

**Application No :** 12/03088/FULL1

**Ward:**  
**Bromley Town**

**Address :** Land At South Side Of Ringers Road  
Bromley

**OS Grid Ref:** E: 540250 N: 168845

**Applicant :** Crest Nicholson Regeneration Ltd

**Objections :** YES

**Description of Development:**

Erection of 1x11 storey (plus upper basement) and 1x9 storey (plus lower and upper basement) building comprising 148 flats (48x1 bedroom and 100x2 bedroom), 460sqm commercial unit (Class A3/A4), 77 car parking spaces, cycle parking, refuse and recycling stores, ancillary works including plant and equipment on ground floor and roof, together with vehicular access to Ravensbourne Road and Ringers Road and associated landscaping

Key designations:

Areas of Archaeological Significance  
Biggin Hill Safeguarding Birds  
Biggin Hill Safeguarding Area  
London City Airport Safeguarding  
London City Airport Safeguarding Birds

**Proposal**

Planning permission was granted in January 2008 for the demolition of a covered footbridge over Ringers Road and erection of one 10 storey and one 8 storey blocks comprising 97 one bedroom, 59 two bedroom and 4 three bedroom flats with 83 car parking spaces and motorcycle and bicycle parking and refuse storage (amendments to scheme permitted under ref. 06/01528 for 163 flats). Preliminary works have been carried out to implement the planning permission and it remains extant.

Planning permission is now sought for a revised scheme. The key changes between this proposed scheme and the implemented planning permission are as follows:

- introduction of commercial unit along Ringers Road
- additional storey to both blocks taking Block A from 10 to 11 storeys and Block B from 8 to 9 storeys
- reduction in number of flats from 160 to 148 to increase the number of 2 bedroom units and increase unit sizes to meet GLA Housing Design Guidance
- reduction in number of car parking spaces from 83 to 77
- introduction of public access through the site.

The proposed scheme comprises the following:

- 48 one bedroom and 100 two bedroom flats (including 40 shared ownership affordable units distributed throughout the development)
- 460 m<sup>2</sup> commercial unit (Use Class A3/A4)
- Block A will comprise 97 flats and Block B will comprise 51 flats
- 77 car parking spaces including 1 car club space and 17 disabled spaces
- 163 cycle spaces
- ancillary basement area for bin storage and plant
- landscaped amenity space at podium level including seating areas and a covered barbeque area.
- balconies to all but 6 of the flats.

The application is accompanied by a Planning Statement which covers archaeology, environmental considerations and affordable housing and includes the following points:

- site presents a key opportunity to deliver development in a sustainable location that contributes towards the regeneration of Bromley town centre in accordance with the aspirations of the Bromley Town Centre Area Action Plan (AAP)
- proposals reflect recent changes in planning policy - scheme complies with up to date housing standards including the latest London Housing Design Guide
- Section 106 agreement attached to planning permission 07/03632 has been in place for more than five years - should planning permission be refused then Crest have a fall back opportunity to apply to vary the agreement and seek a reduction in the planning obligations to make the scheme viable
- proposals reflect the overarching aspirations of the AAP and will support the development targets outlined by Policy OSG
- AAP has been prepared on the basis that there is an extant planning permission for development of the site
- scheme facilitates the creation of a pedestrian route running parallel to the High Street, reflecting aspirations of the AAP
- in compliance with the Opportunity Area Design Principles the part of the route which is being facilitated in the application site will have a quiet residential character and be overlooked by residential accommodation - activation of the area will be created by the commercial terrace adjacent to the walkway
- pre-application discussions with Officers raised concerns that the comprehensive redevelopment of Site G envisaged by the AAP may be compromised by the application proposals - this assertion is unfounded and the development would instead assist in encouraging the regeneration of other opportunity sites in Bromley town centre
- AAP clarifies that the use of different architects and design approaches is supported provided integration across the whole of Opportunity Site G can be achieved - application proposals fully incorporate the aspirations of the

AAP including increased permeability to ensure integration with future development proposals

