

Gemma Usher
Bromley Council
Town Planning
Civic Centre
Stockwell Close
BROMLEY BR1 3UH

Our ref: D&P/3633/NG
Your ref: DC/15/00701/FULL1
Date: 20 May 2015



Dear Ms. Usher,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

Footzie Social Club, Social Approach, Lower Sydenham, London SE26 5BQ
Local planning authority reference: DC/15/00701/FULL1

I refer to the copy of the above planning application, which was received from you on 13 April 2015. On 20 May 2015 the Mayor considered a report on this proposal, reference D&P/3633/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor cannot support the principle of inappropriate development in the Metropolitan Green Belt as very special circumstances do not exist to outweigh the harm caused. The Mayor also has significant concerns with the design, layout, height and mass of the building proposed. In order to ensure full compliance with the London Plan, the issues set out in paragraph 103 of this report should be addressed before the scheme is referred back to the Mayor at stage two.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, e-mail GavinMcLaughlin@tfl.gov.uk, telephone 020 7027 9086.

Yours sincerely,



My **Colin Wilson**

Senior Manager– Development & Projects

cc Assembly Member, James Cleverly, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL

Footzie Social club, Station Approach, Lower Sydenham, SE26 5BQ

in the London Borough of Bromley

planning application no. DC/15/00701/FULL1

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and redevelopment comprising the erection of a part 8/9/10/11/12 storey building plus basement comprising 296 residential units (148 x one bed, 135 x two bed and 13 x three bed), together with the construction of an estate road, 222 car parking spaces, 488 cycle parking spaces and landscaping of the east part of the site to form an open space accessible to the public.

The applicant

The applicant is **Relta Ltd** and the architect is **Ian Ritchie Architects**.

Strategic issues

The proposals are **inappropriate development** on **Metropolitan Open Land** and **very special circumstances** have not been demonstrated to outweigh the harm caused to the open quality and permanence of the MOL. The site was also last used as a **playing field**, and further justification is required on the loss of the site for this purpose.

The **layout, height, mass, and density** will be harmful to the open character and quality of the MOL, and further work is also required on the ground floor layout to ensure street level activity and a good quality public realm.

The indicative position on **affordable housing** is acceptable at this stage although further information is required on the **unit mix** across tenures and the location of the affordable units. Matters of **flooding** and **children's playspace** are acceptable subject to conditions.

Further information is required on matters of **inclusive access, energy and transport** and a number of conditions are required.

Recommendation

That Bromley Council be advised that the application does not fully comply with the London Plan for the reasons set out in paragraph 95 of this report, which should be addressed before the application is referred back to the Mayor.

Context

1 On 13 April 2015 the Mayor of London received documents from Bromley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 22 May 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A and 3D of the Schedule to the Order 2008:

Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".

Category 3D: "Development on land allocated as Green Belt or Metropolitan Open Land...which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building."

3 Once Bromley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is triangular in shape and comprises an area of 18,649 sq.m currently occupied by a large area of open space and an area of hardstanding used for parking and storage with a few small scale buildings. It is bound to the west by the Hayes to London Charing Cross railway line with Lower Sydenham Station a short distance further north, with an industrial estate beyond the railways lines to the west. To the south and east the site adjoins further open space used as playing fields, and to the north it adjoins another warehouse and a recently implemented flatted development (by the same applicant and architect) on the wider site of the former Dylon International premises (forming phase one). It is understood that the current site historically provided open space and recreation for employees of Dylon International.

6 The site is accessed via a single lane private road off Station Approach and Worsley Bridge Road that runs parallel with the railways lines and adjacent to the phase 1 site. There is a narrow track leading to the southern part of the site. The topography of the site falls gently from the north to the southern corner and from west to east towards the Pool River.

7 The site is designated as Metropolitan Open Land (MOL) in Bromley Council's Unitary Development Plan (UDP) and forms part of a Green Chain. The Pool River runs along the south-east boundary of the site.

8 The nearest part of the Transport for London Road Network (TLRN) is London Road A205 approximately 1500 metres to the north. The nearest part of the Strategic Road Network (SRN) is Crystal Palace Road A234 approximately 750 metres to the south.

9 A bus stop 356 metres east of the site on Worsley Bridge Road is served by the 352 service, enabling journeys to Beckenham and Bromley town centres. Lower Sydenham national rail station is approximately 200 metres north of the site, providing access to London Cannon Street, London Bridge, Waterloo East and London Charing Cross stations. The application is Phase 2 of a wider scheme and the Public Transport Accessibility Level (PTAL) is 2 (on a scale of 1 – 6 where 6 is classifiable as ‘excellent’).

Site history

10 The site was historically associated with the site to the north, for which planning permission was granted in 2010 and has now been implemented. This development comprised the erection of a part 5/6/7/8 storey building plus basement to provide 149 residential units, B1 office accommodation (6,884 sq.m), A1 retail space (449 sq.m), A3 cafe/restaurant (135 sq.m) and D1 creche (437 sq.m) with car parking and landscaped open space. It was allowed on appeal following the Council’s decision to refuse permission on grounds of its impact on character and the openness of the Metropolitan Open Land.

Details of the proposal

11 The application proposes the demolition of existing building and redevelopment of the site involving the erection of a part eight, part 9/10/11/12 storey building with basement comprising 296 residential flats (148 x one beds, 135 x two beds and 13 x three beds).

12 The building is positioned along the western boundary close to the railway line on the area that is currently hard surfaced, with the eastern part of the site left for landscaping which the applicant states will be made publicly accessible.

13 Access will be via the existing track that runs adjacent to the railway line from Station Approach, with egress via the new access road development as part of phase one providing access onto Worsley Bridge Road.

14 A total of 222 car parking spaces will be provided both alongside the access road (97 spaces including 10 blue badge) and in a basement (125 spaces including 14 blue badge and motorcycle spaces). Cycle parking will also be provided in the basement.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Land use principles *London Plan;*
- Metropolitan Open Land *London Plan;*
- Housing *London Plan; Housing SPG; Draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Affordable housing *London Plan; Housing SPG, Draft Interim Housing SPG;*
- Density *London Plan; Housing SPG; Draft Interim Housing SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context Draft SPG;*
- Inclusive access *London Plan; Mayor’s Accessible London SPG;*
- Flooding *London Plan;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change and Energy Strategy; Mayor’s Water Strategy;*

- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy.*

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are; the 'saved' policies of Bromley Council's Unitary Development Plan, originally adopted on 20 July 2006 with the majority of policies saved in 2009, and; the London Plan (Consolidated with Alterations since 2011).

