A2 that is located a five minute drive away to the south.

Buildings within the town centre are mixed in height, massing and character, but the majority are constructed of brick, with red facing brick being the most prevalent choice. Other buildings feature render and cladding, with the larger commercial units exhibiting large, glazed areas. Particularly in the west of the town centre (along Broadway) there are a number of 1930s parade buildings, including that of 'Grand Parade.' These parade buildings extend across multiple shop frontages. Towards the east of the town

centre, to the north of Broadway, are more individual buildings of unique character. Whilst attached to one another, they do not necessarily form original parades, and vary in height from one to three storeys. Multiple window openings on the upper floors create a symmetry within the street scene, with residential use being common above the ground floor commercial units.

The retail stores of Asda, Sainsbury's, TK Maxx, Sports Direct and B&M are housed in buildings that are much larger than the 30s buildings that make up much of this town centre. These buildings, mainly brick built, are accessed via large shopfront openings and do not feature smaller window openings.

Uses within the town centre are predominantly commercial, business and service (Class E) with low vacancy rates. The variety of types and sizes of units contribute positively to the vitality, viability and vibrancy of the town centre, offering a variety of accommodation to suit different business scales and types, with the ability of these businesses to develop and grow whilst remaining in the same area. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The town centre functions effectively as a retail destination, offering a broad range of services, facilities, employment, and experiences. Given the pedestrianisation of the main area, there is a thriving café culture with a number of coffee shops, cafés, and restaurants.

The Bexleyheath town centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The town centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of the buildings within the town centre, it is considered that there are many examples of units which would be vulnerable to conversion under Class MA. Many buildings exhibit elements of residential character, with brick construction and door and window openings appearing with regular spacing across floor levels. There are also distinctive or individual features amongst the buildings and parades which would make them attractive prospects for conversion under Class MA.

For similar reasons most of these buildings lend themselves to smaller scale commercial operations, start-ups, or service businesses necessary to the viability and vitality of the town centre. Loss of units and available floor space will hinder the opportunities of businesses to function within a very sustainable, and accessible town centre. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

The change to Class MA that removed the required period of vacancy and the floor space cap, means that any of the buildings or units could be vulnerable to loss for residential use at any given time. This risk is exacerbated by the town's good transport links (via both public and private transport), the proximity of established residential areas and the residential character of many buildings in the town centre. In this context, there could be significant potential for building owners to seize on the opportunities provided by Class MA, thus harming the vitality, viability, and vibrancy of the town centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- The Kings Arms Public House, 156 Broadway (sui generis)

- Pure nightclub, 239 Broadway (sui generis)
- The Rose, 179 Broadway (sui generis)
- Studio 167 nightclub, 167 Broadway (sui generis)
- Trinity Chapel, 218 Broadway (F1)
- Geddes Place URC Church, Geddes Place (F1)
- Premier Inn London Bexley, 51 Albion Road (C1)
- Bexleyheath Working Men's Club, Royal Oak Road (F1)
- Bexley Magistrates' Court, Norwich Place (F1)
- Delta Hotels Bexleyheath, 1 Broadway (F1)
- The Prince Albert, 2 Broadway (sui generis)
- Bexley Central Library, 2 Townley Road (F1)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential elements have been excluded (e.g. Cardamom Court, 71 Albion Road which is a retirement housing complex). Christ Church and the associated vicarage (Broadway) have also been removed, along with Bexleyheath Clock Tower (Market Place) as these are statutory listed buildings (all designated Grade II), which are excluded from Class MA.

There are buildings in Class E use that have been removed from the scope of the Direction. The Asda building has been removed. This is the largest supermarket (in terms of floorspace) in the town centre, is large in scale and its external design does not lend itself to residential conversion, with no meaningful window openings, solid brick construction, and glazed facades. A large void internally gives the building a warehouse feel.

Similarly, the building complex that is formed of Sainsbury's, Poundland, JD Sports, TK Maxx and Pound Stretcher (et al) has been removed from the scope of the Direction. This complex sits to a height of 3 to 4 storeys and encompasses a large, enclosed yard which services the units. The units are large, with roughly half of the units also featuring internal mezzanine floorspace and, other than the commercial openings, lack any window openings. Units that have recently become vacant have been reopened with another Class E use very swiftly and the potential for these to be converted to residential use under Class MA is highly unlikely.

The Tenpin bowling alley building on Albion Road, also a Class E use, has been removed as it was purpose built and has operated in that use for decades. The construction of the building would render it difficult to be converted under Class MA, since the building is suspended above ground, with both surface-level and subterranean off street vehicle parking directly underneath the building. The building features a metal roof with metal cladding with no window openings.

## **Wholly unacceptable impacts**

The conversion of existing Class E commercial units within Bexleyheath town centre to residential use would harm the vitality and viability of the town centre. Particularly where the smaller and medium sized units are concerned, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups and office-based operations) which operate under Class E within the borough's principal town centre. Due to the nature and wide scope of businesses that operate under Class E within Bexleyheath, many buildings would be eligible for conversion under Class MA. The introduction of ground floor residential uses within the town centre would undermine the available offer, function and vitality of the designated town centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre would not contribute to these objectives.

Bexleyheath town centre, by virtue of its highly accessible location, is well placed to offer a wide range of local job opportunities thereby reducing resident's need to travel to their place of work. The potential loss of available commercial units within the town centre would significantly hinder these opportunities.

## **Conclusion**

For the reasons stated above, the Council considers that the buildings that are located within the red-line boundary within Bexleyheath town centre (defined by the blue-line boundary), as illustrated in the map at Figure 2, be covered by the Article 4 Direction.

# Crayford town centre assessment

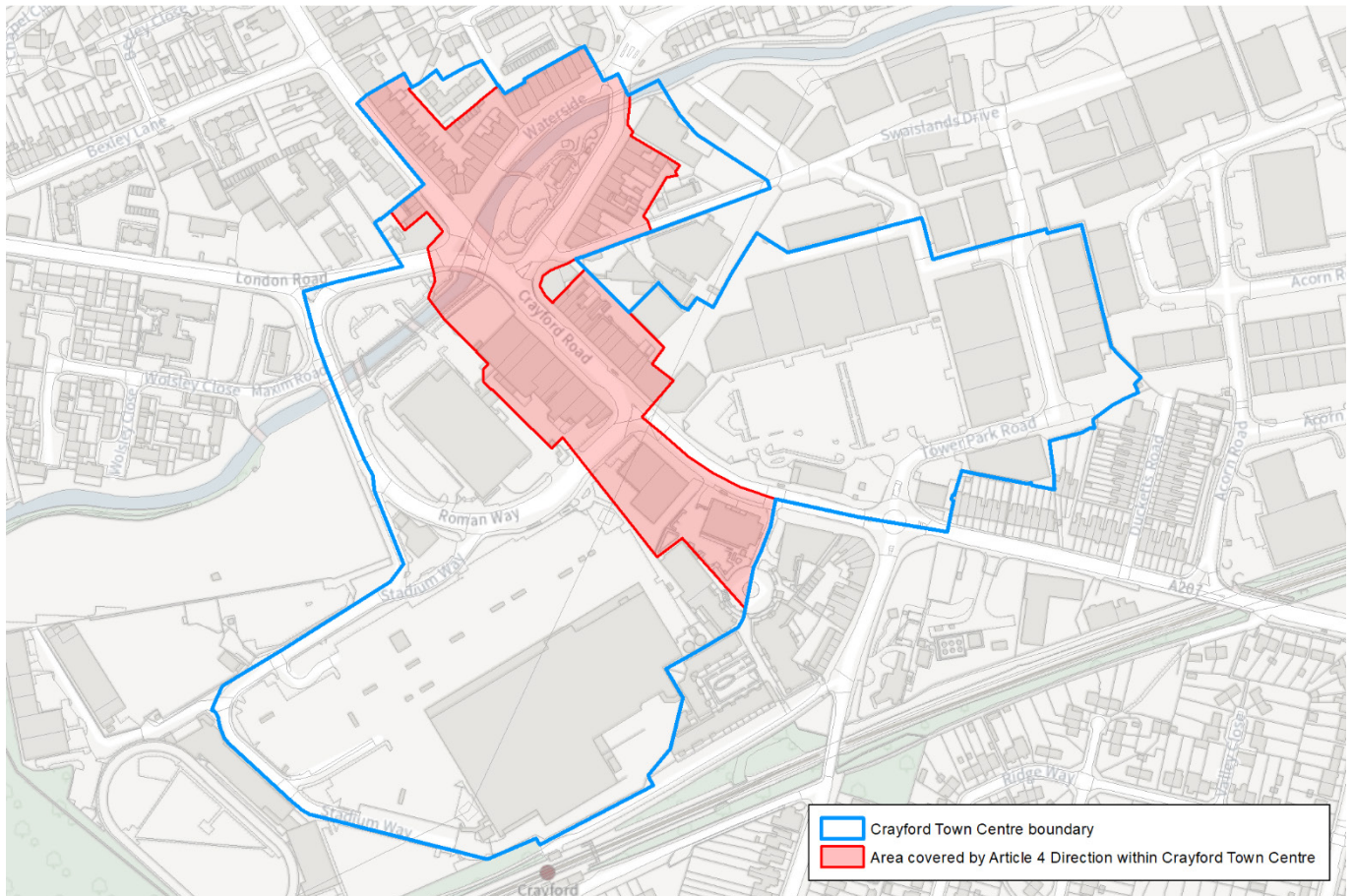


Figure 3: map of Crayford town centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Crayford is one Bexley's larger town centres, located to the east of the borough adjacent to the boundary with Dartford. It is identified as a district centre within the London Plan but did not feature within the rankings of the 2017 Javelin VENUESCORE report.

The town centre is located along the historic Roman Road of Watling Street and accessed from the east by Crayford Road and from the west by London Road. Crayford has a PTAL (Public Transport Access Level) of 3, which is similar to the other District centres within the borough. It is served by buses connecting the town to other destinations in Bexley and beyond and a railway station with services into London and destinations in Kent. The town is also close to road interchanges with the A2 and well connected by car.

Buildings within the town centre are mixed in character and typically 2 to 3 storeys with some higher elements. Many are of brick construction, whilst render and cladding also feature, including mixed façade treatment. Other than the Sainsbury's store, units within the Tower Retail Park and Aldi (and associated adjoining units), buildings exhibit a modest and residential-type character. Above the ground floor commercial units, many of the buildings are in residential use and have a residential appearance, with several window openings, creating a pleasing symmetry within the street scene.

There are several circa 1930s parade buildings, including 'Empire Parade' within the town centre. These buildings extend for multiple shop widths/frontages, depending on how many units are located within each parade. Other building types offer commercial units of mixed and varied scale, both in terms of their frontage length and floor space. This variety offers a choice of commercial accommodation allowing businesses to grow whilst remaining in the same area.

Uses within the town centre are heavily focused on commercial, business and service. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The town centre functions effectively as a retail destination where large businesses are hosted alongside smaller local businesses offering a range of services, facilities, employment and experiences.

The Crayford town centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The town centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of buildings within the town centre, and their external character (e.g. brick construction, existing window and door openings), it is considered that there are many examples of units which would be vulnerable to conversion under Class MA. As discussed, some of the buildings (especially those which are located within the existing parades) exhibit elements of residential character, with brick construction and door and window openings appearing with regular spacing across floor levels. Given their scale and individuality, most of the buildings within the town centre lend themselves to smaller scale commercial operations and start-ups and have the potential to house businesses that are primarily office-based.

Notwithstanding this however, given the change to Class MA which removed the required period of vacancy and the floor space cap, any of the units could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

The town centre is surrounded by residential areas on all sides whilst several buildings and areas within the town centre already exhibit residential uses above ground floor. Given this context and the well-connected nature of the town there could be the potential for unit owners to seize on the opportunities provided by Class MA, particularly regarding the smaller scale units where their character would lend themselves to wholly residential conversion. These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may harm the vitality and viability of the town centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- The Bear & Ragged Staff, 2 London Road (sui generis)
- The City of God, 193 Crayford Road (F1)
- Sainsbury's Petrol Station, Stadium way (sui generis)
- Crayford Library, 176 Townhall Square (F1)
- Crayford Social Club, 13 Crayford Way (F1)
- McDonald's, Tower Retail Park, Crayford Road (sui generis due to the significant drive-through and hot food takeaway element)
- The Clock Tower, situated in the Tower Retail Park (a structure as opposed to a building in use)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential



elements have been excluded (e.g. Lakedale Court, Waterside, which has been constructed to the rear of the 'Empire Building' parade). Manor House has also been excluded as this is a statutory listed buildings (designated Grade II) and therefore Class MA does not apply

There are buildings in Class E use that have been removed from the scope of the Direction. The Sainsbury's building has been removed. Recently extended, the sheer scale of the building and its external design, encompassing that of a 'big box' retail type, render the potential for the building to be converted to residential use under Class MA as highly unlikely.

Tower Retail Park has been removed. This store forms part of a wider complex of units comprising Boots, Next, The Entertainer, Poundland, Hobbycraft and Pound Stretcher (et al). This complex sits to a height of circa 3 to 4 storeys with servicing to the rear. The units are large, with some also featuring internal mezzanine floorspace. The buildings are constructed of brick, but other than the commercial openings, lack any window openings. Units which have recently become vacant have been reopened with another Class E use very swiftly and it is not considered that there is a realistic prospect that the buildings (or any subdivisions of such) would come forward under Class MA.