- LBB intends to produce a Masterplan to inform the redevelopment of Opportunity Site G - given the extant scheme it is entirely reasonable that the Masterplan is developed to incorporate proposal
- AAP envisages redevelopment of the site in 11 to 15 years time - proposals are considered entirely compliant with the objectives of the AAP and delaying the redevelopment of the site would be contrary to the NPPF and the presumption in favour of sustainable development
- AAP states that Bromley town centre is an 'excellent location' for new housing supply and there is a need for residential development to support other town centre uses on Site G and to 'contribute to the creation of a more active and vibrant town centre'
- town centre contains a relatively small proportion of the Borough's housing stock (3.35%) and there remains a significant demand for more new housing
- LBB Housing Supply Update (June 2012) confirms the implemented scheme comprises part of the Council's five year housing supply
- AAP proposes 1,820 new residential units in the town centre with 1,180 on Site G – scheme will assist in meeting this objective.
- commercial floorspace will provide an active frontage onto Ringers Road visible from the High Street in accordance with the LBB aspirations to bring people back into to the town centre in the evening and also assist in meeting the development targets of Policy OSG
- scheme will increase residential population within the town centre bringing increased spending power that would be largely retained in the town centre whilst supporting other uses planned on Site G and supporting the night time economy
- direct and indirect employment will be generated by the commercial unit and through increased spending in the town centre and through construction of the development
- Council will receive increased revenue, including additional council tax revenue and New Homes Bonus (at least £900,000 over 6 years)
- new buildings will greatly improve this part of Bromley Town Centre with a modern high quality design that sits comfortably behind the High Street
- scheme will improve the permeability and legibility of the local area and result in an enhanced public realm
- redevelopment of the site will assist in boosting developer confidence to help kick start other town centre regeneration projects
- scheme includes 40 affordable housing units which will be indistinguishable from the private units and will significantly assist Bromley in meeting its affordable housing target
- Government has made clear that the flexible application of affordable housing policy will be necessary to ensure that residential schemes are delivered
- affordable units will meet a need from young professionals wishing to live in a town centre location and to make a first step on to the housing ladder
- Townscape Analysis has been undertaken to ensure there is no adverse impact on the surrounding area from the increase in height in the building from those previously permitted.

The application is accompanied by a Daylight Sunlight Assessment which concludes that the new scheme will not be materially different from the consented scheme and the occupiers of neighbouring dwellings will be unlikely to notice any difference between the two developments. It also concludes that the daylight and sunlight to the new dwellings and the amenity areas will accord with design guidance.

The application is accompanied by a Wind Assessment Update which concludes that the revisions to the previously approved scheme will make a negligible difference in terms of wind.

The application is also accompanied by the following:

- Design and Access Statement including a Lifetime Homes Assessment, Buildings for Life Assessment, Townscape Analysis, landscape and public realm proposals and refuse and recycling details
- Transport Statement
- Energy Statement
- Code for Sustainable Homes & BREEAM Pre-Assessment
- Surface Water Drainage Strategy
- Noise Report Update
- Statement of Community Engagement
- Ventilation and Extraction Statement
- CIL Information Form.

### **Location**

- 0.45ha site is located in the west of Bromley Town Centre within Bromley Town Centre AAP Opportunity Site G
- site was previously occupied by the 'back-store' of the former Army & Navy departmental store – it has now been cleared and is currently empty
- Ringers Road descends from High Street to Ravensbourne Road and provides the main frontage to the site whilst the vehicular access is from Ravensbourne Road
- lower half of Ringers Road and most of Ravensbourne Road are predominantly residential
- site is bound by retail/commercial development fronting Bromley High Street to the east
- there is a NHS renal dialysis unit on the western boundary of the site
- a Quaker church and a row of semi-detached houses are located to west of the site.