17 The following are also relevant material considerations:

- Bromley Council's Draft Policies and Designations Local Plan (consultation closed March 2014);
- Minor Alterations to the London Plan;
- The National Planning Policy Framework and National Planning Policy Guidance.

Land use principles - Metropolitan Open Land

18 As stated in paragraph seven, the site is designated as Metropolitan Open Land. Policy 7.17 of the London Plan confirms that the strongest protection should be given to London's Metropolitan Open Land in accordance with national guidance, and inappropriate development should be refused except in very special circumstances, giving the same level of protection as in the Green Belt.

19 The relevant national guidance on Green Belts is set out in paragraphs 79-92 of the NPPF and this applies equally to Metropolitan Open Land. The construction of new buildings in MOL is inappropriate development, although NPPF paragraphs 89-90 identify circumstances where new buildings are not inappropriate, including for example buildings for agriculture/forestry, facilities for outdoor sport/recreation and small extensions or replacements of existing buildings. London Plan Policy 7.17 echoes this approach and states that appropriate development will be limited to small scale structures to support outdoor open space uses. The application proposals are, therefore, inappropriate development which is harmful to MOL. As set out in NPPF paragraphs 87-88, very special circumstances (VSC) need to exist to outweigh the harm caused.

20 The applicant has put forward a number of reasons to justify the development on MOL comprising its VSC case.

The nature of the designation and contribution it makes

21 In its planning statement, the applicant retrospectively applies the policy tests of London Plan Policy 7.17 used when considering whether to designate land as MOL in the preparation of a Local Plan. The applicant asserts that when considering a proposal for development on MOL, it is appropriate to undertake an assessment to establish whether or not the land meets these tests. What follows is the applicant's assertion that the land does not meet the MOL designation tests in Policy 7.17 because part of the site contains structures and hardstanding, there is no public access to it and it does not contain any landscape features of national or metropolitan value. While it forms part of a Green Chain the applicant asserts that it fails to meet at least one of the preceding tests and so fails the last test.

22 The planning application process is not the process through which to challenge the designation of MOL. If the applicant considers that the land should not be designated as MOL, it would need to submit representations to the Council's consultation on the preparation of the draft Local Plan (which is currently underway) so MOL boundaries can be considered strategically by the Council and the Mayor.

23 Notwithstanding the above, it is the GLA officer's view that the site does meet the necessary criteria in Policy 7.17 for designating MOL. The land does contribute to the physical structure of the area and is clearly distinguishable from the built up area, as it is part of and connects with a wider network of open space, which is clearly visible in long range and shorter views (from Addington Hills for example and from the railway). It also forms part of a designated Green Chain and includes open air facilities that formerly were used for sport and recreation which could serve a significant part of London if public access were allowed.

Improved landscape and public access

24 The applicant has highlighted the benefits of the scheme to the MOL, principally by opening up the site to public access, retaining and enhancing the open space and landscape features on the eastern side, and enhancing biodiversity. The conditional state of the site is also referred to, although it is noted that there are a number of enforcement cases currently pending for unauthorised uses.

25 As noted in Policy 7.17 the Mayor is keen to see improvements in the quality and accessibility of MOL and Green Chains, and these benefits are therefore supported and welcomed. Arguably, they could be achieved without the scale of inappropriate development proposed and would in most cases be a policy requirement of any development. These improvements therefore, despite welcomed, cannot be fully accepted as very special circumstances.

Housing need

26 The applicant references London's desperate and ever increasing need for new housing and highlights the new housing targets in the 2015 London Plan to address this. It is stated that in Bromley the target of 641 dwellings per annum (dpa) is a 28% increase over the earlier target. It is also highlighted that the 2015 London Plan places an expectation on Council's to identify extra housing capacity to close the gap between housing need and supply, with the 5% buffer increasing this target to 673 dpa (NPPF paragraph 47). The applicant asserts that in Bromley, there are fewer opportunities to bring forward large high density developments, and without sites such as this it will not be possible to meet, let alone exceed, the new targets. It is not clear where this claim comes from and it is not substantiated. The applicant further claims that based on its own study of potential alternative sites, there is doubt over whether there is sufficient land available to meet the new target plus the 5% buffer, without this site being developed. Again there is no further evidence to substantiate this claim.

27 It should be noted that the London Plan housing targets are based on a Strategic Housing Land Availability Assessment (SHLAA) which was tested and endorsed at Examination in Public. A key principle of the SHLAA and London Plan is that the target can be met without the need to consider designated open space.

28 Bromley Council has in previous years been able to demonstrate a five year housing supply in its Annual Monitoring Reports, and indeed has reported annual completions above the target. Whilst it is noted that the recent publication of the London Plan (2015) increases the annual target and sets an expectation on Council's to identify extra capacity, the Council is currently updating its five year housing trajectory which it is planning to report to committee this summer. The indicative position is that it can meet the target without the need to consider sites in the Green Belt or MOL.

Precedent examples

29 The applicant quotes a number of example cases, both granted by the Council and allowed on appeal for housing development on Green Belt and MOL over the past eight years. The circumstances and merits of each case are irrelevant to the consideration of this planning application and is not, therefore, an argument of very special circumstances.

Conclusion on VSC

30 The applicant has put forward a number of factors to justify inappropriate development on MOL. Whilst the improvement to the landscape and provision of public access is welcomed, by itself it is not a very special circumstance. Housing need could be a valid VSC argument in some cases, but at this stage GLA officers are assured that the Council is, and will continue to be able to, meet its housing target over the next five years. Very special circumstances do not exist therefore, to outweigh the harm caused by the inappropriate development on MOL.

Impact on openness

31 NPPF paragraph 79 makes it clear that the essential characteristic of Green Belt/MOL is its openness and permanence. Whether or not very special circumstances exist to outweigh the harm caused by inappropriate development on MOL, it is also necessary to consider the impact on the openness and character of the MOL.

32 This is discussed in greater detail in paragraphs 51-57 of this report in the urban design section. However, the overall conclusion is that the scale, height and mass of the building would be harmful to the openness of the MOL, notwithstanding the contained positioning of the buildings footprint along the western edge.