Similarly, the building containing the Aldi store and associated units (1-4 Roman Way) that form the rectangular block to the north of the Sainsbury's site has also been removed. The site was granted planning permission under 15/01458/FULM and has been complete for a few years. The planning permission included a condition which restricts the use of all units for retail sales only. As such, whilst the units will now fall under the scope of Class E (commercial, business and service), the planning condition restricts any other use outside of Class E.

## **Wholly unacceptable impacts**

The conversion of existing commercial units within Crayford town centre to residential would harm the vitality and viability of the town centre. Particularly where the smaller units are concerned, conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) which can operate under Class E. As discussed, due to the nature of businesses which fall under Class E, many buildings within the town centre would be eligible for conversion. It is considered that the introduction of ground floor residential uses within the town centre would undermine the function of the designated town centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre, following the loss of commercial operations which could be undertaken under Class E would not contribute to these objectives.

By virtue of its location, Crayford town centre is well-connected to offer a wide range of local job opportunities thereby reducing resident's need to travel to their place of work. The potential loss of available commercial units within the town centre would hinder these opportunities.

## **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary of Crayford town centre (defined by the blue-line boundary), as illustrated in the map at Figure 3, be covered by the Article 4 Direction.

# Erith town centre assessment

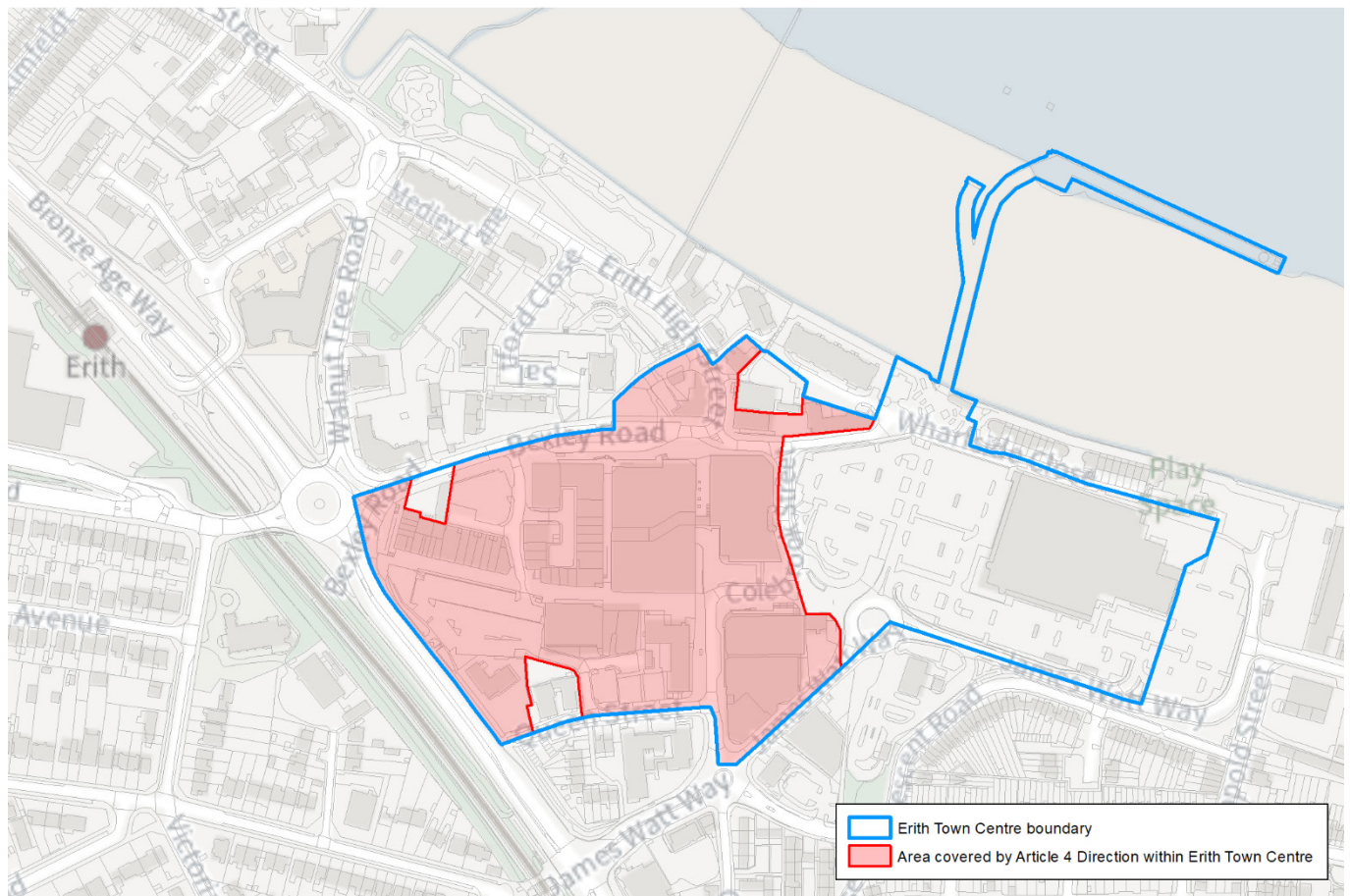


Figure 4: map of Erith town centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Erith is one of the borough's larger town centres, located in the north-east of the borough and adjacent to the River Thames. It is identified as a district centre within the London Plan and ranked at 1276 within the rankings of the 2017 Javelin VENUESCORE report.

The town centre has a PTAL (Public Transport Access Level) of 3, which is similar to the other town centres within the borough. Buses arrive/depart Erith along several routes, including the A206, Bexley Road and Manor Road to locations both inside, and outside of the borough. The town centre is also highly accessible by car.

Buildings within the town centre are typically 2 to 3 storeys with some higher buildings in the centre of the town, such as Parkspring Court. Buildings are also mixed in character with older and more modern redevelopments being located alongside one another. Distinct character groupings can be discerned in the west, centre and east of the town associated with particular developments such as the Morrisons store and the Erith Riverside Centre. Many buildings feature brick construction, with yellow facing brick being the most common choice. Render and cladding also feature, including areas of mixed façade treatment. A range of commercial unit sizes are on offer. Above ground floor level, many of the buildings have residential use and present a residential appearance, with multiple window openings, creating symmetry with the street scene.

As noted, buildings vary in size and scale across the town centre, thereby offering a variety of commercial accommodation to suit different businesses, together with the ability to develop and grow whilst remaining in the same area. Business uses within the town centre are heavily focused on commercial, business and

service (Class E), thereby providing a range of local services and job opportunities for residents. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. Whilst vacancy rates within the town centre, at 19%, are higher than any other town centre in the borough and greater than the national average, the town centre continues to function effectively as a retail destination. The Council is actively working to regenerate this town centre, and the retention of commercial floor space is paramount to achieving this ambition.

The Erith town centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The town centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of buildings within the town centre, and their external character (e.g. brick construction, existing window and door openings), it is considered that there are many examples which would be vulnerable to conversion under Class MA. Some of the buildings (particularly to the west of the town centre designation) exhibit elements of residential character whilst many commercial units lend themselves to a range of business sizes, including smaller scale commercial operations, start-ups, and those that are primarily office-based. Given the change to Class MA which removed the required period of vacancy and the floor space cap, any of the buildings could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

Erith town centre is located within an area where development is anchored by the location's relationship with the River Thames, with good transport links (both via public transport and vehicular). The town centre is surrounded by residential areas, whilst many buildings within the town centre are already in residential use above ground floor level. Given this context, there is the potential for building owners to seize on the opportunities provided by Class MA, particularly regarding the smaller scale units where their character would lend itself to residential conversion. These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may harm the vitality and viability of the town centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- Erith Playhouse, Erith High Street (F1)
- Erith Deep Wharf building, Wharfside Close (sui generis - conceals a sliding flood barrier for the Thames)
- Queen Street Baptist Church, Queen Street (F1)
- Celestial Church of Christ, Erith Noah's Ark Parish, 33 Bexley Road (F1)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply.

Whilst falling within Class E use, the Morrisons building has been removed from the scope of the Direction. The sheer scale and footprint of the building and its external design, encompassing that of the large supermarket retail type, would render conversion to residential use under Class MA very difficult.

## **Wholly unacceptable impacts**

The conversion of existing commercial units within Erith town centre to residential would harm the vitality and viability of the town centre. Particularly where the smaller commercial units are concerned, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) that operate under Class E. Due to the breadth of businesses which operate under Class E, many buildings within the town centre would be eligible for conversion. It is considered that the introduction of ground floor residential uses within the town centre would both undermine and dilute the commercial, business and service function of the designated town centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre, following the loss of commercial operations which could be undertaken under Class E would not contribute to these objectives.

Erith town centre, by virtue of its location, is well-connected to offer a wide range of local job opportunities thereby reducing resident's need to travel to their place of work. The potential loss of available commercial units within the town centre would hinder these opportunities.

## **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary within Erith town centre (defined by the blue-line boundary), as illustrated in the map at Figure 4, be covered by the Article 4 Direction.

# Lower Belvedere town centre assessment

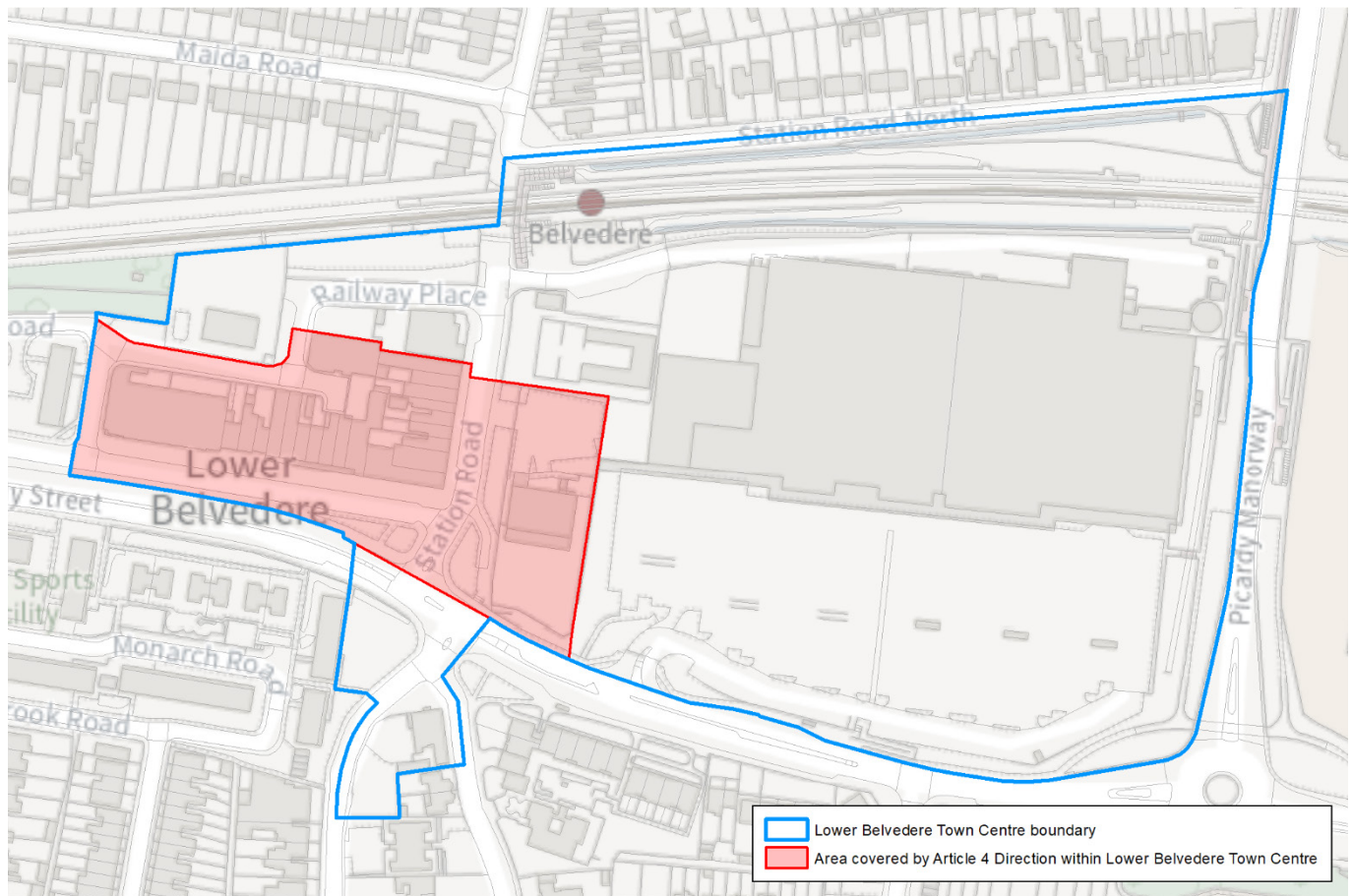


Figure 5: map of Lower Belvedere town centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area (town centre)

Lower Belvedere was designated as a district town centre in the Bexley Local Plan 2023. This town centre is located in the north of the borough, with Erith town centre to the east and Abbey Wood Village to the west. Lower Belvedere has a PTAL (Public Transport Access Level) of 3, which is average compared to other town centres in the borough. Belvedere railway station is located within the town centre, with trains travelling west to central London, and east to Slade Green. It is served by buses connecting the town to other destinations within the borough and beyond and is well connected by car.