### **Comments from Local Residents**

Nearby residents were notified of the application and representations were received, which can be summarised as follows:

- out of character / poor design / excessive bulk
- loss of daylight and sunlight

- loss of privacy / overlooking
- increased noise and disturbance
- building will be closer to Quakers meeting house
- detrimental impact on pedestrian safety, particularly children
- detrimental impact on highway safety / vehicular access is on a blind bend / pre-emptive measures should be taken to address danger of vehicles sliding down access ramp on snow and ice / brick wall should be erected to protect Nutfield Court from out of control vehicles on access ramp
- additional traffic / traffic on Ravensbourne Road and Ethelbert Road has increased in recent years and tailbacks from Westmoreland Road/Masons Hill traffic lights frequently occur / congestion impedes emergency vehicles
- significant existing disruption and disturbance from vehicular activity including buses and delivery lorries
- access is too close to dialysis unit access
- inadequate car parking / loss of car parking spaces / increased demand for on-street car parking / currently inadequate resident's parking
- there are no proposals for treatment of the brick structure supporting the proposed amenity area – this will be an eyesore for Ravensbourne Road residents and an appropriate condition should be attached to any planning permission
- pruning of existing mature should be the subject of a planning condition
- increased pressure on local infrastructure and services
- increased crime and anti-social behaviour
- reduction in social housing
- increased flood risk
- development may result in subsidence in the area
- effect on water pressure
- disruption, noise and pollution from construction works
- detrimental impact on property values
- scheme will benefit town and local businesses
- new, good quality, well located housing stock is needed.

### **Comments from Consultees**

Metropolitan Policy Crime Prevention Design Adviser – no objections subject to a 'Secured by Design' condition

Environmental Health – no objections, subject to conditions

Thames Water - no objections.

Drainage – no objections, subject to conditions

English Heritage (Archaeology) - no objections

Sustainable development and renewable energy – no objections.

The Council's Housing Officer notes that the affordable housing provision comprises 27% of units and approximately 25% of habitable rooms which is below

the 35% policy compliant level. Furthermore, all affordable units are proposed to be intermediate (shared ownership) which is contrary to Policy H2 of the UDP. The applicants submitted a Financial Viability Assessment which has been independently reviewed and the Council has been advised that the applicants proposals are not unreasonable and that they could arguably have offered significantly less affordable housing. The proposals are considered acceptable subject to a review mechanism within a legal agreement to secure an additional payment in lieu of affordable housing should the viability of the scheme improve, and on the basis that the provision of these intermediate units is not contingent on public subsidy. The legal agreement would also need to require the scheme to meet the GLA's London Housing Design Guide standards, including floor-areas per flat and Code for Sustainable Homes Level 4.

The Council's Highways Engineer raises no objections to the proposal, subject to conditions and provision within a legal agreement for the recovery of loss of income from Pay and Display parking bays in Ringers Road and Ravensbourne Road. However, it is noted that the access to the cycle parking in the upper basement is tortuous, being through two 90 degree bends, two sets of doors and into and along a narrow corridor.

The applicant has revised the refuse storage arrangement in response to comments from the Council's Waste Advisers. A verbal update will be provided at the meeting.

The Greater London Authority have provided Stage 1 comments which are summarised as follows:

- site is highly accessible and suitable for a significant proportion of smaller units but the applicant should seek to provide some family sized housing in line with Policy 3.8
- residential density is in line with the London Plan and is acceptable
- inadequate children's play space
- in order for a tall building in this location to be considered acceptable it should be of outstanding design quality in its architecture, layout and residential quality – proposal is uninspiring and unimaginative and fails to enhance the town centre built form – given the prominent location of the building, its visibility from Bromley High Street and the fact that it is in an area identified for comprehensive redevelopment, the applicant should revise the architecture to create a more distinctive and attractive building, with high quality materials and detailing
- architects have illustrated how the proposal might fit in with AAP objectives through creating a new route through the site and a new public space and this is welcomed – however the configuration of built form and public space will make it challenging to provide a good quality frontage onto both Ringers Road and the proposed space as the ground floor of the building faces both sides, making it hard to accommodate plant rooms, refuse storage and other back of house uses without impacting on the quality of the public realm
- concerns are expressed regarding the residential design as follows:
  - there are a number of north facing single aspect units