Playing fields

33 Paragraph 74 of the NPPF sets out that existing open space, sports and recreation land should not be built on except in certain prescribed circumstances. These include: evidence that the land is surplus to requirements, a replacement would be secured in a suitable location, or the proposal is for alternative sport/recreation use which outweighs the loss.

34 While it would appear that through neglect and various unauthorised activities, the land has not been used as a playing field for some time, it is understood that it historically provided a sport and recreation facility for employees of Dylon International. The applicant is required to demonstrate therefore how the proposed development meets the exceptions outlined in the NPPF, to justify that the loss of this land for sport/recreation purposes is acceptable.

Housing

35 The proposal seeks to provide 296 residential units with the following unit mix:

Unit type	No. of units	% of units
1 bed flat	148	50%
2 bed flat	135	45.6%
3 bed flat	13	4.4%
TOTAL	296	100%

Table 1: Unit schedule

Affordable housing and tenure

36 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units, taking into account; the need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and; the specific circumstances of individual sites. The tenure split suggested by the London Plan is 60% social/affordable rent and 40% shared ownership. The NPPF, the Mayor's Housing SPG and the London Plan clearly state that to maximise affordable housing in London and provide a more diverse offer for the range of people requiring an affordable home, the affordable rent product should be utilised in the affordable housing offer in residential developments.

37 Bromley Council's current 'saved' policy in the UDP on affordable housing requires all residential developments to provide 35% affordable housing with a tenure split of 70% social rent to 30% intermediate, unless it can be demonstrated (through viability or the aim for mixed communities, for example) that a lower level or different tenure split is appropriate.

38 In the planning statement, the applicant states that 35% of the units will be provided as affordable units, with a tenure split of 60% social rent and 40% intermediate, the preferred tenure split in the London Plan. The offer at this stage therefore meets the policy requirement in Bromley's UDP. The site however, is a greenfield, windfall site which could not have been purchased on the basis of its development potential. In addition, the London Plan policy as outlined above, is for the maximum reasonable amount of affordable housing to be delivered and is a far more up-to-date policy than Bromley Council's UDP policy. On that basis therefore, GLA officers require the applicant to conduct a financial viability appraisal to demonstrate the maximum reasonable amount of affordable housing will be delivered, based on the development's viability. This should be based on the existing use value (EUV) of the site (open space) or a suitable benchmark land value (of comparable open space transactions).

39 The Council and/or its independent consultant should scrutinise the toolkit appraisals to determine whether the maximum reasonable amount of affordable housing that the development can deliver is being secured. GLA officers will require both reports to be submitted prior to the application being referred back at stage two.

40 The affordable housing offer, tenure split, and type of products proposed, should aim to meet both local and strategic needs, whilst also maximising the overall provision. As noted in paragraph 36, in order to maximise affordable housing delivery and provide a more diverse offer for those requiring an affordable home, the affordable rent product should be utilised. In Bromley

where values are more affordable than central London, the affordable rent product can maximise the affordable quantum without necessarily impacting on the affordability of the units for local people. GLA officers therefore strongly urge the applicant to consider affordable rent as a product, whilst ensuring that the final offer, tenures and unit mix proposed meets both local and strategic housing needs. The financial viability assessment should therefore include a policy compliant scenario test, with affordable rent to indicate whether there would be a difference in affordable quantum, as well as details of how rent levels inputted into the toolkit have been established.

41 GLA officers welcome further information on the applicant's timescales for delivery. If, due to phasing, the units will not be delivered in the short term, GLA officers would welcome the inclusion of a review mechanism in the section 106 agreement, requiring the developments finances to be re-tested at a later stage to allow any additional financial surplus to be captured prior to implementation/between phases, that may be generated by an uplift in sales values. Such a mechanism would need to be designed so as to ensure an appropriate proportion of any financial surplus would be awarded to the Council, and ring-fenced for the delivery of additional affordable housing units.

Mixed and balanced communities

42 London Plan Policies 3.8, 3.9 and 3.11 and the Mayor's Housing SPG all accord priority to affordable family housing in new residential development, promote housing choice and seek a balanced mix of unit sizes and tenures in new developments in order to promote mixed and balanced communities, which can be achieved by providing a mix of tenures across the development and ensuring that the scheme is tenure blind.

43 No information is provided in the application documents on the breakdown of unit types and sizes between the tenures, or where the affordable units will be located. To ensure a mixed and balanced community, the affordable units should be spread as far as practicable across the development and there should be no design differences between the tenures. Further information is required on this matter.

44 The development includes 13 family sized units (those with three or more bedrooms), representing 4.4% of the total development. This is a fairly low proportion of family units. The applicant should increase this proportion, and through discussions with the Council's housing team ensure that a generous proportion of family sized units are allocated for affordable tenants. Further information is required on this matter.

Residential quality

45 London Plan policy 3.5, Table 3.3 and Annex One of the Housing SPG set out requirements for the quality and design of housing developments, including minimum space standards for new development. The application documents demonstrate that the minimum floor space and floor-to-ceiling height standards would be met or exceeded, together with compliance with the Lifetime Homes standard, which is welcomed and should be secured by condition.

46 The Mayor's Housing SPG states that new residential development should generally not provide more than eight units per core, in order to promote a sense of community and ownership over one's home. In addition, in order to achieve a quality internal environment in terms of light and cross-ventilation, the SPG states that dual aspect units should be maximised and single aspect units facing north should be avoided altogether.

47 The design and access statement and application drawings demonstrate that generally there will be either three or four units per core and due to the high number of cores, dual aspect units have been maximised with no single aspect north-facing units, which is commended. Generally

unit sizes meet or exceed the Mayor's draft housing standard in the recently published Minor Alterations to the London Plan (MALP) consultation, although there are a few slightly undersized units on each floor, which will need to be addressed.

48 Private amenity space will be provided for each dwelling by way of balconies or private patio areas, and due to the site's MOL setting, residents would also benefit from extensive open space for recreation and amenity.

Density

49 London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the density matrix in support of this policy. Based on the characteristics of the location set out in paragraphs 5-9, the site can be regarded as having a 'suburban' setting as it is predominantly characterised by low-rise housing development and low density industrial areas with open space.

50 For a 'suburban' setting with a medium PTAL rating, the matrix suggests a residential density in the region of 150-250 habitable rooms per hectare, and for an 'urban' setting, 200-450 habitable rooms per hectare.

51 The application documents confirm that the scheme has a density of 159 units per hectare or 404 habitable rooms per hectare. It therefore falls outside of the 'suburban' range but within the 'urban' range.