Buildings within the west side of the town centre are typically 2 or 3 storeys. Buildings are mixed in character with the older and more modern mixing alongside one another. Buildings are constructed of brick, with red facing brick being the most common choice. Render and cladding also feature, including mixed façade treatment. Multiple window openings on the upper floors create a symmetry within the street scene, with residential use being common above the ground floor commercial units.

Commercial units in this part of the town centre vary in scale. The eastern part of the town centre is taken up by a large superstore 'warehouse' building occupied by Asda and B&Q. Uses within the town centre are heavily focused on commercial, business and service, with most ground floor units falling within Class E. Frontages covering differing widths offering a range of accommodation to suit businesses of different scales and types, with the ability for them to develop and grow whilst remaining in the same area. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase.

The Lower Belvedere town centre boundary has been designated in the Bexley Local Plan, representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The town centre is the area that the Council seeks to protect though the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of buildings within the town centre located in the west part of the town centre, it is considered that there are many examples of units which would be vulnerable to conversion under Class MA. These buildings exhibit elements of residential character, with brick construction and door and window openings appearing at regular spacing across floor levels. The scale and form of buildings lend themselves to smaller scale commercial operations, start-ups, and have the potential to house businesses that are primarily office-based.

The change to Class MA that removed the required period of vacancy and the floor space cap means that any of the existing buildings or units could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents. The risk is exacerbated by the town's good transport links (both via public transport and vehicular) and its proximity to the Elizabeth Line at Abbey Wood. The centre is surrounded by residential neighbourhoods and a number of buildings within the town centre exhibit a residential character. In this context, there could be significant potential for building owners to seize on the opportunities provided by Class MA, thus harming the vitality, viability, and vibrancy of the town centre. As a newly designated town centre, it is vital that the Council seeks to protect the use of buildings for commercial, business and service purposes.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- Electricity substation west of Asda, Station Road (sui generis)
- Railway building, Railway Place/Dylan Road (sui generis)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential elements have been excluded (e.g. the former Belvedere public house that has been converted into residential).

The joint Asda and B&Q building, which is in Class E use, has been removed from the scope of the Direction. This building is large in scale and its external design does not lend itself to residential conversion, with no meaningful window openings, metal cladding, glazed facades to the front and loading bays to the rear. Given its character and the recent investment in the site, it is considered that the potential for the building to be converted to residential use under Class MA is highly unlikely.

## **Wholly unacceptable impacts**

The conversion of existing commercial units to residential within the Lower Belvedere town centre would harm the vitality and viability of the town centre. Particularly where the smaller units are concerned within existing parades, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) that operate under Class E. As discussed, due to the nature of businesses operating under Class E, many buildings within Lower Belvedere town centre would be eligible for

conversion. It is considered that the introduction of ground floor residential uses within the town centre would undermine the function of the designated town centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre would not contribute to these objectives.

Lower Belvedere, by virtue of its location, is situated to offer a wide range of local job opportunities and thereby reducing resident's need to travel to their place of work. The potential loss of units within the town centre would hinder these opportunities.

## **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary of the Lower Belvedere town centre (defined by the blue-line boundary), as illustrated in the map at Figure 5, be covered by the Article 4 Direction.

# Sidcup town centre assessment

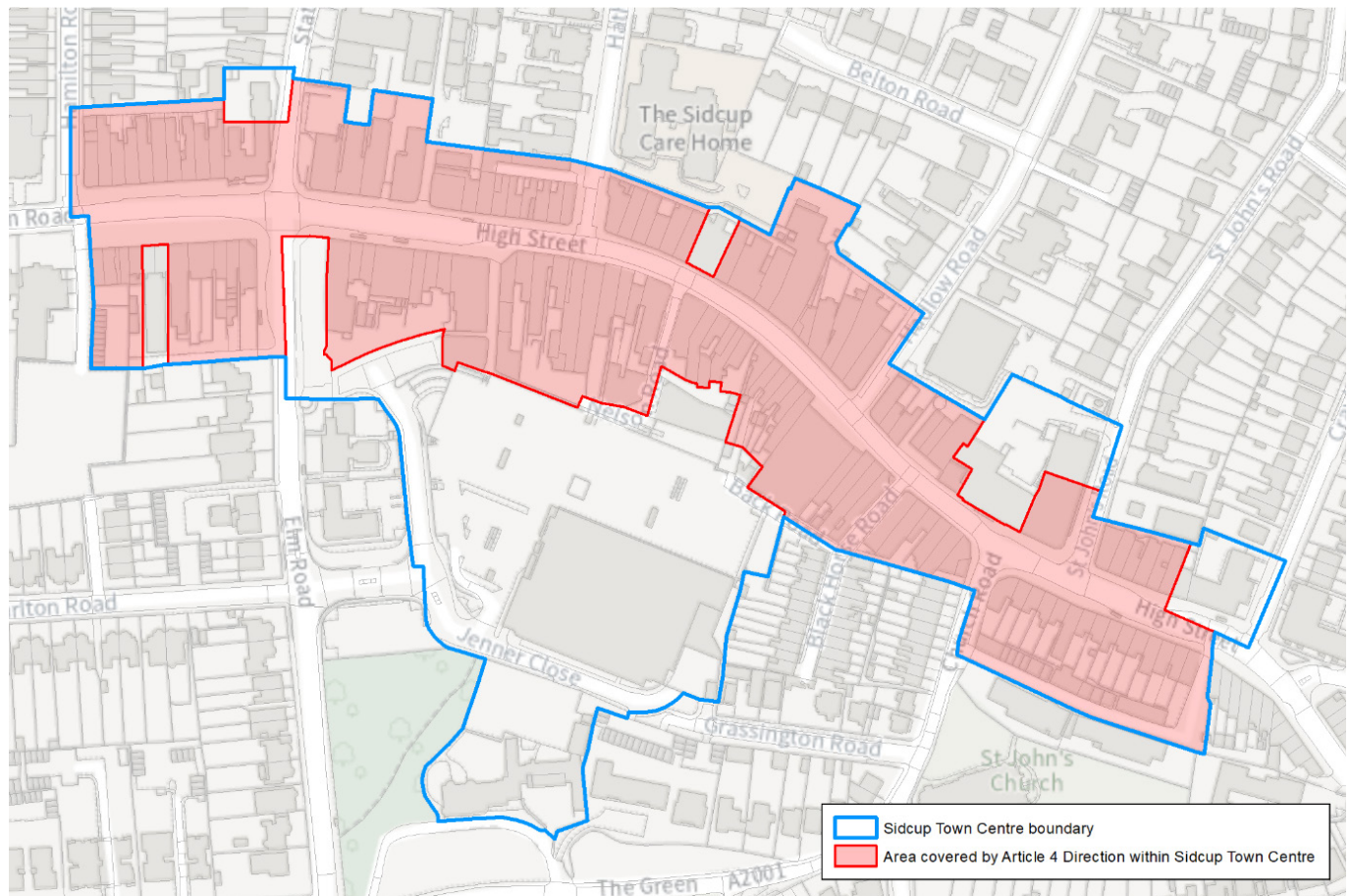


Figure 6: map of Sidcup town centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Sidcup is one of the borough's larger town centres, located in the south of the borough. Sidcup is identified as a district centre within the London Plan and ranked at 819 within the rankings of the 2017 Javelin VENUESCORE report (Sidcup placed third highest out of the ranked centres within the borough, behind Bexleyheath and Welling).

The town centre is located along Sidcup High Street (the A211) which travels east-west through the town centre. The main vehicular route north-south is Station Road (the A222). Sidcup has a PTAL (Public Transport Access Level) of 5 immediately around the junction of these two main routes that is second only to Bexleyheath (the borough's main town centre), but which then falls away rapidly to a PTAL of 3 and 4. Buses provide transport to locations within the borough and beyond. Sidcup is also served by the A20 that is located 5 minutes' drive to the south. As such, the town centre is accessible by both public and private modes of transport.

Buildings within the town centre are typically 2/3 storeys with some higher elements. They are also varied in character with the older and new mixing alongside one another. Most buildings are constructed of brick, with red facing brick being the most common choice. Render and cladding also feature, including mixed façade treatment. Buildings exhibit a modest and residential-type character. There are several circa 1930s parade buildings located within the town centre. These buildings extend across several frontages. Other building types also feature and offer intermixed commercial units of varied scales. This variety offers a choice of commercial accommodation allowing businesses to grow whilst remaining in the same area.



Above the ground floor commercial units, many of the buildings are in residential use and have a residential appearance, with several window openings, creating a pleasing symmetry within the street scene.

Uses within the town centre are heavily focused on commercial, business and service. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The town centre functions effectively as a retail destination where larger businesses are hosted alongside smaller local offerings which results in a range of services, facilities, employment and experiences being available. Sidcup town centre supports a lively nighttime economy, with several restaurants and the recently opened cinema (Sidcup Storyteller).

The Sidcup town centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The town centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Most of the buildings within the town centre lend themselves to medium scale commercial operations, start-ups, and have the potential to house businesses that are primarily office-based. However, given their scale, form and external character (e.g. brick construction, existing window and door openings), it is considered that there are many units which would be vulnerable to conversion under Class MA at any time, particularly given the recent PD change that removed the required period of vacancy. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

Moreover, the centre is well-located with good transport links (via both public and private transport) whilst much of the town centre is bordered by residential areas which are popular locations for housing, aided by their positioning and accessibility. In this context, there could be the potential for building owners to seize on the opportunities provided by Class MA thus harming the vitality and viability of the town centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- Sidcup Storyteller, 106 High Street (F1)
- Hill Top Tap, 7-8 Elm Parade (sui generis)
- The Tailor's Chalk, 47-49 High Street (sui generis)
- EPF Autoservices Ltd, Nelson Road (sui generis)
- Travelodge London Sidcup, 1-3 High Street (C1)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential elements have been excluded (e.g. the residential properties adjoining the Sidcup Storyteller building, the residential properties within the Hill View Court to the western boundary of the town centre and residential properties to the rear of Soul Street London, 87 Main Road). Manor House has also been removed as it is a statutory listed building (designated Grade II), which is excluded from Class MA.

Whilst falling within Class E use, the Morrisons building has been removed from the scope of the Direction. Recently extended (within the last few years), the building is the only retail supermarket of its size within the south of the borough. The scale of the building, its external design, with no meaningful window openings and solid brick construction, and recent investment in the site render the potential for the building to be converted to residential use under Class MA as highly unlikely.

### **Wholly unacceptable impacts**

The conversion of existing Class E commercial units within Sidcup town centre to residential would harm the vitality and viability of the centre as it would remove important opportunities for smaller businesses (including start-ups). Due to the nature of businesses operating in uses which fall under Class E, most of the buildings within the town centre would be eligible for conversion. It is considered that the introduction of unchecked ground floor residential uses within the town centre would undermine the function and offer of the designated town centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within Sidcup town centre would not contribute to these objectives.

Sidcup town centre, by virtue of its location, is well placed to offer a wide range of local job opportunities thereby reducing resident's need to travel to their place of work. The potential loss of available commercial units within the town centre would significantly hinder these opportunities.

### **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary within Sidcup town centre (defined by the blue-line boundary), as illustrated in the map at Figure 6, should be covered by the Article 4 Direction.