- ground floor units facing the public realm do not have front entrances
  - scheme provides a good number of vertical circulation cores which are connected, creating long corridors – no more than 8 units should share communal space to create a strong sense of ownership over that space and to reduce potential security issues – applicant should relocate internal core within western block so that it is accessible from Ringers Road
- none of the entrance points provide level access into the building
  - public podium deck does not appear to be particularly welcoming due to the significant level change, steps and lifts up to it
  - applicant should reconsider providing a site heat network rather than individual boilers to the apartments and should provide a commitment to ensuring that development is designed to allow future connection to a district heating network should one become available
  - proposal accords with London Plan transport policy.

The applicants have since submitted revised plans and provided a response as follows:

- landscaping has been revised to meet GLA play space requirements
- appearance of the buildings are the same as previously approved with the exception of an additional storey
- lift core has been relocated within Block B and pedestrian access is provided from Ringers Road
- minor alterations to have been made to external commercial frontage and entrance to Block B to improve urban design quality
- retaining wall on eastern side of development has been reduced in height and replaced with glass and railings to allow views through
- retaining wall onto Ringers Road has been simplified and decluttered and this will increase the visual connectivity with the street
- topography of the site presents a major constraint to the proposed development – development provides pedestrian access via four shallow steps and a gently rising ramp – this raise in level allows passage under the entrance to Block A to the upper car park and to the cycle store and refuse store – should the block be lowered the link to the upper basement would not be possible without the loss of residential accommodation and/or the necessity to situate the commercial units directly onto Ringers Road, which would affect the vitality of this important area of the scheme
- applicant has investigated the lowering of the central podium deck to allow for level access – this would have significant effects on the provision of parking and ancillary accommodation located at upper basement level and would also require a significant amount of ‘cut’ which would need to be disposed off site which is not considered to be sustainable.

Any further comments from the GLA in response to these revisions will be reported verbally at the meeting. Should Members resolve to grant planning permission the decision will be subject to a Stage 2 referral to the GLA.

Any further responses to consultations will also be reported verbally at the meeting.

### **Planning Considerations**

Planning permission was granted in January 2007 for demolition of covered footbridge over Ringers Road and re-development comprising one 10 storey and one 8 storey blocks containing a total of 163 one two and three bedroom flats with 80 car parking spaces secure storage for motorcycles and bicycles associated landscaping and amenity space and alteration to vehicular access to/from Ravensbourne Road (ref. 06/01528).

Planning permission was granted in January 2008 for demolition of covered footbridge over Ringers Road and re-development comprising one 10 storey and one 8 storey blocks comprising 160 one two and three bedroom flats with 83 car parking spaces and motorcycle/ bicycle parking and refuse storage (amendments to scheme permitted under ref. 06/01528 for 163 flats) (ref. 07/03632). This permission has been commenced.

### **Planning Considerations**

The proposal falls to be considered primarily with regard to the following policies:

#### UDP

- T1 Transport Demand
- T2 Assessment of Transport Effects
- T3 Parking
- T5 Access for People with Restricted Mobility
- T7 Cyclists
- T18 Road Safety
- H1 Housing Supply
- H2 Affordable Housing
- H7 Housing Density and Design
- BE1 Design of New Development
- BE2 Mixed Use Developments
- BE17 High Buildings
- S9 Food and Drink Premises
- ER9 Ventilation
- IMP1 Planning Obligations

#### London Plan

- 2.6 Outer London: Vision and Strategy
- 2.7 Outer London Economy
- 2.8 Outer London: Transport
- 2.15 Town centres
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Children and young peoples play and informal recreation facilities
- 3.7 Large residential developments
- 3.8 Housing choice



- 3.9 Mixed and balanced communities
- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 4.6 Support for and enhancement of arts, culture, sport and entertainment provision
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.5 Decentralised energy networks
- 5.6 Decentralised energy and development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.1 Building London's neighbourhoods and communities
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Location and design of tall and large buildings
- 7.8 Heritage assets and archaeology
- 7.14 Improving air quality
- 7.15 Reducing noise and enhancing soundscapes
- 8.2 Planning Obligations.
- 8.3 Community Infrastructure Levy.