52 While the policy seeks to optimise housing output and realise the optimum potential of sites, it also acknowledges that the density matrix should not be applied mechanistically, as other factors such as the surrounding context, layout and residential quality will also inform the appropriate density range. As noted earlier, the site is in MOL where any development must be designed to maintain openness. In this instance and in the context of the comments made at paragraph 51-57 on urban design, the development's density is not appropriate to the MOL setting and adds to the argument that the impact on the open character is too great.

Children's play space

53 Children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.

54 Applying the methodology within the Mayor's Play and Informal Recreation SPG (2012), and based on the unit types and tenures set out in table one, the development will generate a child yield of 20 children requiring approximately 197 sq.m of playspace. This figure is based on a wholly private scheme as there is no detailed information at this stage on the unit mix across tenures, so will need to be updated when the application is referred back at stage two. Nonetheless, given the site's location in MOL and the extensive open space that will remain on site, there is sufficient scope to ensure that on-site playspace is provided. The applicant should however provide an indicative playspace strategy before the application is referred back at stage two, which should be secured by condition by the Council.

Urban design

55 The main strategic issue in urban design terms is the visual impact the proposals will have on the open quality of the surrounding MOL. As noted earlier in this report, London Plan Policy 7.17 sets out that except in a few cases, development in the MOL is inappropriate and harmful and only in very special circumstance can that harm be outweighed by other benefits. The Policy and the NPPF also make it clear that in all cases, built form must be designed so as to minimise its visual impact on the open quality.

56 On the basis of this policy context, significant concerns are raised with regards to the scale and bulk of the building, and the development's ability to enhance the spatial relationship with the MOL.

57 It is accepted that the quality of the MOL along the western boundary particularly has less value, but as noted elsewhere in this report it would appear that this is due to unauthorised activity and neglect. In addition, whilst the Inspector granting the permission for Phase 1 described that site as being relatively secluded in nature and land locked by the industrial land and adjoining street network, the layout and massing of that scheme aligns with the surrounding street edges, mediating in scale with the neighbouring industrial units and residential properties. The application site however is less secluded, more open in nature and more prominent in views further to the east/south-east.

58 The proposal seeks to continue the building line and draw on the scale of the western portion of Phase 1, introducing a linear building form, gradually stepping up in height from eight to twelve storeys along the edge of the railway. This results in a visually prominent wall of development when viewed from the main expanse of MOL to the south-east of the site. This would significantly alter the quality of openness and would create substantial overshadowing of the MOL, limiting the usability of the open space particularly during late afternoon/evening in the summer months. While there may be a case to be made for introducing some enclosure between the railway line and MOL to enhance the quality of the space, the scale and bulk of the proposed building goes beyond what could be recognised as being necessary or acceptable to achieve this. It would also almost entirely block the views of the MOL from the railway line, a characteristic which connects the MOL with the wider urban area.

59 Similarly, the ground floor treatment along the eastern edge of the block raises concern as it effectively presents a blank and continuous, inactive retaining wall, limiting the relationship with, and views of, the MOL to the east/south-east.

60 In addition, the western edge is likely to be dominated by the required vehicular/serving access arrangements and offers little to ensure a high quality public realm. While it is acknowledged that the scheme is designed to address level changes and flood mitigation across the site, the ramped entry points to cores means that there is limited street-based activity (supported by passive surveillance) which is likely to result in under-used areas of public realm, which are in turn dominated by car parking. The extent of plant room frontage along the northern edge of the block raises similar concern.

61 As detailed above, in the context of the MOL, the form and massing strategy raises concern and cannot be supported in terms of London Plan Policy 7.17 in its current form. The applicant should revisit the form and massing approach in parallel with testing the proposal in key views from the west of the site in particular and any future proposals should include a clear demonstration as to how the scale and bulk of development is designed to respond to the need to maintain the open quality of MOL.

Inclusive design

62 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

Residential units

63 The design and access statement demonstrates how the development responds to the principles of inclusive design, and typical floor plans showing how the design of the residential units meets the sixteen Lifetime Home standards have been included. The planning statement confirms that 10% of the units will be wheelchair accessible although the floor plans do not show where these units will be located and typical floorplans of the wheelchair have not been included. Further information is required on this matter.

Marketing

64 The future marketing of the private wheelchair accessible homes should ensure that prospective purchasers are aware of the accessibility and adaptability of these units. Specific marketing to the disabled community and to older people's organisations can help to ensure that the people who will benefit from their accessible design are made aware of their existence.

Public realm

65 Extending the Lifetime Homes concept to the public realm can help to ensure that the parking areas, the routes to the site and links to adjacent public transport and local services and facilities are also designed to be accessible, safe and convenient for everyone, particularly disabled and older people.

66 Whilst the design and access statement includes details showing how disabled people access each of the entrances safely, there is a lack of information on of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc, and how any level changes on the routes will be addressed. There is also a lack of detail on how wheelchair users would access the site safely and conveniently given its tucked away position down a private road. The access to the podium deck from the open space is also limited to a number of staircases which would fail to meet the objectives and inclusive access principles of London Plan 7.2. Further information is required on these matters before the application is referred back at stage two.

Parking

67 The application documents confirm that 24 of the spaces will be accessible, in accordance with London Plan Policy 7.2 requiring one wheelchair parking space for each wheelchair accessible unit to be provided in the development. The applicant is required to indicate which spaces will be designed to be accessible and include a plan showing the location of these spaces to ensure travel distances have been minimised to the corresponding wheelchair units.

68 The provision and future management of the blue badge parking bays for the residents should be in line with the advice in the Lifetime Homes standards and the Wheelchair Housing Design Guide. A parking management plan should identify how bays will be allocated to residents of the wheelchair accessible units and should include a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and the provision reviewed. This ensures that the provision going forward equates to the demand from disabled residents and visitors, and also ensures that the bays are effectively enforced.

Flooding

Flood risk

69 The site is within Flood Zone 3 and a Flood Risk Assessment has been prepared by RPS which includes detailed flood modelling. This demonstrates that the site is not within Flood Zone 3b and furthermore that the proposed building footprint is generally confined to the 1 in 100 year flood risk with some limited areas at risk of a 1 in 50 year flood.

70 The proposed development will set its ground floor at 27 metres AOD which is above the range of modelled flood levels, which are stated at a maximum of 25 metres AOD for the 1 in 1000 year event. Therefore the living accommodation and access to the buildings will remain dry in all foreseeable events.