# Welling town centre assessment

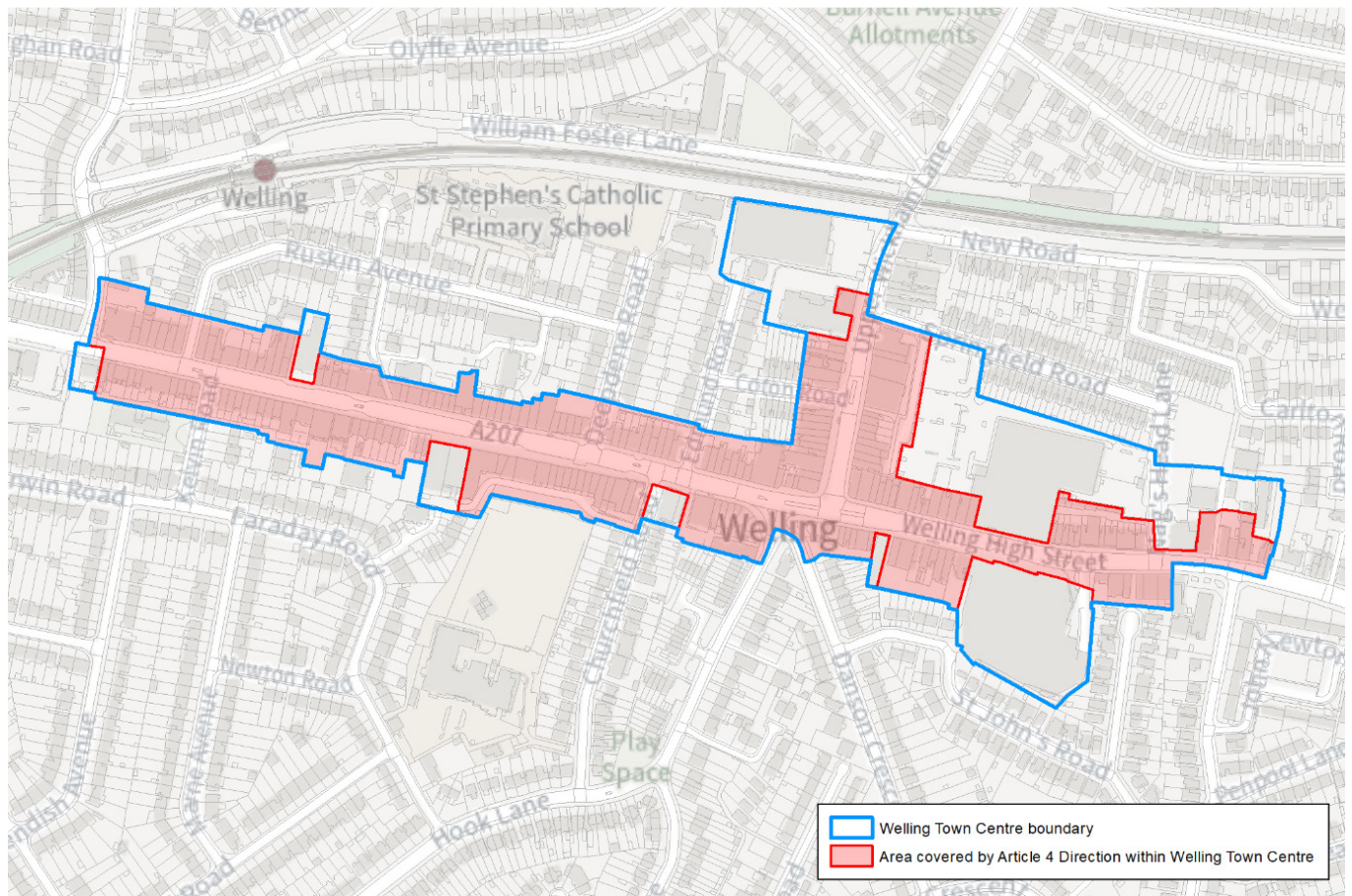


Figure 7: map of the Welling town centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Welling is one of the borough's larger town centres, located in the middle of the borough, to the west of the borough's main town centre of Bexleyheath. Welling is identified as a district centre within the London Plan and ranked at 558 within the rankings of the 2017 Javelin VENUESCORE report (second only to Bexleyheath out of the ranked centres within the borough).

The town centre is located along the historic Roman Road of Watling Street (the A207) with a PTAL (Public Transport Access Level) of 4, improving upon other centres within the borough. It is served by buses connecting the town to other destinations both within borough and beyond and is well connected by car.

Buildings within the town centre are typically 2/3 storeys with some higher elements. Buildings are mixed in character with the older and new being located alongside one another. Most buildings are constructed of brick (red facing brick being the most common choice.) Render and cladding also feature, including mixed façade treatment. Exceptions to this general palette include the Morrison's yellow brick building and the Tesco building, which is rendered. Both of these buildings exhibit a significant amount of glazing, particularly to the elevations where retail space is immediately housed.

There are several circa 1930s parade buildings within the town centre, including that of the 'Empire Parade' which is dated 1936 within its decorative pediment. The parade buildings extend across multiple frontages, depending on the parade width. Other building types which feature within the town centre offer commercial units which are of varied scale, both in terms of their frontages and in terms of their overall scale. This variety offers a choice of commercial accommodation allowing businesses to grow whilst remaining in the same area. Above ground floor level, many of the buildings are in residential use and have

a residential appearance, with several window openings, creating a pleasing symmetry within the street scene.

Uses within the town centre are heavily focused on commercial, business and service. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The town centre functions effectively as a retail destination where large businesses are hosted alongside smaller local businesses offering a range of services, facilities, employment and experiences. Vacancy rates are low within the town centre.

The Welling town centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The town centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of buildings within the town centre, and that of their external character, it is considered that there are many which would be vulnerable to conversion. Buildings (especially those which are located within the existing parades) exhibit elements of residential character, with door and window openings appearing with regular spacing across floor levels and are constructed of brick. Given their scale and individuality, most of the buildings within the town centre lend themselves to small and medium-scale commercial operations or start-ups, whilst also having the potential to house businesses which are primarily office-based.

Notwithstanding this however, given the change to Class MA which removed the required period of vacancy and the floor space cap, any of the units could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

The town centre is surrounded by residential areas on all sides whilst several buildings and areas within the town centre already exhibit residential uses above ground floor. Given this context and the well-connected nature of the town there could be the potential for unit owners to seize on the opportunities provided by Class MA, particularly regarding the smaller scale units where their character would lend themselves to wholly residential conversion. These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may harm the vitality and viability of the town centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- Welling Library, Bellegrove Road (F1)
- Plough & Harrow, 143 Bellegrove Road (sui generis)
- Bellegrove Social Club, 90 Bellegrove Road (F2)
- The New Cross Turnpike, 55 Bellegrove Road (sui generis)
- Nags Head, 37 Welling High Street (sui generis)
- DJW Coachworks, Bonners Yard, 29-31 Welling High Street (B2)
- Freedom Centre International Church, 38 Upper Wickham Lane (F1)
- The Salvation Army, Welling Sewing Centre (F1)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential elements have been excluded (e.g. residential elements to the eastern boundary of the town centre).

There are buildings in Class E use that have been removed from the scope of the Direction. The Morrison's store has been removed as it occupies a significant footprint and given its external design (representing a large supermarket with minimal window openings) makes the potential for the building to be converted to residential use under Class MA as highly unlikely.

Similar factors of consideration also apply to the Tesco store, which has been removed. The Tesco store is a more recent feature along Welling High Street, with residential units above. Given the scale of the building, its design, and the recent investment within the site, it is considered that there would not be a reasonable prospect of the site coming forward under Class MA.

The Lidl store (Upper Wickham Lane) has been removed as it features surface level parking, with the store footprint suspended above. Given these features, and recent investment within the site, it is not considered that there is a reasonable prospect that the site would come forward under Class MA.

## **Wholly unacceptable impacts**

The conversion of existing commercial units within Welling town centre to residential would harm the vitality and viability of the town centre. Particularly where the small/medium units are concerned within existing parades, any conversions under Class MA would remove important opportunities for businesses (including start-ups) that operate under Class E. Due to the nature and breadth of businesses operating under Class E, many buildings within the town centre would be eligible for conversion. It is considered that the introduction of ground floor residential uses within the town centre would undermine the function, and health of the town centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre, following the loss of commercial operations which could be undertaken under Class E, would not contribute to these objectives.

Welling town centre, by virtue of its location, is well-connected to offer a wide range of local job opportunities thereby reducing resident's need to travel to their place of work. The potential loss of available commercial units within the town centre would hinder these opportunities.

## **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary within Welling town centre (defined by the blue-line boundary), as illustrated in the map at Figure 7, be covered by the Article 4 Direction.

# Abbey Wood Village town centre assessment

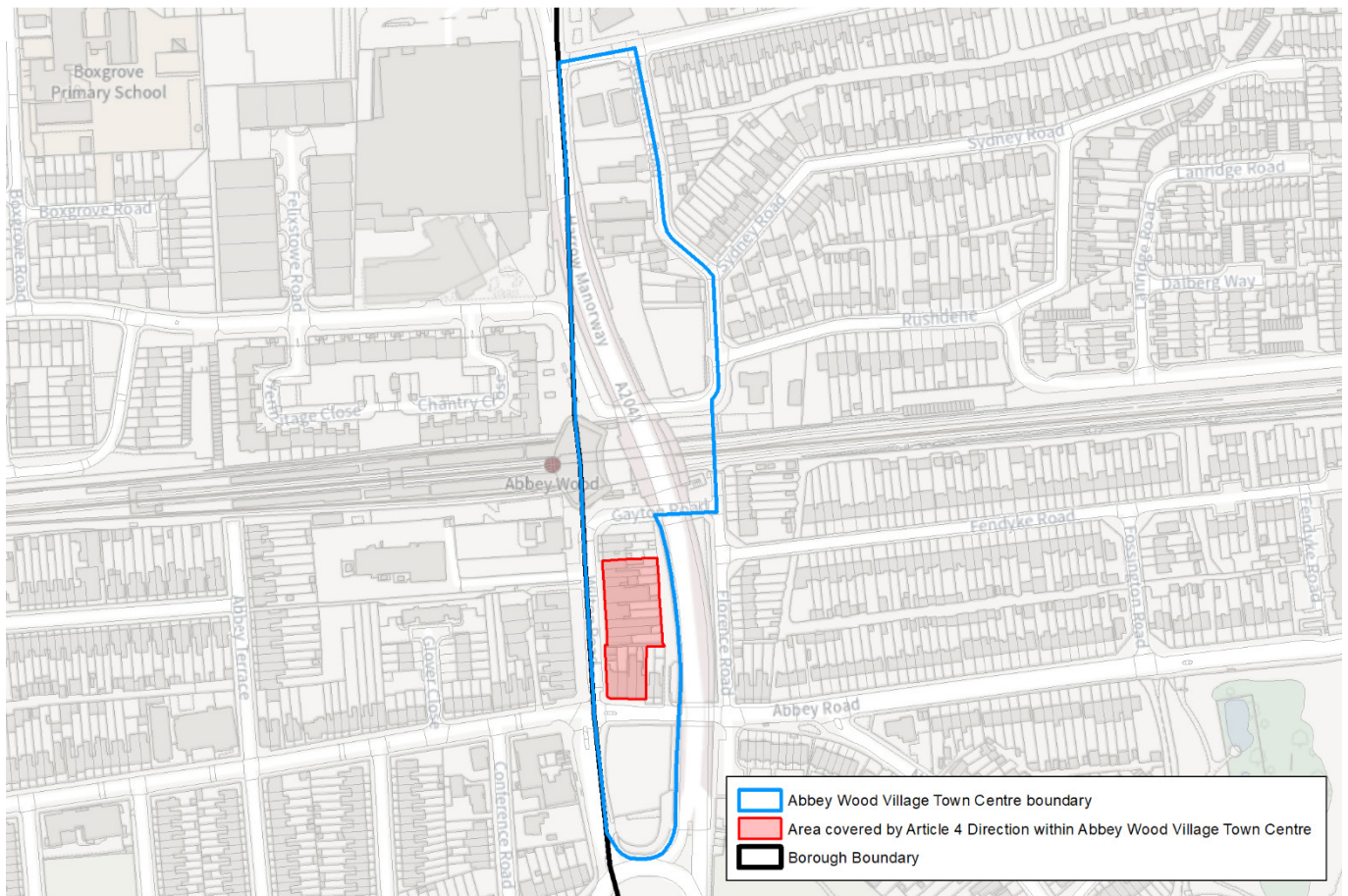


Figure 8: map of the Abbey Wood village local centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Abbey Wood Village, one of the borough's smaller local centres, is located in the north of the borough within the Thamesmead and Abbey Wood Opportunity Area (a London Plan designation). It is supported by new and enhanced transport infrastructure and has the potential to provide for new homes and/or jobs. Abbey Wood Village is bordered by residential areas to the east, with areas to the immediate north and south undergoing extensive residential development. To the north of the local centre are existing residential buildings, a petrol station and other commercial buildings which do not fall within Class E e.g. car sales garage and an exhibition centre. To the west of the local centre is the neighbouring parade which comprises commercial, business and service uses located within the Royal Borough of Greenwich.

Abbey Wood Village has a PTAL (Public Transport Access Level) of 4, which is relatively high compared to other local centres within the borough. The greater PTAL is attributed to Abbey Wood Station in the centre of the designated town centre. Abbey Wood Station is the southeastern terminus of the Elizabeth Line providing a direct link into Central London, and beyond. Buses arrive/depart Abbey Wood Village along Wilton Road, the A2041 to the west, and the B213 to the south. Buses provide public transport links both within the borough, and out of the borough heading west to Greenwich. Abbey Wood Village is reached with ease by car from the A2041, with the Gayton Road and Felixstowe Road car parks located within the local centre providing both long and short stay parking provision.

The centre comprises the commercial, business and service area located on the east side of Wilton Road, extending north along Harrow Manorway (the A2041) with a few commercial units located to the east. The local centre is characterised by a contiguous parade building which extends north-south along Wilton

Road. The local centre continues around the corner to the south along the B213 (Abbey Road) where a parade of 4 (No.) commercial units are located. All buildings within the local centre provide opportunities for smaller commercial units.

Buildings within Abbey Wood Village are characterised by 2 storey development, are typically characterful and older examples, with no modern infill. The existing buildings are of brick construction, with render and pebbledash finishes to the first-floor level (mock-Tudor panelling is also a feature to the first-floor level for some properties). All buildings exhibit pitched tiled roofs, and there are evenly spaced window openings which create a form of symmetry within the street scene. The existing buildings all exhibit a modest and residential-type character, with residential uses at first floor level commonplace.

Given the modest scale and form of buildings within the local centre, the commercial accommodation available suits smaller businesses, start-ups, and office accommodation. Uses within Abbey Wood Village are heavily focused within that of commercial, business and service. The local centre functions effectively as a retail destination where businesses sit alongside one another offering a range of services, facilities, employment opportunities and experiences. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase.

## **Risk of conversion**

As outlined, these buildings exhibit elements of residential character, with door and window openings appearing with regular spacing across the first-floor level, with buildings being constructed of brick. Given their scale and individuality, these buildings currently lend themselves to smaller scale commercial operations, start-ups, whilst also having the potential to be occupied by businesses that are primarily office-based. It is considered that these existing buildings would be highly vulnerable to conversion under Class MA. Businesses need a critical mass to thrive and a loss of the economic offer will affect this.