The site is part of Opportunity Site G within the Bromley Town Centre Area Action Plan and Policy OSG states that

'The Council will work with land owners and developers to promote the comprehensive mixed use development of land to the west of the High Street...Detailed development will be on the basis of a Master Plan to be prepared and adopted by the Council. The Master Plan will determine the location, mix and amount of development. The targets for development are:

- Approximately 20,000 sq m (gross) additional retail floorspace including a new department store
- Approximately 5,000 sq m (gross) additional food and beverage floorspace
- Around 1180 residential units, including provision of family housing
- Up to 2,000 sq m additional community and health facilities and reprovision of facilities for faith uses

- Around 600 residential car parking spaces
- 600 public car parking spaces.

...The development will be required to incorporate public realm improvements and to be integrated with the proposals for a new town square and enhanced cultural quarter on Site N.

Development will be required to enhance the setting of the Churchill Theatre and Library building as well as the entrance to Church House and Library Gardens and to minimise any impact on the character of the parkland and Conservation Area. In order to achieve the objectives for town centre renewal, it will be necessary to demolish existing properties. Where buildings do not contribute positively to the character or appearance of the Conservation Area, demolition may be acceptable providing they form part of a comprehensive development and are replaced with high quality buildings that enhance the character of the area.

Taller buildings may be acceptable in the locations identified on the key diagram subject to an appropriate assessment in accordance with Policy BTC19.'

The supporting text at Section 5.7 states that:

'This site on the western side of the High Street offers the first real opportunity for a major commercial development to occur in the town centre since the opening of The Glades in 1991. By developing the site comprehensively the Council's aim is to deliver renewal of the lower part of the High Street and to create an attractive extension to the primary shopping frontage. In commercial terms it will provide modern retailing units more suited to the retailing industry and improve customer choice by accommodating the necessary planned growth of the town centre. The Council wish to encourage the provision of a new department store and the comprehensive mixed use retail led development will also include residential, office, faith and health facilities. Development of the western side of the High Street will improve the appearance of the town centre.

Development of Site G is central to achieving the vision for Bromley Town Centre as an attractive, vibrant living town that meets the needs of residents, businesses and visitors. In order to secure a new department store, it is accepted that there is a need for the development to contain other uses that create value, notably residential. The residential uses will facilitate development of the new retail floorspace and contribute to the creation of a more active and vibrant town centre.

Development will be required to create a sensitive active frontage to the High Street and Church House and Library Gardens and linkages/integration with the parkland and the proposals to create a new town square and enhanced cultural quarter around the Churchill Theatre and Library. The site offers the potential for taller buildings subject to environmental and design considerations.

The development will be phased and a variety of high quality architectural design will be required. The Council will encourage the use of different architects for different phases of development. It will, however, be important to ensure that each phase integrates well with not only each other but with the town as a whole in terms of design, character and materials used.

The retail uses at ground level will create activity and interest and by using the upper floors for residential purposes it will help to not only bring people back into the town centre in the evening but also help meet current housing requirements and create a safe and secure environment.

The development will include the appropriate level of affordable housing in accordance with policy and will also be required to minimise impacts on the remaining nearby existing residential properties. Development will step down to the western side of the site to integrate with the existing residential area. A new residential street is proposed along the western boundary of the site and a number of short and long term highway improvements will be required.'

Appendix 5 of the AAP sets out some Key Design Principles for Opportunity Site G including the following:

'Development should provide permeability and create a sensitive but active frontage onto Church House Gardens and present an imaginative high quality design both to the new public space, the gardens and to the High Street. There should be no unsightly 'rear elevation.

Creation of a secondary street parallel to the High Street fronted by cafes, restaurants and bars and that connects directly into the new public space adjacent the Church House Gardens would help connect the town centre to the park and could also help create a leisure focus in this area.'