71 The FRA acknowledges that the basement level, which is set at 24 metres AOD will be subject to flooding for events from the 1 in 50 year flood and above. To manage this residual flood risk the FRA states that flood resilient materials will be used up to the maximum flood levels, and that flood proof doors will be used to enclose any vulnerable plant, including the lifts within the basement. In addition a flood warning and evacuation plan will be prepared (it is noted that this appears to be referred to under several different titles). The basement will be designed with appropriate grills to allow the relevant flood waters to enter the basement. This is a deliberate design requirement to enable the basement to act as flood storage and avoid the development increasing the flood risk elsewhere by diverting flood water that would otherwise flow into and pond on this site. Indeed the FRA calculations show that there is an increase in such flood storage that should result in a marginal decrease in flood risk elsewhere.

72 These detailed flood risk management matters have been agreed with the Environment Agency and a range of planning conditions are proposed to secure these measures.

73 Overall this is an appropriate risk based response to the flood risk on site and the development is therefore acceptable in terms of London Plan Policy 5.12, subject to the range of planning conditions proposed.

Surface water run-off

74 The FRA states that the detailed arrangement for drainage from the site will be worked up at a later stage as part of the landscaping proposals. The FRA acknowledges the need to achieve a greenfield rate of run-off from the additional hard surfacing proposed, and to achieve a 50% reduction in run-off from the retained existing impermeable surfaces. The applicant is reminded that a 50% reduction is a minimum, and that given the extent of the landscaped area proposed in this development, there should be considerable opportunity to achieve close to a greenfield run-off rate for the whole development. It is encouraging that the FRA states that preference will be given to soft landscaping SUDS solutions, rather than hard engineered techniques.

75 The FRA states that the roof area will be utilised for PV panels and therefore a green roof is not possible. This conclusion is challenged as it is relatively common to combine green roof and PV panels. This statement also does not correspond with the energy statement where it says that PV panels are not proposed.

76 However, the principles of the surface water management for the site are sound and are likely to comply with London Plan Policy 5.13, subject to the proposed planning condition to resolve and agree the specific measures for the site.

Climate change mitigation and adaptation

Overview of proposals

77 The applicant has broadly followed the energy hierarchy and submitted sufficient information to understand the proposals as a whole. Further revisions and information are required in order to verify the carbon savings claimed and ensure compliance with London Plan Policies.

Energy efficiency standards

78 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by Building Regulations. Other features include low energy lighting and mechanical ventilation heat recovery. The demand for cooling will be minimised through openable windows, efficient lighting and a summer boost function included in the mechanical ventilation.

79 The applicant has used individual gas boilers whilst proposing a centralised system. Although the emissions in the 'be lean' part of the hierarchy need to be updated to include the centralised system with gas boilers only.

80 The development is estimated to achieve a reduction of 27 tonnes per annum (8%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development. Sample SAP worksheets (both DER and TER sheets) for the development including efficiency measures alone should be provided to support the savings claimed.

81 The grid carbon factors reported in the energy assessment are from Part L 2010. The applicant should ensure that the latest emissions figures for Part L 2013 are used for the energy assessment and updated the results where necessary.

District heating

82 The applicant has carried out an investigation and there states that there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

83 The applicant is proposing to install a site heat network, which will be supplied from a single energy centre located in the basement of the development. While this is supported, the applicant should provide information on the heating arrangement for Phase 1 of the development and whether there is capacity for connecting the Phase 2 communal heat network to Phase 1.

Combined Heat and Power

84 The applicant is proposing to install a 70 kWe gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating, and a reduction in regulated carbon dioxide emissions of 226 tonnes per annum (70%) will be achieved through this second part of the energy hierarchy.

85 The carbon emission reduction from the CHP appears to be high for a small engine, and GLA officers require further details of how the savings from CHP have been calculated, such as the total number of operational hours and CHP size in kWth. The applicant should also note that the CHP efficiency used should be the gross value. The SAP DER worksheets should also be provided to support the savings claimed.

86 The applicant should provide information on the management arrangements proposed for the system, including anticipated costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability.

Renewable energy technologies

87 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development.

88 The installation of PV on this development would be welcomed given the extent of roof space and orientation.

Overall carbon savings

89 A reduction of 253 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 72%. While the carbon dioxide savings exceeds the target in London Plan Policy 5.2, further information is required as outlined above to ensure compliance with London Plan energy policies.

Transport for London

Site access

90 Pedestrians would access and egress the site from a private road via Station Approach, adjacent to the main access to Lower Sydenham station. Pedestrians would also be able to access and egress the development from a new access from Phase 1 onto Worsley Bridge Road.

91 Vehicular access would be taken from Station Approach after exiting from the mini-roundabout junction of Station Approach/Worsley Bridge Road/Montana Gardens. However vehicles would egress to Worsley Bridge Road by a junction at the eastern boundary of the Phase 1 site, to the south of the mini-roundabout junction.

92 It is unclear from the Transport Assessment (TA) and application drawings what, if any, provision (e.g. signage, segregated lanes, road markings) would be made for cyclists to access and egress the site. Detailed design of the site access should be required by condition by the Council and approved in consultation with TfL to ensure accordance with TfL's London Cycle Design Standards (LCDS).

Car parking and car club

93 222 residential spaces are proposed at a ratio of 0.75 spaces per unit. This level of provision conforms with the London Plan (consolidated March 2015) and is satisfactory. 20% should be provided with active electric vehicle charging points (EVCPs) and 20% with passive provision in accordance with London Plan Policy 6.13. The parking proposed includes 24 wheelchair accessible spaces at a 1:1 ratio to the number of wheelchair accessible residential units, which is acceptable.

94 Provision of disabled Blue Badge parking spaces and EVCPs should be secured by condition. In addition all residents of the new development should be prevented from applying for local parking permits by use of planning condition or section 106 agreement.

95 TfL supports the provision of two new car club spaces and two years free memberships for residents of the new development in line with London Plan Policies 6.13 and 8.2. This should be referenced in the travel plan and secured in the section 106 agreement.

Cycle parking

96 The amount of cycle parking proposed is 488 spaces, which exceeds the requirements of the London Plan and is therefore welcomed. However, the proposed layout and design for the cycle parking is unclear, and the applicant is advised to consult the LCDS. The layout and design of all cycle parking should be secured by condition to ensure full LCDS and London Plan compliance, and this condition should be discharged in consultation with TfL. Further discussions with TfL on this matter are advisable.