Given the change to Class MA removing the required period of vacancy, any of the buildings could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents. As detailed, the site is well-located with good transport links (both via public transport and vehicular), and within an area which is subject to ongoing investment (as the site is located within the Thamesmead and Abbey Wood Opportunity Area). The recent opening of the Elizabeth Line will also inevitably increase the area's attractiveness for conversion to residential over time.

Several buildings within the local centre already exhibit residential uses above ground floor. There are also buildings which are already in residential use at ground floor level, at either end of the parade on Wilton Road, which have been removed from the scope of the Direction. The surrounding residential context (and that occurring within the local centre itself), creates the potential for building owners to seize on the opportunities provided by Class MA. This is of particular risk within Abbey Wood Village as smaller scale units feature heavily and their character and appearance particularly would lend themselves to residential conversion. The existing layout of roads and transport connections, coupled with the types of buildings within the local centre would also lend the buildings to the real potential for residential conversion.

These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may lead to the harm of the vitality and viability of the designated local centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- BP, 84-89 Harrow Manorway (sui generis)

- Commercial Heating Spares Limited, 4 Sedgemere Road (B8)
- Automech, 6 Sedgemere Road (B2)
- Acorn Exhibitions, 8 Sedgemere Road (B2)

These buildings have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential buildings (505 and 507 Abbey Road, 24, 26 and 28 Wilton Road, 10, 12 and 14 Sedgemere Road) have been excluded.

### **Wholly unacceptable impacts**

The conversion of existing commercial units within Abbey Wood Village to residential use would harm the vitality and viability of the local centre. Given that Abbey Wood Village is one of the best-connected smaller centres in the borough and will be subject to significant development activity because of the Elizabeth Line services, it is critical that it also forms a hub for local services and facilities to serve the local population. The centre is characterised by smaller commercial units, and any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) that operate under Class E. As discussed, due to the nature of businesses operating in uses which fall under Class E, most buildings within the local centre would be eligible for conversion under Class MA. It is considered that the introduction of ground floor residential uses within the local centre would undermine the important function of Abbey Wood Village.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre would not contribute to these objectives.

Abbey Wood Village, by virtue of its location, is well-connected to offer a wide range of local job opportunities and thereby reducing resident's need to travel to their place of work. The potential loss of units within the town centre would hinder any potential for these opportunities.

### **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary within Abbey Wood Village (defined by the blue-line boundary), as illustrated in the map at Figure 8, be covered by the Article 4 Direction.



# Bexley Village town centre assessment

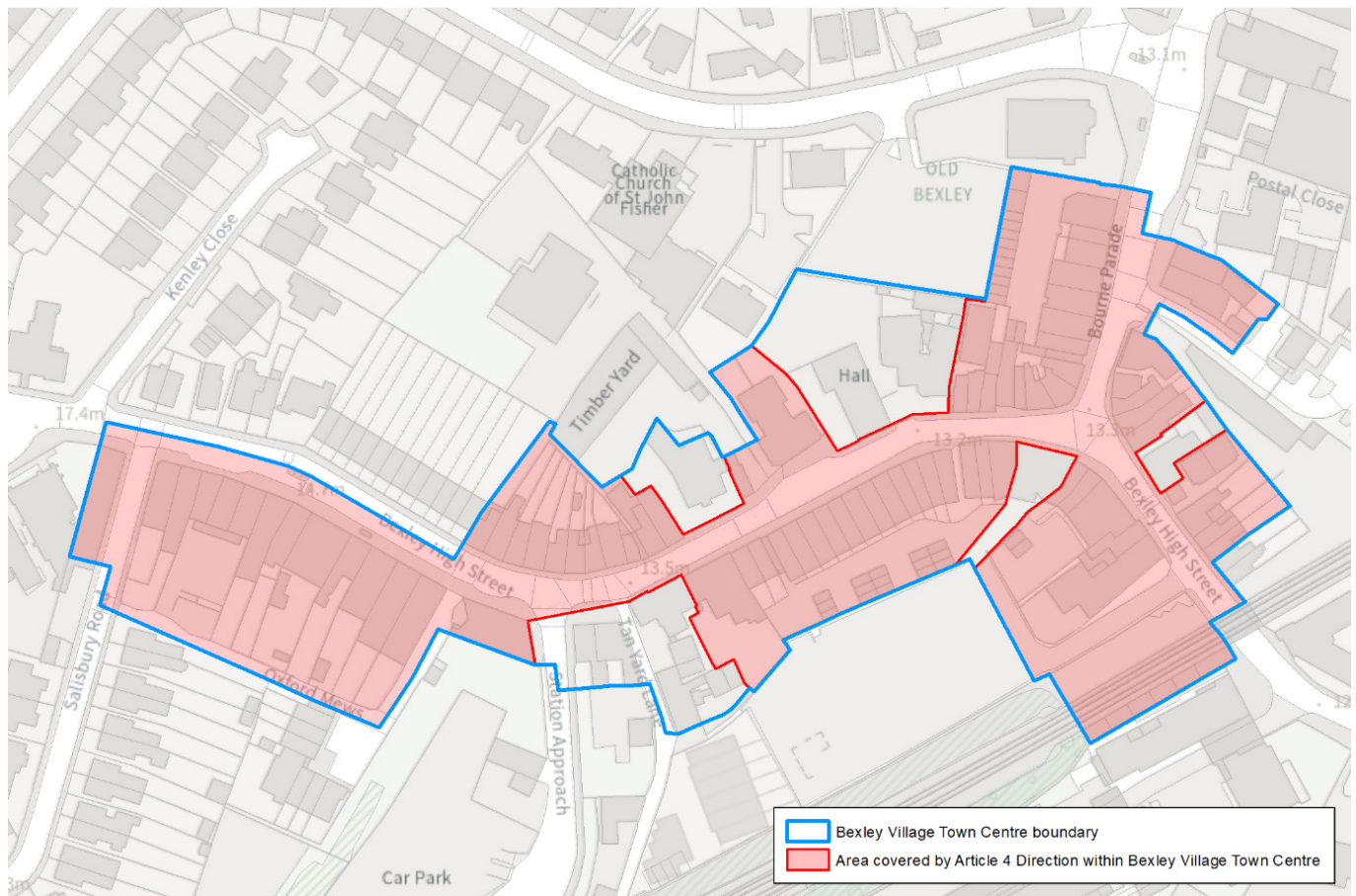


Figure 9: map of the Bexley Village local centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Bexley Village is one of the borough's smaller town centres located within the east of the borough and is identified as a Local Centre within the Bexley Local Plan 2023. The village is designated as a Conservation Area under the Planning (Listed Buildings and Conservation Areas) Act 1990. The Conservation Area designation covers the whole of the local centre.

Bexley Village is situated to the south of the A2 (one of the main arterial roads into London from the south-east) and accessed via a busy junction off the A2 (the Black Prince interchange). The local centre has a PTAL (Public Transport Access Level) of 2, which is similar to the other local centres within the Bexley borough. Buses arrive/depart the local centre along Bexley High Street and Bourne Road which provide transport links both within borough, and out of borough heading east to the Dartford. Due to the proximity of the village to the A2 and other main routes, the local centre is accessed with ease via both public and private modes of transport.

Buildings within the local centre are typically 2 to 3 storeys in height. Buildings are mixed in character with the older and more modern infill development standing alongside one another. Many buildings feature brick construction, with yellow facing brick being the most common choice. External materials of render and cladding also feature, including mixed façade treatment. The Bexley Village Conservation Area Appraisal and Management Plan (CAAMP) highlights these features. There are several parade-type buildings, within the local centre and these typically exhibit as townhouses in view (due to their 3-storey nature). These types of buildings extend for several shop widths/frontages, depending on the width of each parade.

Other building types which feature within the local centre offer commercial units which are of varied scale, both in terms of their frontages and in terms of their overall scale. Smaller commercial units are mixed with those which offer larger areas of floorspace, with smaller units typically offering a single frontage and the larger units extending across multiple frontages.

Beyond ground level, many of the buildings present with a visually residential appearance, with several window openings, creating symmetry with the street scene. There is a pleasing symmetry of openings to most buildings. This is especially true of the parade and townhouses style developments within the village. For these reasons, buildings are typically in residential use above the ground floor level.

As noted, buildings vary from small to medium scale across the local centre, thereby offering a variety of commercial accommodation to suit different businesses of different scales and types, whilst also providing the ability for these businesses to develop and expand while remaining in the same area.

Uses within the local centre are heavily focused within that of commercial, business and service with most uses falling within Class E. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The local centre functions effectively as a retail destination where large businesses are hosted alongside smaller local businesses offering a range of services, facilities, employment and experiences. Bexley Village provides for a thriving nighttime economy within the borough, with several restaurants, bars and public houses being located within what is a relatively small geographical area. During the day, the many cafes which are located within the local centre are popular.

The Bexley Village local centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The local centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of buildings within the local centre, and their external character and appearance (e.g. brick construction, existing window and door openings), it is considered that there are many examples of buildings which would be vulnerable to conversion under Class MA. Given their scale and individuality, most of the buildings which are located within Bexley Village lend themselves to smaller scale commercial operations, start-ups, with most also having the potential to house businesses which are primarily office-based.

Whilst vacancy rates are low, given the change to Class MA to removing the required period of vacancy, any of the units could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents. As explained, the site is well-located with good transport links (both via public transport and vehicular). The local centre is surrounded by existing residential development to the north, south, east and west and given the facilities and offer which are available within the local centres, the transport connections identified, and its village feel, all make Bexley Village a popular choice within the borough for those seeking to move house. Most buildings within the local centre are also already occupied in residential use above ground floor level.

Given existing surrounding residential development (and that within the town centre itself), there could be the potential for unit owners to seize on the opportunities provided by Class MA, particularly regarding the smaller scale units where their character would lend themselves to residential conversion. These

characteristics, when taken together, lead to a considerable risk of residential conversion and thus may harm the vitality and viability of the local centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- The George, 74 Bexley High Street (sui generis)
- The Millers Arms, 81 Bexley High Street (sui generis)
- Freemantle Hall, 51-75 Bexley High Street (F1)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. Greys Tea and Coffee House (34 Bexley High Street), Flowers of Bexley (36 Bexley High Street), The Railway Tavern (38 Bexley High Street), The Kings Head (65 Bexley High Street) and Bexley Village Hotel (57 and 59 Bexley High Street) have also been excluded as these are statutory listed buildings (all designated Grade II) and therefore Class MA does not apply.

## **Wholly unacceptable impacts**

Whilst it is noted that under the prior approval requirements the Council may consider whether changing the ground floor in a conservation area is considered to impact on the character or sustainability of the conservation area, it is considered that this assessment differs to the assessment which would be made in terms of the vitality and viability of the local centre terms of commercial offer and opportunities. It is also not exactly clear what is meant by the sustainability of a conservation area. Thus, it remains to be considered that the conversion of existing commercial units within Bexley Village to residential would harm the vitality and viability of the local centre.

Particularly where the smaller units are concerned within existing parades, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) that operate under Class E. Due to the nature of businesses operating in uses which fall within Class E, many buildings which are located within the local centre would be eligible for conversion under Class MA. It is considered that the introduction of ground floor residential uses within the village would undermine the function of the designated local centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre, following the loss of commercial operations which could be undertaken under Class E would not contribute to these objectives.

Bexley Village, by virtue of its location, offers a site which is well-connected to offer a wide range of local job opportunities and thereby reducing resident's need to travel to their place of work. The potential loss of units within the local centre would hinder any potential for these opportunities.

## **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary within the Bexley Village local centre (defined by the blue-line boundary), as illustrated in the map at Figure 9, be covered by the Article 4 Direction.