Policy BTC 30 of the AAP, including Table 6.1, sets out a policy on the Phasing of Development in Site G. It seeks a retail-led, comprehensive, development.

The following Supplementary Planning Documents (SPD) produced by the Council are relevant:

- Affordable Housing SPD
- Planning Obligations SPD.

The following documents produced by the Mayor of London are relevant:

- The Mayor's Economic Development Strategy
- Housing Supplementary Planning Guidance
- Providing for Children and Young People's Play and Informal Recreation Supplementary Planning Guidance (SPG)
- Housing Strategy
- Accessible London: achieving an inclusive environment
- The Mayor's Transport Strategy

- Mayor's Climate Change Mitigation and Energy Strategy
- Sustainable Design and Construction SPG.

The applicant has indicated a willingness to make a financial contribution of £219,040 to be secured through a Section 106 legal agreement as this was the amount secured through the previous planning permission. The monies were previously allocated as follows:

- £50,000 for town centre improvement works
- £50,000 for the implementation of a 20 mile an hour zone on Ravensbourne Road and Ringers Road to address safety concerns resulting from the proposed access road
- £119,040 for local healthcare infrastructure.

The Council has since adopted the Planning Obligations SPD and the following contributions would be sought in order to comply with policy requirements:

- £321,500.58 for local education infrastructure
- £134,056.00 for local healthcare infrastructure.

The applicant has submitted a Financial Viability Assessment which has been independently verified. The applicant has demonstrated that they could not support additional financial contributions alongside the affordable housing provision.

Policy 8.2 of the London Plan states that:

'Development proposals should address strategic as well as local policies in planning obligations.

Affordable housing; supporting the funding of Crossrail where this is appropriate; and other public transport improvements should be given the highest importance.'

In view of the priority attached to affordable housing and given that the applicant has demonstrated that the required contributions are unviable the shortfall in financial contributions can be accepted.

The following could be secured through a Section 106 legal agreement:

- £219,040 financial contribution as detailed above (this sum could be reallocated according to the Council's priorities)
- affordable housing provision
- recovery of loss of income from the removal of pay and display car parking bays.

As part of the application process, it was necessary for the Council to give Screening Opinions as to whether an Environmental Impact Assessment was required. The proposal constitutes Schedule 2 development within the meaning of

the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011. After taking into account the selection criteria in Schedule 3 of the Regulations and the terms of the European Directive, it was considered that the proposed developments would not be likely to have significant effects on the environment by virtue of factors such as their nature, size and location. This opinion was expressed taking into account all relevant factors including the information submitted with the applications, advice from technical consultees, the scale/characteristics of the existing and proposed development on the site. The applicants have been advised accordingly.

The proposal equates to a residential density of 329 dwellings per hectare and 884 habitable rooms per hectare.

## **Conclusions**

A significant material consideration in assessing the proposal is the existing, commenced planning permission. The acceptability of an 8 and a 10 storey building similar in design to the current proposal has previously been established. However, since planning permission was granted for the previous scheme the Bromley Town Centre AAP was adopted in October 2010. The site lies within Opportunity Site G and the proposal should be assessed against the current policy framework which includes aspirations and objectives for Site G.

The main issues to be considered in this case are as follows:

- impact of the additional storey of development on each block on the character of the area and the residential amenities of the occupants of nearby residential dwellings
- whether the proposal is in accordance with the aspirations, objectives and policies of the Bromley Town Centre AAP.

Policy OSG states that the Council will prepare a detailed Master Plan which will determine the location, mix and amount of development. The AAP anticipates that development of Site G will be phased but that it will be important to ensure that each phase integrates well with not only each other but with the town as a whole in terms of design, character and materials used. One of the Key Design Principles identified within the AAP is the creation of a secondary street running parallel to the High Street which would form a spine linking the different phases of development within the site. Achieving permeability is also a key principle for site redevelopment so as to deliver new and improved pedestrian connections. Policy OSG requires that a comprehensive approach to development is pursued.