Trip generation/modal split

97 Trip generation figures supplied in the TA are satisfactory. TfL accepts the development trip generation would be unlikely to have a significant impact on the highway and public transport networks.

Bus stop enhancements

98 TfL requests that the nearest bus stop to the site on Worseley Bridge Road is audited against TfL's Accessible Bus Stop design guidance. Following this audit, TfL may request developer funding for step-free access at the bus stop, in which case a site visit meeting between TfL, the applicant and the Council may be required.

Walking/Legible London

99 TfL suggests that a pedestrian environment review survey (PERS) should be carried out and considered by the Council in their determination of the application.

100 There is currently no Legible London signage in the vicinity of the site. TfL suggests that a new sign may be appropriate showing the pedestrian and vehicular access to the development adjacent to the entrance to Lower Sydenham national rail station. TfL may seek a section 106 contribution for new signage at the station and on site. Further discussions with TfL are advisable.

Construction, deliveries and servicing

101 A construction logistics plan (CLP) should be secured by condition in line with London Plan Policy 6.3. This should consider and outline proposed measures to protect cyclists, construction phasing, trips generated, site access arrangements, construction routes, co-ordination with other sites and cumulative impacts of construction traffic. The CLP must follow TfL's best practice guidance available from: <http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans>.

102 A detailed delivery and servicing plan (DSP) should also be secured by condition and approved by the Council, which should follow TfL's best practice guidance (see <https://www.tfl.gov.uk/info-for/freight/planning/delivery-and-servicing-plans>).

Community Infrastructure Levy (CIL)

103 Mayoral CIL will be payable at a rate of £35 per sq.m (see Community Infrastructure Levy Charging Schedule – Mayor of London, February 2012). TfL seeks clarification as to the exact uplift in floorspace, as the CIL Liability form for the development is not available from the Council's website.

Local planning authority's position

104 The applicant has had a pre-application meeting with Bromley Council officers, and it is understood that the scheme is not supported by officers due to principle land use and design issues. The Council's formal position on the planning application is unknown at this stage.

Legal considerations

105 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

106 There are no financial considerations at this stage.

Conclusion

107 London Plan policies on **land use principles (metropolitan open land, playing fields), housing, urban design, inclusive access, flooding, sustainable development and transport** are relevant to this application. The application does not comply with these policies and cannot be supported in principle at this stage. Further information is needed in order to fully comply with the London Plan. The potential remedies to issues of non-compliance are set out below:

- **Land use principles:** The proposal is inappropriate development within Metropolitan Open Land and 'very special circumstances' have not been demonstrated to outweigh the harm to the MOL. Further justification is also required on the loss of the site as a former playing field.
- **Housing:** While the indicative affordable housing offer of 35% accords with Bromley Council's UDP policy, the applicant is required to conduct a financial viability assessment to demonstrate that the maximum reasonable amount of affordable housing is being delivered on this greenfield, windfall site (based on existing use value for open space). This should be scrutinised by the Council and/or their independent consult and both reports supplied to the GLA. Further information is also required on the unit mix across tenures, types of affordable products and location of the affordable units. The quantum of family sized units is fairly low and should be increased. The residential quality is broadly supported although the ground floor requires more work to reduce the number of units per core and improve ground level access. The density is slightly too high for the setting and supports the concern that the design is harmful to MOL openness.
- **Urban design:** While the footprint spread has been contained to the western edge, the mass, scale and continuous wall of development would be harmful to the open MOL setting. The ground floor layout also requires further work in order to create street based activity and improve the public realm.

- **Inclusive access:** Further detail is required on inclusive design of the public realm, and how those with mobility issues access the development conveniently and safely from nearby streets. Clarification is also required on how wheelchair users access the podium from the amenity space, and the location of accessible parking bays needs to be confirmed.
- **Flooding:** The site is within flood risk zone 3a however, the Flood Risk Assessment has appropriately assessed the flood risk and set out a range of mitigation measures and detailed planning conditions to manage the risk. The FRA also sets out an acceptable approach to the management of surface water which will also require a detailed planning condition.
- **Climate change:** A reduction of 253 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 72%. While the carbon dioxide savings exceeds the target in London Plan Policy 5.2, further information is required as outlined above to ensure compliance with London Plan energy policies.
- **Transport:** In principle, the proposal is broadly acceptable in strategic transport terms, although a number of revisions/further information is required in order to ensure full compliance with London Plan transport policies. The Council and the applicant should provide a written response to TfL clarifying these points.

for further information, contact GLA Planning Unit (Development & Projects Team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email: colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