# Bexleyheath Station town centre assessment

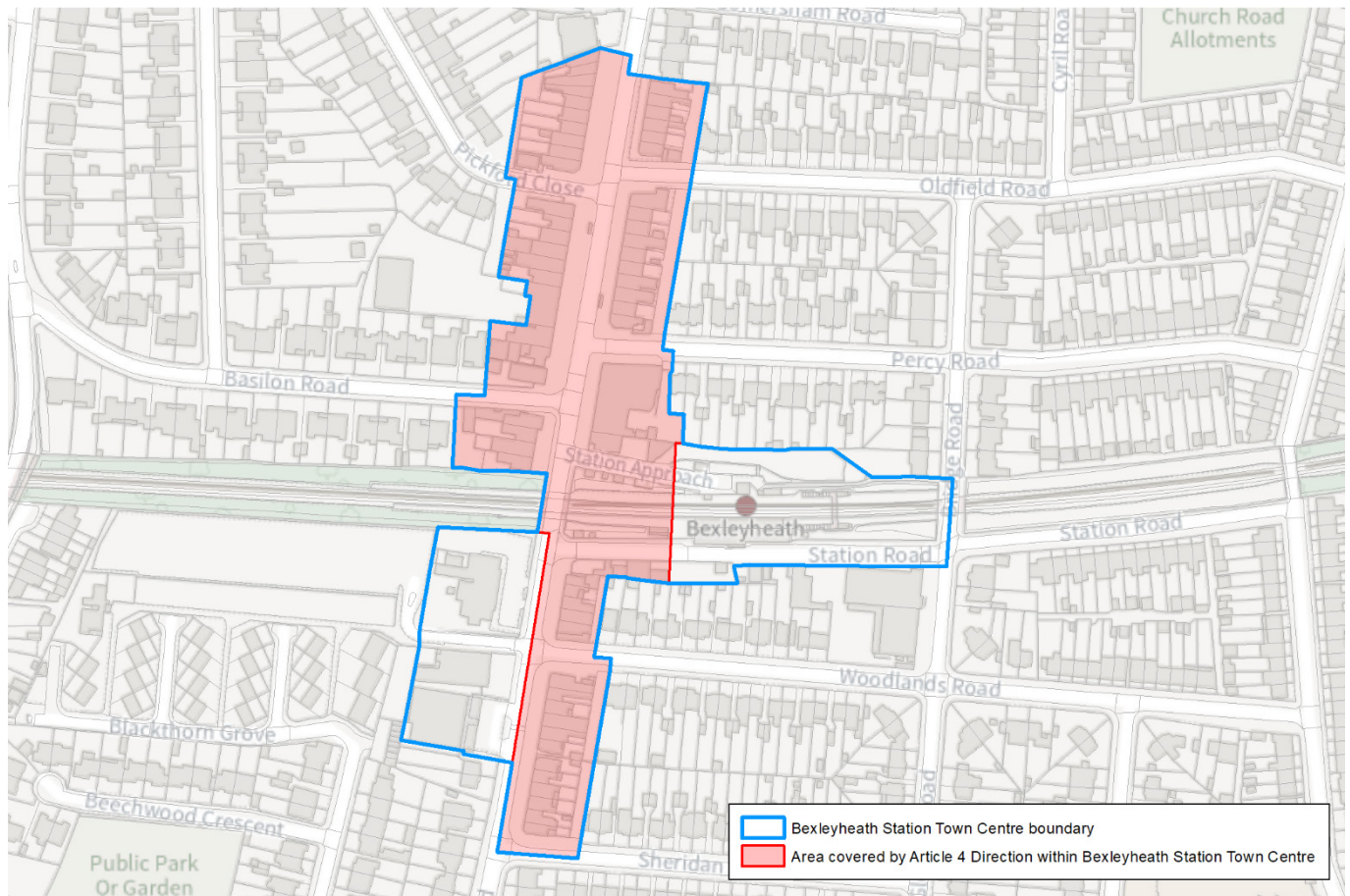


Figure 10: map of the Bexleyheath Station local centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Bexleyheath Station is one of the borough's medium sized centres, located at the heart of the Bexley borough and identified as a local centre within the Local Plan. Whilst named after the borough's Major Centre of Bexleyheath, the Bexleyheath Station local centre is located at a distance from its namesake, an approximate 20-minute walk from Bexleyheath itself.

The local centre is linear in shape, extending north to south along Pickford Lane. The centre is accessed along Pickford Lane (the name changes to Avenue Road further south) and from various minor roads east and west. The local centre has a PTAL (Public Transport Access Level) of 4, which is one of the best scores for local centres within the borough. Buses arrive/depart along Pickford Lane, with Bexleyheath train station located centrally within the centre. Buses provide transport links both within and outside the borough, with trains heading west to central London and east to Dartford and beyond. The centre is reached with ease by car from the above routes, with the Avenue Road car park being located to the south of the local centre, providing long and short stay off-street vehicle parking provision.

Buildings within the local centre typically exhibit 2/3 storey development. Buildings are quite mixed in character, but the majority constructed of brick, with red facing brick being the most prevalent choice. Other buildings feature render and cladding, with the larger commercial units exhibiting large, glazed areas. The local centre is characterised by a number of 1930s parade buildings, including that of 'New Parade'. These parade buildings extend for several shop frontages. There are few examples of more individual, standalone buildings within the centre. Above ground floor level, many of the buildings within

the centre present a residential appearance, with several window openings, creating symmetry with the street scene. For this reason, units typically have residential use at their upper storeys above.

Given the size and shape of the local centre, Bexleyheath Station offers commercial units which are of small and medium scale and form both in terms of their frontages and width/depth, and in terms of their overall scale and footprint. There is a mix of commercial units available, adding to the vitality, viability, and vibrancy of the local centre. This also offers a variety of accommodation to suit different business scales and types, with the ability of businesses to develop and grow whilst remaining in the same area. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase.

Uses within the local centre are heavily focused within that of commercial, business and service (Class E). The local centre functions effectively as a retail destination, offering a broad range of services, facilities, employment, and experiences. Vacancy does not appear to be long-term within the area.

The Bexleyheath Station local centre boundary has been designated in the Bexley Local Plan, representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The local centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of the smaller and medium sized buildings within the local centre, it is considered that there are many examples of units which would be vulnerable to conversion under Class MA.

As discussed, several of the buildings (particularly within existing parades, and/or that of individual buildings) exhibit elements of residential character, with door and window openings appearing with regular spacing across floor levels and brick construction. There is also an element of individuality amongst the buildings and parades which would make them attractive prospects for conversion under Class MA. Similarly, for these reasons most of these buildings lend themselves to smaller scale commercial operations, start-ups, or service businesses that are primarily office-based (all examples of which are necessary to the viability and vitality of the town centre). Loss of units and available floorspace will hinder the opportunities of businesses to function within a very sustainable, and accessible town centre.

Notwithstanding this however, given the change to Class MA which removed the required period of vacancy and the floor space cap, any of the units could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

As mentioned, the town centre is also bordered by existing residential areas. Several buildings within the town centre already exhibit residential uses above ground floor. There are also some existing ground floor residential elements within the town centre itself. There are several local schools near to the town centre, and as emphasised, transport links are some of the best in the borough. Given this context there could be the potential for owners to seize on the opportunities provided by Class MA, particularly regarding the smaller scale units where their character would lend itself to residential conversion in full. These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may harm the vitality, viability, and vibrancy of the local centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- William Camden, Avenue Road (sui generis)
- Hamilton Motors Ltd, 89 Avenue Road (sui generis)

These buildings, and the railway station car park, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply.

Whilst being in Class E use, the Sainsbury's Local building (81-87 Avenue Road) has been removed from the scope of the Direction. The building, one of the largest within the local centre, has recently been redeveloped and comprises an Argos within the store. The building is brick built with a glazed facade to the principal shopfront elevation and window openings at first floor. However, its external design and layout does not lend itself to a form of residential conversion and it is not considered that there is any realistic prospect that the proposed conversion of the building would come forward under Class MA.

The railway station building has also been removed from the scope of the Direction. Whilst the station building has been subdivided with some elements in Class E use, as the building provides the ticket office and associated facilities for the station, it is not considered that there is any reasonable prospect of the building coming forward for conversion under Class MA.

### **Wholly unacceptable impacts**

The conversion of units within the Bexleyheath Station local centre to residential would harm the vitality and viability of the local centre. Particularly where the smaller and medium sized units are concerned, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups and office-based operations) which operate under Class E. Due to the nature and wide scope of businesses which operate in under Class E within the centre, many of the buildings within the town centre would be eligible for conversion under Class MA. The introduction of ground floor residential uses within the local centre would undermine the available offer, and function of the area.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The loss of units within the town centre would not contribute to these objectives.

Bexleyheath Station local centre, by virtue of its location, is well-connected to offer a wide range of local job opportunities thereby reducing resident's need to travel to their place of work. The potential loss of available commercial units within the town centre would hinder these opportunities.

### **Conclusion**

For the reasons states above, the Council considers that the buildings which are located within the red-line boundary within Bexleyheath Station local centre (defined by the blue-line boundary), as illustrated in the map at Figure 10, be covered by the Article 4 Direction.

# Blackfen town centre assessment

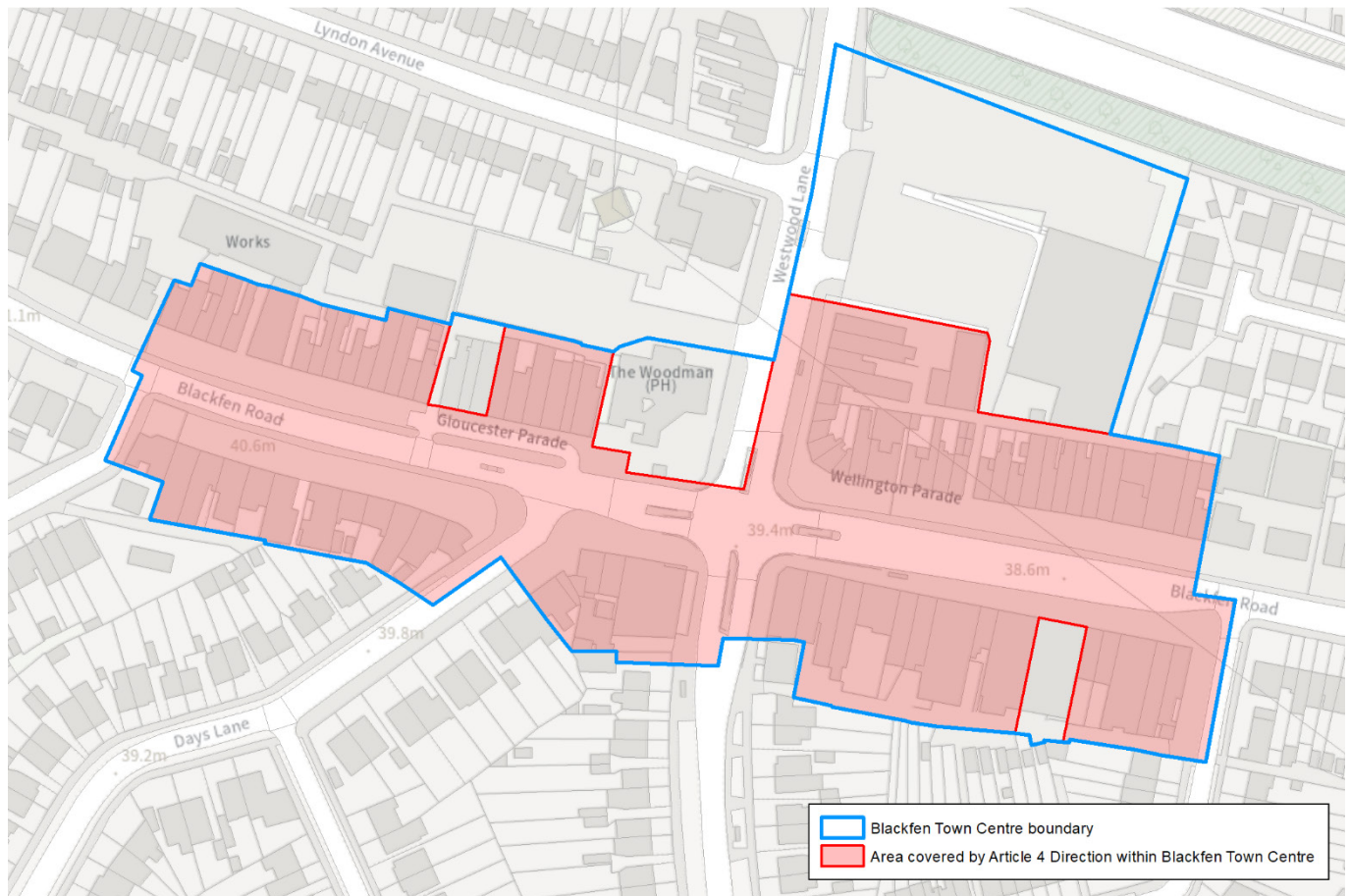


Figure 11: map of the Blackfen local centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area (local centre)

Blackfen is one of the borough's smaller town centres (identified as a local centre within the Local Plan) which is located within the middle of the borough. The local centre is closest to Welling town centre, which is located a short distance to the north, with Bexleyheath located to the east. The centre comprises the commercial, business and service area which is located along Blackfen Road (the A210) and runs east-west through the centre.

Blackfen has a PTAL (Public Transport Access Level) of 2, which is one of the lowest in the borough for a town centre. Buses arrive/depart Blackfen along Blackfen Road, and Westwood Lane which runs north. Blackfen is well connected by car with public on street short stay parking available.

The centre is characterised by long parades of shops, and smaller scale buildings which extend east-west along Blackfen Road (the A210). The Co-op store and George Staples public house are two larger stand-alone buildings within the town. All buildings within the local centre are 2 to 3 storeys in height, which is in keeping with the surrounding, predominantly residential, area. Buildings within the local centre exhibit a pleasing symmetry across the units, with evenly spaced window openings to the first-floor level. Buildings are of brick construction, with red facing brick being the main building material featured within the street scene. Render, pebbledash, and painted finishes also feature. Roofs are pitched with a few examples of flat, mansard style roofs. All older buildings within the parades feature chimneys. A modest and residential-type character predominates, with residential uses at first floor level the norm..

Given the modest scale and form of buildings within the local centre, the commercial accommodation available suits smaller businesses, start-ups and office accommodation, with some businesses occupying

wider frontages e.g. Tesco Express and Machine Mart. Uses within the Blackfen centre are mainly commercial, business and service. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The local centre functions effectively as a retail destination where businesses sit alongside one another offering a range of services, facilities, employment opportunities and experiences.

The Blackfen local centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The local centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

### **Risk of conversion**

Given the scale and form of buildings within the local centre and their external character, it is considered that the buildings would be highly vulnerable to conversion under Class MA. As outlined, all buildings within the centre exhibit elements of residential character, with brick construction and door and window openings appearing with regular spacing across the first-floor level. Given their scale and individuality, the buildings within the local centre lend themselves to smaller scale commercial operations and start-ups, whilst also having the potential to be occupied by businesses that are primarily office-based.