The Council is currently in the process of appointing a development partner for the redevelopment of Opportunity Site G.

Whilst a Master Plan is not yet in place the Key Design Principles of the AAP emphasise the importance of permeability and detail the aspiration for a secondary street running parallel to the High Street. The proposal seeks to address these requirements with the introduction of a pedestrian route through the site. However, this route involves steps and its design and location may not accord with the

Council's aspiration for a street running parallel to the High Street. The proposal is therefore not considered to achieve the level of integration with the remainder of Site G and the town centre envisaged by the AAP in terms of its design and character.

Policy OSG sets development targets for 20,000 sq m (gross) retail and 5,000 sq m (gross) food and beverage floorspace. The applicant has proposed a 460 sq m commercial unit for Class A3/A4 use. However, a large proportion of the footprint will be given over to residential use which will compromise the Council's ability to meet the targets for new retail and food and beverage floorspace on Opportunity Site G.

Policy BTC 30 of the AAP, including Table 6.1, sets out the approach to Phasing. The phasing schedule, under the heading Delivery Strategy, refers to a retail-led comprehensive development of Site G as being key to High Street regeneration. There is a need for site assembly and the Table 6.1 schedule notes that a smaller scale scheme would yield fewer benefits for the Town Centre as a whole. The Proposed development is such a smaller scale scheme in advance of a retail led comprehensive scheme and its phasing is not in accordance with Policy BTC 30.

The revised scheme involves higher buildings than previously approved. The surrounding area includes more modest development including blocks of flats on Ringers Road and two storey houses and blocks of flats on Ravensbourne Road and Ethelbert Road. It should be noted that Ringers Road slopes downwards towards Ravensbourne Road and the blocks will appear particularly dominant and overbearing when viewed from properties situated on a lower ground level, in particular those on Ravensbourne Road. The blocks will also be visible from the High Street forming a significant component of the townscape and the additional height will increase their impact. It is therefore considered that the additional height and bulk of the blocks compared to the previously approved scheme will result in a more prominent development which will appear dominant and overbearing, harmful to the character of the area and residential amenities of the occupants of nearby residential dwellings.

The GLA have raised concerns regarding the elevations of the blocks. However, the design does not differ significantly from the previously approved scheme and there has not been a shift in policy such that the layout and elevational treatment of the blocks could now be considered unacceptable. The GLA have raised other concerns regarding matters including housing, inclusive design and climate change. These matters are not considered to represent grounds for refusal of planning permission and if Members were minded to grant planning permission the decision would be referable to the GLA.

The scheme is considered an improvement over the previously approved development in terms of providing larger flats, a degree of permeability and the introduction of a commercial unit at ground floor level. However, these changes are not considered sufficient to comply with the APP which has been adopted since the previous application was determined and the scheme will also result in harm resulting from the additional height. Whilst taking into account the commenced scheme, the proposal is on balance considered unacceptable.