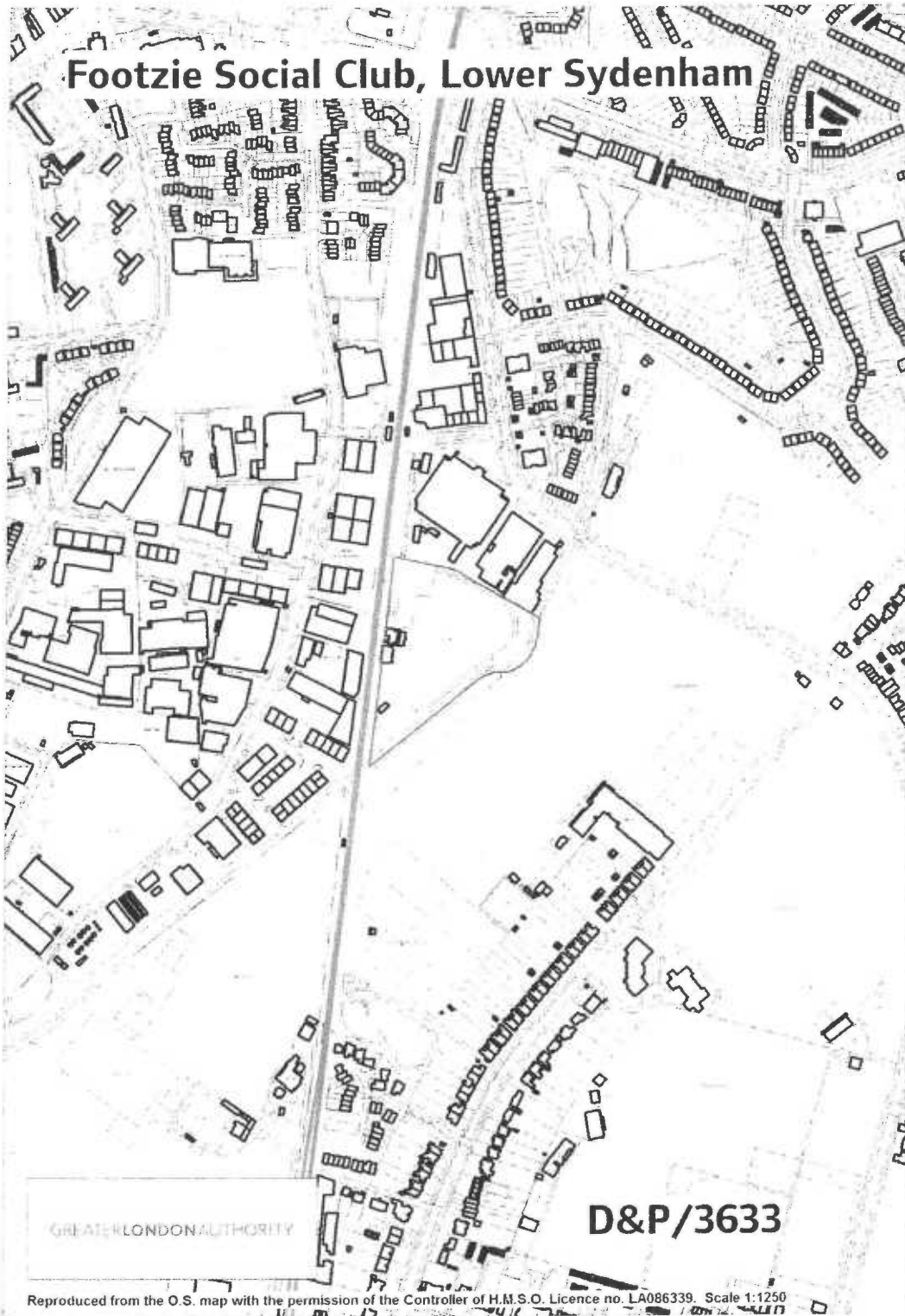
020 7983 4895 email: justin.carr@london.gov.uk

Natalie Gentry, Senior Strategic Planner – Case officer

020 7983 5746 email: natalie.gentry@london.gov.uk



Footzie Social Club, Lower Sydenham



GREATER LONDON AUTHORITY

D&P/3633

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Our ref: 15/1236
Your ref: 15/00701/FULL1

Planning
FAO: Gemma Usher
London Borough of Bromley
Civic Centre,
Stockwell Close,
Bromley BR1 3UH

Transport for London
Group Planning

Windsor House
42 – 50 Victoria Street
London SW1H 0TL

Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk



08 May 2015

Dear Gemma Usher,

Footzie Social Club, Station Approach, Lower Sydenham, London SE26 5BQ

Demolition of the existing buildings and redevelopment of the site by the erection of a basement plus part 8/9/10/11/12 storey building comprising 296 residential units (148 x one bed; 135 x two bed and 13 x three bed units) together with the construction of an estate road, 222 car parking spaces, 488 cycle parking spaces and landscaping of the east part of the site to form an open space accessible to the public.

Please note that these comments represent an officer level view from Transport for London and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project. These comments also do not necessarily represent the views of the Greater London Authority, which should be consulted separately.

Context

TfL's Planning case officer, Gavin McLaughlin, made a site visit on 11 May 2015.

The site of the proposed development is on Sydenham Station Approach. The nearest part of the Transport for London Road Network (TLRN) is London Road A205 approximately 1500m north. The nearest part of the Strategic Road Network (SRN) is Crystal Palace Road A234 approximately 750m south.

The application is Phase 2 of a wider scheme and seeks permission for the erection of 296 residential flats in an eleven story building together with access road, car and cycle parking and publically accessible landscaped open space.

The Public Transport Accessibility Level (PTAL) is 2 (on a scale of 1 – 6 where 6 is classifiable as 'excellent'). A bus stop 356m east of the site on Worseley Bridge Road is served by the 352 service, enabling journeys to Beckenham and Bromley town centres. Lower Sydenham national rail station is approximately 200m north of the site. It is on the Hayes Line managed by Southeastern trains, providing access to London Cannon Street, London Bridge, Waterloo East, London Charing Cross stations, amongst others.

MAYOR OF LONDON



Phase 1 Site Planning History

A development site immediately to the north (Phase 1, application number 09/01664) was formerly occupied by the Dylon International factory, and benefits from a planning permission for redevelopment to a basement and a part five, part six, part seven and part eight storey development consisting of B1 office accommodation (6,884 sq m), A1 retail (449 sq m), A3 café/restaurant (135 sq m), D1 crèche (437 sq m) and 149 residential units with associated parking and landscaping.

The Phase 1 site was granted conditional permission on 15 April 2010 following an appeal and inquiry. All conditions have since been discharged and construction of the development has begun. In addition planning permission was recently (16 February 2015) granted on appeal for substitution of the B1 office space in Block A03 of the Phase 1 site with 74 additional flats. This was initially refused before Bromley Council withdrew its opposition at appeal.

All previous refusals and appeals for the Phase 1 site made no reference to highways or transportation issues and related instead to loss of an existing locally listed building, the height, scale and design of the development, views from Metropolitan Open Land, and trees.

Site Access

Pedestrians

Pedestrians would access and egress the site from a private road which turns off Station Approach into the Phase 1 site just outside Lower Sydenham station's main entrance, at the north west corner of the Phase 1 site. The private road then runs along the west boundary of the Phase 1 site into the Phase 2 site, parallel with the railway line. Footways would be provided on both sides of this access road. Low rise buildings abut the railway line east of the Phase 2 site and a compound at the southern end of the access road is currently used for storage and parking. Pedestrians would also be able to access and egress the development directly to Worsley Bridge Road, which is explained below.

Motor Vehicles

Vehicles would also access the site by the Station Approach route after exiting from the mini-roundabout junction of Station Approach/Worsley Bridge Road/Montana Gardens. However vehicles would egress to Worsley Bridge Road by a junction at the eastern boundary of the Phase 1 site, to the south of the mini-roundabout junction. Pedestrians would also be able to both access and egress the site by this alternative route.