Given the removal of the required period of vacancy under Class MA, any of the buildings could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents. The local centre is surrounded in every direction by residential development, and given the size and character of the buildings, the prevalence of residential use above ground floor level in the centre and the good transport connectivity, conversion under Class MA may be particularly appealing for building owners in the future.

These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may lead to the harm of the vitality and viability of the designated local centre.

### **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- The George Staples, 273 Blackfen Road (sui generis)
- Blackfen Community Library and Rooted Coffee House, 7-9 Blackfen Road (F1)

These buildings, together with all car parks, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential units within Gloucester Parade have been excluded.

Whilst in Class E use, the Co-op store has been removed from the scope of the Direction. The scale of the building, and its external design (which represents that of a large supermarket) make the potential for the building to be converted to residential use under Class MA highly unlikely.

### **Wholly unacceptable impacts**

The conversion of existing buildings within Blackfen to residential use would harm the vitality and viability of the local centre. Given that the local centre is characterised by smaller commercial units, any conversions under Class MA would remove important opportunities for smaller businesses (including start-



ups) that operate under Class E. As discussed, due to the nature of businesses which operate in uses which fall under Class E, most buildings within the local centre would be eligible for conversion under Class MA. It is considered that the introduction of ground floor residential uses within the local centre would undermine the function, vitality and viability of local centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre would not contribute to these objectives.

The Blackfen local centre, by virtue of its location, is situated to offer a wide range of local job opportunities and thereby reducing resident's need to travel to their place of work. The potential loss of units within the town centre would hinder these opportunities.

## **Conclusion**

For the reasons states above, the Council considers that the buildings located within the red-line boundary within the Blackfen local centre (defined by the blue-line boundary), as illustrated in the map at Figure 11, be covered by the Article 4 Direction.

# Northumberland Heath town centre assessment

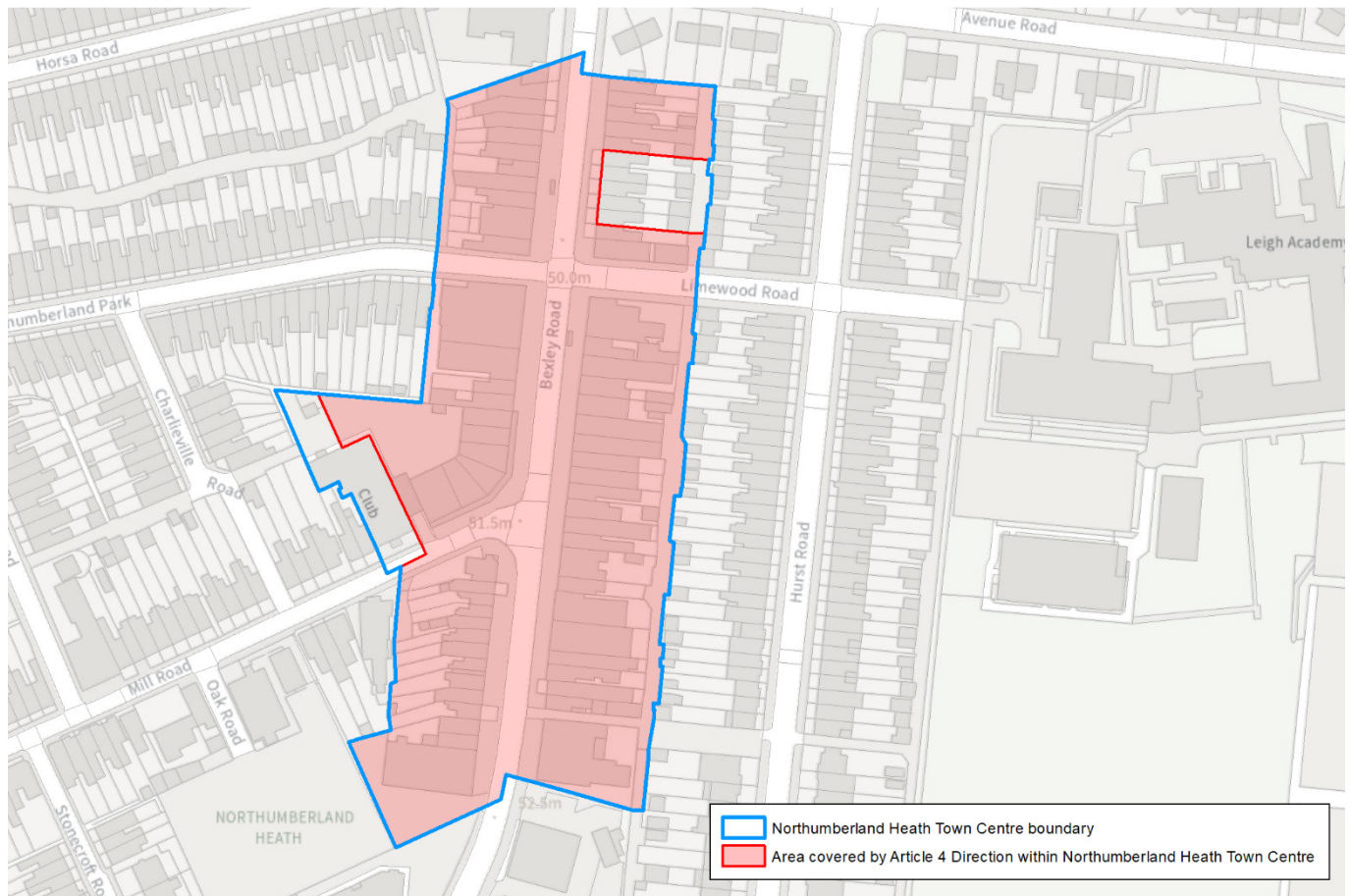


Figure 12: map of the Northumberland Heath local centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Northumberland Heath is one of the borough's smaller town centres (identified as a Local centre within the Local Plan). Located in the north-east of the borough, the local centre is close to Erith town centre (to the north-east). The centre comprises the commercial, business and service area which is located along Bexley Road (the A220) which runs north along the main parade.

Northumberland Heath has a PTAL (Public Transport Access Level) of 2, which along with Blackfen is the lowest of the other local centres within the borough. Buses stop along Bexley Road and Colyers Lane, providing transport within borough and beyond. Northumberland Heath is reached with ease by car.

The local centre is characterised by contiguous parade buildings extending along Bexley Road. Buildings within the centre do not exceed 2 storeys in height, which is in keeping with surrounding residential development. Buildings are characterful with pleasing symmetry across the units, exhibiting evenly spaced window openings to the first-floor level. Some buildings still feature original sash windows which add further interest within the street scene. Buildings are of constructed of both red and yellow facing brick, with render, pebbledash, and painted finishes also featuring on the street scene. All older buildings within the parades feature chimneys. The existing buildings all exhibit a modest and residential-type character, with residential uses at first floor level the norm.

Given the modest scale and form of buildings within the local centre, the commercial accommodation available suits smaller businesses, start-ups, and office accommodation, with some businesses occupying wider frontages e.g. Tesco Express and Euronics Wellingtons Electrical. Uses within Northumberland Heath are heavily focused on commercial, business and service. If the local offer diminishes, then people

may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The local centre functions effectively as a retail destination where businesses sit alongside one another offering a range of services, facilities, employment opportunities and experiences.

The Northumberland Heath local centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The local centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of buildings within Northumberland Heath and that of their external character, it is considered that the buildings would be highly vulnerable to conversion under Class MA. As discussed, all buildings within the local centre exhibit elements of residential character, whilst at the same time, their scale and individuality mean that these buildings lend themselves to smaller scale commercial operations and start-ups, whilst also having the potential to be occupied by businesses that are primarily office-based.

Given the change to Class MA which removed the required period of vacancy and the floor space cap, any of the units could be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents. The local centre is surrounded by residential development, and given the character of properties, conversion under Class MA may be particularly appealing for building owners in the future.

As explained, several buildings within the centre are already in residential use above ground floor level. Given this existing pattern of surrounding residential development (and occurring within the centre itself), there could be the potential for unit owners to seize on the opportunities provided by Class MA. This is of particular risk within Northumberland Heath as smaller scale units feature heavily and their character and appearance particularly lend themselves to residential conversion in full.

These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may lead to the harm of the vitality and viability of the designated local centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- North Heath Social Club, 8 Mill Road (F1)

This building has been excluded from the Direction as it does not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential buildings located to the north-east have been excluded.

## **Wholly unacceptable impacts**

The conversion of existing commercial units within Northumberland Heath to residential use would harm the vitality and viability of the local centre. Given that Northumberland Heath is characterised by smaller commercial units, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) that operate under Class E. As discussed, due to the nature of businesses operating in uses which fall under Class E, most buildings within the local centre would be eligible for

conversion under Class MA. It is considered that the introduction of ground floor residential uses within the local centre would undermine the function of local centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre would not contribute to these objectives.

Northumberland Heath, by virtue of its location, is situated to offer a wide range of local job opportunities and thereby reducing resident's need to travel to their place of work. The potential loss of units within the town centre would hinder potential for these opportunities.

## **Conclusion**

For the reasons stated above, the Council considers that the buildings located within the red-line boundary within the Northumberland Heath local centre (defined by the blue-line boundary), as illustrated in the map at Figure 12, be covered by the Article 4 Direction.

## Sidcup Station town centre assessment

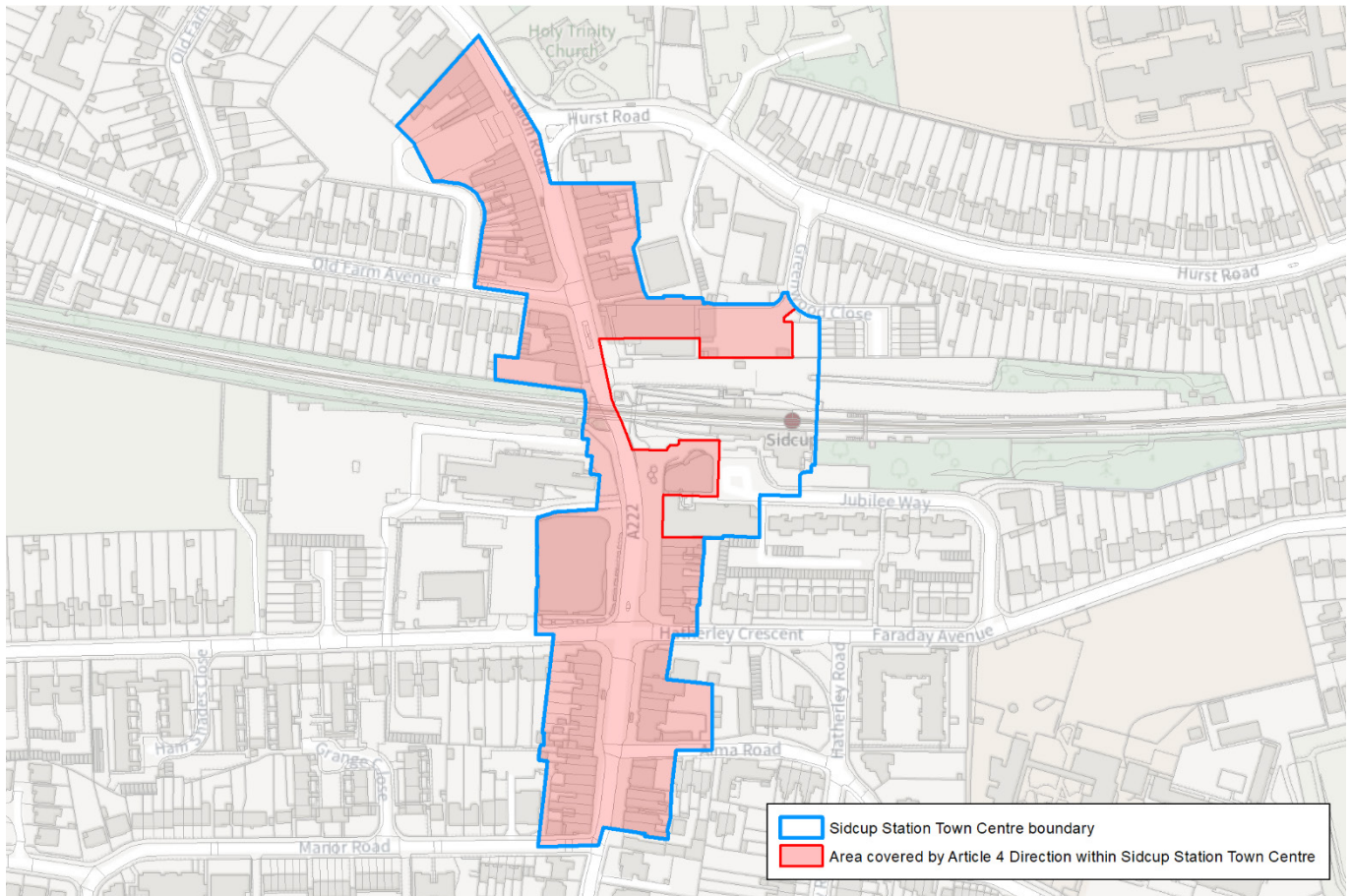


Figure 13: map of Sidcup Station local centre with the extent of the Article 4 Direction within the area shaded red

### Description of the area

Sidcup Station is one of the borough's medium sized town centres, located in the south of the borough. Sidcup Station is identified as a local centre which was newly designated within the Bexley Local Plan 2023. Sidcup Station is the most southern of the borough's local centres, located north of Sidcup town centre (one of the borough's main town centres), and situated along Station Road (the A222).