## **RECOMMENDATION: PERMISSION BE REFUSED**

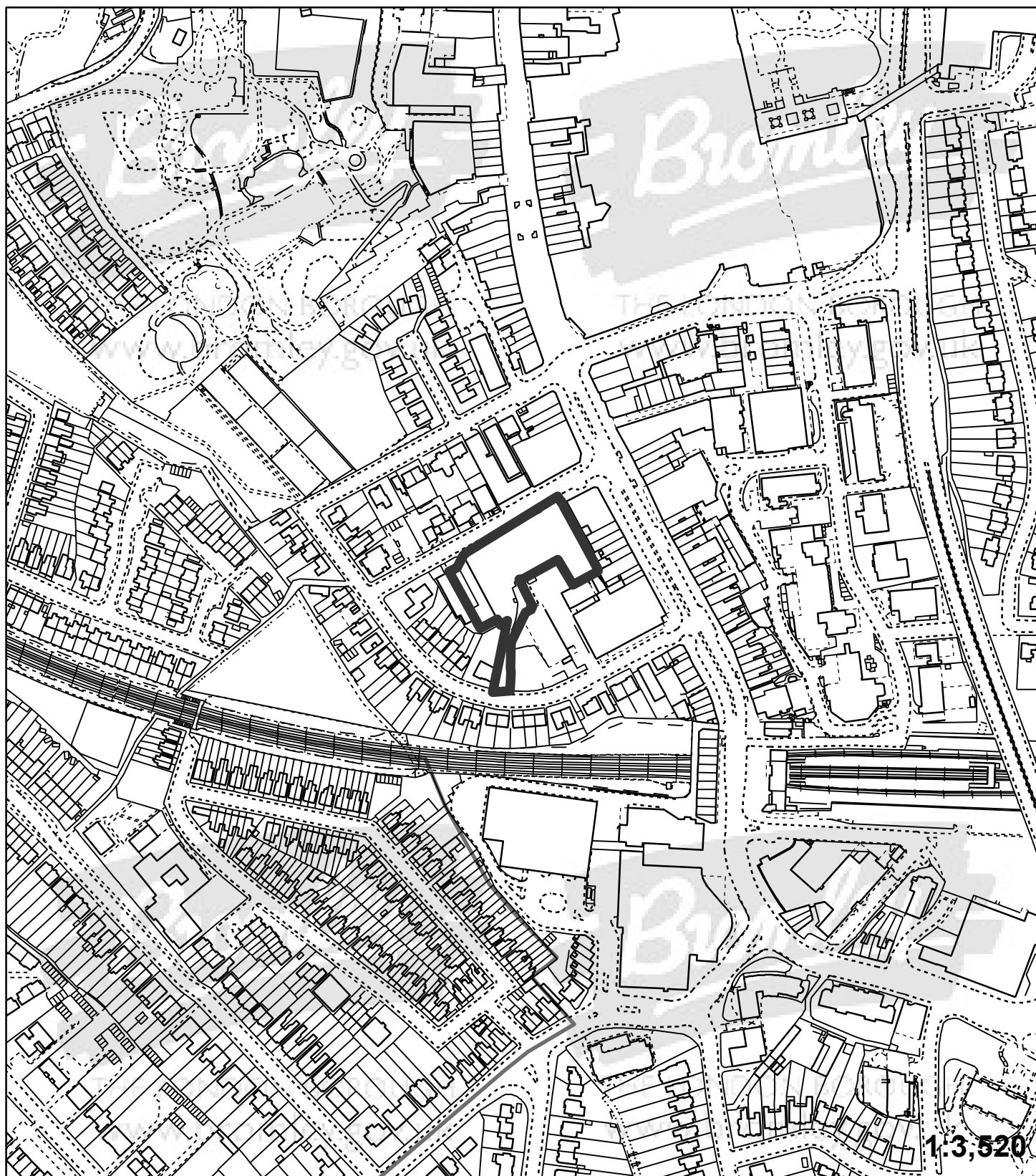
The reasons for refusal are:

- 1 The proposed development would conflict with the Area Action Plan objectives for Opportunity Site G, particularly in terms of the delivery of retail floorspace, permeability, the phasing of comprehensive development and the creation of a secondary street through the site, and is thereby contrary to Policy OSG and Policy BTC 30 of the Bromley Town Centre Area Action Plan.
- 2 The proposed development, by reason of the excessive height and bulk of the blocks, would be unduly harmful to the character and appearance of the area and appear dominant and overbearing when viewed from nearby residential properties contrary to Policy BE1 of the Unitary Development Plan.

**Application:**12/03088/FULL1

**Address:** Land At South Side Of Ringers Road Bromley

**Proposal:** Erection of 1x11 storey (plus upper basement) and 1x9 storey (plus lower and upper basement) building comprising 148 flats (48x1 bedroom and 100x2 bedroom), 460sqm commercial unit (Class A3/A4), 77 car parking spaces, cycle parking, refuse and recycling stores, ancillary



"This plan is provided to identify the location of the site and should not be used to identify the extent of the application site"

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