Sidcup Station has a mixed PTAL (Public Transport Access Level) of 4 and 5, which places the local centre as the best in terms of PTAL level for all local centres within the borough. Sidcup Railway Station is located within the centre which provides rail transport to central London (west) and Dartford and beyond (east). It is further served by buses connecting the town to other destinations in Bexley and beyond. The local centre is reached with ease via both public and private modes of transport.

Buildings within the local centre vary quite considerably in terms of scale, form and character, with a variety of building heights exhibited (two buildings are 8 storeys in height). Most buildings are constructed of brick, with red facing brick being the most prevalent choice. Render and cladding also feature, including mixed façade treatment.

There are a few circa 1930s parade buildings, including 'Hurst Court' which are of 3 storey construction. These buildings extend across several frontages. Other building types offer more modest parade style features and are of 2 storey construction. Most of the buildings within the town centre lend themselves to smaller commercial operations, start-ups, and have the potential to house businesses that are primarily office-based. Other building types offer commercial units of mixed and varied scale, both in terms of their frontage width and floor space. This variety offers a choice of commercial accommodation allowing

businesses to grow whilst remaining in the same area. Above ground floor level, many of the buildings are in residential use and have a residential appearance, with several window openings, creating a pleasing symmetry within the street scene.

Uses within the local centre are heavily focused on commercial, business and service. If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The centre functions effectively as a retail destination where larger businesses are hosted alongside smaller local offerings which results in a range of services, facilities, employment and experiences being available. Sidcup Station also supports a lively nighttime economy, with a number of restaurants within it. During the day, the cafes and shops are always frequented.

The Sidcup Station local centre boundary has been designated in the Bexley Local Plan, representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The town centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

## **Risk of conversion**

Given the scale and form of buildings within the local centre, and that of their external character (e.g. brick construction, existing window and door openings), it is considered that there are many examples of units which would be vulnerable to conversion under Class MA. As discussed, some of the buildings (especially those which are located within the existing parades) exhibit elements of residential character, with door and window openings appearing with regular spacing across floor levels and are constructed of brick. Given the change to Class MA removing the required period of vacancy, any of the buildings could be vulnerable for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

As noted, the centre is well-located with good transport links (both via public transport and vehicular). Most buildings are already in residential use above ground floor level and given the pattern of existing surrounding residential development (and that exhibited within the town centre itself), there could be the potential for building owners to seize on the opportunities provided by Class MA, particularly regarding the smaller scale units where their character would lend themselves to residential conversion in full. The existing layout of roads and connections, coupled with the types of buildings within the local centre would also lend the buildings to the realistic potential of residential conversion. These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may harm the vitality and viability of the town centre.

## **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- The Iron Horse, 122 Station Road (sui generis)
- Explore Learning Sidcup, 110 Station Road (F1)

These buildings, and the railway station car park, have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply.

The railway station building has also been removed from the scope of the Direction. Whilst the station building has been subdivided with some elements in Class E use, as the building provides the ticket office

and associated facilities for the station, it is not considered that there is any reasonable prospect of the building coming forward for conversion under Class MA.

### **Wholly unacceptable impacts**

The conversion of existing commercial units within the Sidcup Station local centre to residential would harm the vitality and viability of the centre. Particularly where the smaller units are concerned, and those which are located within existing parades, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) that operate under Class E. Due to the nature of businesses operating in uses which fall under Class E, most of the buildings within the local centre would be eligible for conversion under Class MA. It is considered that the introduction of unchecked ground floor residential uses within the town centre would undermine the function and offer of the designated town centre.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within Sidcup town centre, following the loss of commercial operations which could be undertaken under Class E would not contribute to these objectives.

Sidcup Station local centre, by virtue of its location, is well-connected to offer a wide range of local job opportunities thereby reducing resident's need to travel to their place of work. The potential loss of available commercial units within the local centre would hinder these opportunities.

### **Conclusion**

For the reasons states above, the Council considers that the buildings located within the red-line boundary within Sidcup Station local centre (defined by the blue-line boundary), as illustrated in the map at Figure 13, be covered by the Article 4 Direction.

# Upper Belvedere town centre assessment

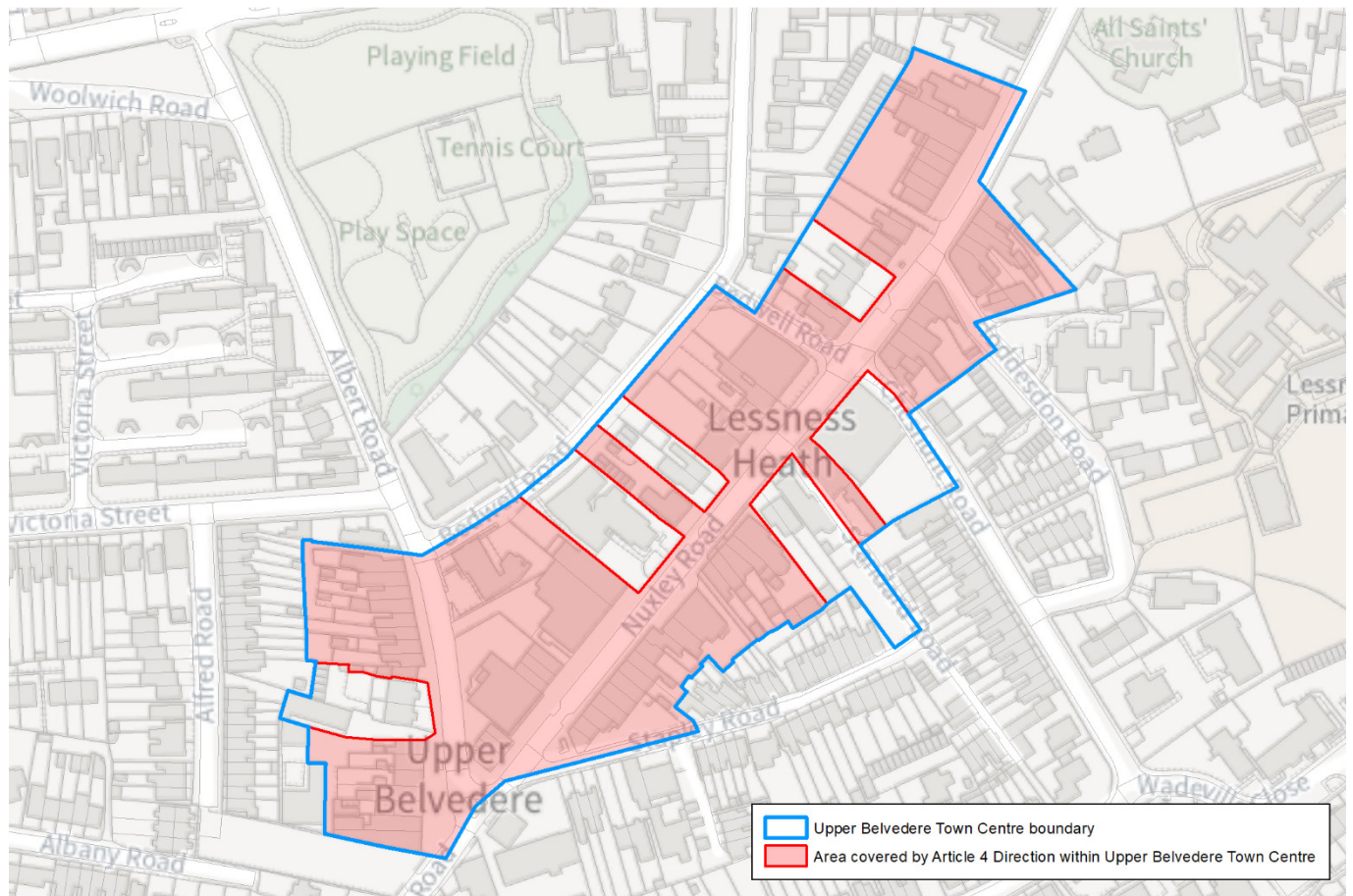


Figure 14: map of the Upper Belvedere local centre with the extent of the Article 4 Direction within the area shaded red

## Description of the area

Upper Belvedere is one of the borough's smaller town centres (identified as a local centre within the Local Plan). Located to the north of the borough, the local centre is situated closest to Erith town centre (a short distance to the north-east). The local centre comprises the core of the commercial, business and service area which is located along Nuxley Road.

Upper Belvedere has a PTAL (Public Transport Access Level) of 2, which is lower than other local centres within the borough. Buses arrive/depart Upper Belvedere along several routes, including Nuxley Road, the A206 to the north and Albert Road to the north-west to locations both inside, and outside of the borough. The local centre is accessible by car, with the Nuxley Road car park providing off-street vehicle parking provision.

The local centre is characterised by a variety of buildings, some of which form smaller parades, with examples of stand-alone buildings. Buildings are typically 2 to 3 storeys in height (in keeping with the residential areas which surround the local centre). Buildings are characterful overall with a pleasing symmetry replicated across many of the units. Some buildings still feature original sash windows which add further interest within the street scene. Buildings are constructed of brick (a mix of red and yellow examples featuring within the street scene), with render, pebbledash, and painted finishes are the main finishing materials, with vertical tile hanging also featuring. Roofs are a mix of pitched and those with flat roofs. Many of the older building examples within the centre feature chimneys. The existing buildings all exhibit a modest and residential-type character, with residential uses at first floor level the norm.



Given the modest scale and form of buildings within the local centre, the commercial accommodation available suits smaller businesses, start-ups, and office accommodation, with some businesses occupying multiple frontages. Uses within Upper Belvedere are heavily focused within that of Class E (commercial, business and service). If the local offer diminishes, then people may need to look further afield, meaning that the carbon footprint of purchasing goods could increase. The local centre functions effectively as a retail destination where businesses sit alongside one another offering a range of services, facilities, employment opportunities and experiences.

The Upper Belvedere local centre boundary has been redrawn to reflect changes in land use and redevelopment that has occurred over the years, with the area designated in the Bexley Local Plan representing the core commercial area for commercial, business and service uses to operate. Businesses need a critical mass to thrive and a loss of the economic offer will affect this. The local centre is the area that the Council seeks to protect through the Direction, with the units identified as being covered by the Direction helping to sustain the vitality and viability of the centre for its businesses and users.

### **Risk of conversion**

All buildings within the Upper Belvedere local centre exhibit elements of residential character, with door and window openings appearing with regular spacing across the first floor level and being constructed of brick. Given the change to Class MA that removed the required period of vacancy and the floor space cap, there is the potential for any of the existing buildings to be vulnerable to loss for residential use at any given time. The conversion of these units to flats will have an effect on the amount of jobs available. Viable and vital town centres are important not only to a healthy economy but to the well-being of local residents.

The local centre is surrounded by residential development in all directions, with several buildings within the centre already exhibiting residential uses above ground floor. Given this context there could be the potential for unit owners to seize on the opportunities provided by Class MA, particularly regarding the smaller scale units where their character would lend itself to residential conversion. The existing layout of roads and transport connections, coupled with the types of buildings within the local centre would also lend the buildings to the realistic prospect of residential conversion. These characteristics, when taken together, lead to a considerable risk of residential conversion and thus may lead to the harm of the vitality and viability of the designated local centre.

### **Exclusions and removals from the scope of the Direction**

The Council does not propose that the Direction cover the extent of the town centre. Having undertaken a granular assessment of the area, the following buildings have been excluded:

- Mulvihill Academy of Irish Dance, Albert Road (F1)
- Belvedere Social Club, 29 Nuxley Road (F1)
- Royal Standard, 39 Nuxley Road (sui generis)
- Belvedere Baptist Church, 50 Nuxley Road (F1)

These buildings have been excluded from the Direction as they do not fall within Class E use, and therefore Class MA does not apply. For the same reason, existing residential units (41-43 Nuxley Road, 20-22 Nuxley Road and 16-18 Albert Road) have been excluded.

### **Wholly unacceptable impacts**

The conversion of existing commercial units within Upper Belvedere to residential use would harm the vitality and viability of the local centre. Given that Upper Belvedere is characterised by smaller commercial units, any conversions under Class MA would remove important opportunities for smaller businesses (including start-ups) that can operate under Class E. Due to the nature and breadth of businesses

operating under Class E, most buildings within the local centre would be eligible for conversion. It is considered that the introduction of ground floor residential uses within the local centre would undermine the function of Upper Belvedere.

Bexley's town centres are identified to meet the economic objectives that are outlined within the National Planning Policy Framework (NPPF) and to ensure that businesses can invest, expand, and adapt. As the NPPF recognises, significant weight should be placed on the need to support economic growth and productivity. The introduction of ground floor residential uses within the town centre would not contribute to these objectives.

Upper Belvedere, by virtue of its location, is well-connected to offer a wide range of local job opportunities and thereby reducing resident's need to travel to their place of work. The potential loss of units within the town centre would hinder these opportunities.

## **Conclusion**

For the reasons states above, the Council considers that the buildings located within the red-line boundary within Upper Belvedere (defined by the blue-line boundary), as illustrated in the map at Figure 14, be covered by the Article 4 Direction.