Cyclists

The TA notes that Station Approach and Worsley Bridge Road are designated cycle routes and there is a cycle route from Lower Sydenham Station to Catford Bridge, to the north, through parkland adjacent to the railway line. However beyond this it is unclear from the Transport Assessment (TA) what, if any, provision (eg. signage, segregated lanes, road markings) would be made for cyclists to access and egress the site, and in particular which access routes cyclists would be encouraged to use and how. TfL has also referred to the Ground Level (P01A/DS12) and Landscaping (P01A/215) drawings, which lack detail and are unsatisfactory.

TfL therefore requests for detailed design of the site access to be conditioned for discharge in consultation with TfL. TfL directs the applicant to consult the TfL London Cycle Design Standards (LCDS), which is available from <https://www.tfl.gov.uk/corporate/publications-and-reports/cycling>. TfL will of course defer to the views of LB Bromley as the highway authority for the access roads. However it is unclear at present whether the proposed access would be safe and welcoming for all road users, which must be resolved prior to construction.

Car Parking

Overall the level of car parking proposed would conform with the Further Alterations to the London Plan (FALP, adopted March 2015) and is therefore satisfactory. The application proposes 222 car parking spaces, which represents a ratio of 0.75 per unit.

20% should be provided with active Electric Vehicle Charging Points (EVCPs) and 20% with passive provision in accordance with London Plan policy 6.13. The parking proposed includes 24 wheelchair accessible spaces at a 1:1 ratio to the number of wheelchair accessible residential units, which is acceptable.

Provision of the disabled Blue Badge parking spaces and EVCPs should be secured by condition. In addition all residents of the new development should be prevented from applying for local parking permits by planning condition or the section 106 (S106) agreement.

Car Club

TfL supports the provision of new car club spaces and free memberships for residents of new developments in line with London Plan policies 6.13 and 8.2.

The applicant has consulted local car club operator City Car and the TA proposes provision of two new car club bays within the application site. The TA also includes an offer to provide all residents with 2 years of Car Club membership when they move into their new home.

Cycle Parking (amount)

For land use classes C3 and C4 (dwellings), the minimum provision according to Table 6.3 of FALP (Cycle Parking) is 1 long-stay space per dwelling up to 45 sq m, 2 long-stay spaces per all other dwellings, and 1 short-stay space per 40 units. The required amount of cycle parking for the development as a whole is therefore 444 long-stay spaces and 8 short-stay spaces.

The amount of cycle parking proposed is 488 spaces, which exceeds the requirements of FALP and is therefore welcomed.

Cycle Parking (design)

The proposed layout and design for the cycle parking is unclear. TfL again directs the applicant to consult the LCDS. LCDS 8.1.1 states that 'through the planning process, high quality cycle parking should be regarded as an integral part of a scheme, an essential part of the attraction of a development – never just an add-on to meet minimum policy requirements.'

LCDS 8.1.2 states that cycle parking should be:

- Fit-for-purpose – meeting identified current and future demand, with an appropriate balance of short-stay and longer-stay provision, and accommodating all types of cycle.
- Secure – stands in secure private or indoor spaces, or in visible, well-lit places that have high levels of natural surveillance.
- Well-located – convenient, accessible, as close as possible to the destination, and preferably sheltered.

LCDS 8.4.1 provides specific guidance on the location of cycle parking. The preferred way to integrate street cycle parking with other functions is to locate it in carriageway rather than footway space. Furthermore, cycle parking should be convenient and well located. As a general rule, and bearing in mind the need to integrate with other user needs, cycle parking should be provided:

- As close as possible to the final destination
- Within 15 metres for short-stay parking serving a single destination
- Within 25 metres for short-stay parking serving multiple sites

The layout and design of all cycle parking should be secured by condition to ensure full LCDS and London Plan compliance. This condition should be discharged in consultation with TfL. Alternatively, TfL requests further discussion between TfL, the Council and applicant to agree a satisfactory design and layout for the Cycle Parking prior to determination.

Trip Generation / Modal Split

Trip generation figures have been supplied in the TA and are considered satisfactory. TfL accepts the development trip generation would be unlikely to have a significant impact on the highway and public transport networks.

Bus stop enhancements

TfL requests that nearest bus stop to the site on Worseley Bridge Road is audited against TfL's Accessible Bus Stop design (available from <https://www.tfl.gov.uk/cdn/static/cms/documents/accessible-bus-stop-design-guidance.pdf>).

TfL may request developer funding for step free access at the bus stop depending on its current condition, in which case a site visit meeting between TfL Bus Operations, TfL Bus Infrastructure, LB Bromley and the applicant may be required. TfL will be happy to discuss this matter further by email – please contact gavinmclaughlin@tfl.gov.uk.

Walking

The TA does not include a Pedestrian Environment Review Survey (PERS) analysing pedestrian comfort and way finding in the vicinity of the site, in particular levels of service, safety, and the quality of route(s) to and from local public transport nodes.

TfL suggests that a PERS should be carried out and considered by LB Bromley in their determination of the application. However TfL will defer to the views of LB Bromley as the highway authority for all routes within walking distance of the site.

Legible London

There is currently no Legible London signage in the vicinity. TfL suggests that a new sign may be appropriate showing the pedestrian and vehicular access to the development adjacent to the entrance to Lower Sydenham national rail station.

TfL may seek a S106 contribution for Legible London signage in the vicinity of the site. If requested this contribution would be unlikely to exceed £50,000. TfL will update the applicant and Council on this matter in due course.

Network Rail

Due to the close proximity of Lower Sydenham station, the applicant should consult Network Rail. Network Rail may also need to participate in discussions regarding a new Legible London sign at station entrance to be funded by the applicant via S106.

Travel Plan (TP) measures

As earlier stated the TP would fund provision of a two-year car club membership to each household in the development, which is welcomed. Two years' free car club membership for all residents is acceptable to TfL. This should be secured in the S106 agreement.

Construction

A Construction Logistics Plan (CLP) should be secured by condition in line with London Plan Policy 6.3. This should consider and outline measures to protect cyclists, construction phasing, trips generated, site access arrangements, construction routes, co-ordination with other sites and cumulative impacts of construction traffic.

The CLP must follow TfL's best practice guidance for Developers, available from <http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans>, and for Contractors, which TfL has emailed directly to Council. Data must be provided to TfL on request including expected construction programme, vehicle movements and delivery origins/destinations.

Deliveries and servicing

A detailed Delivery and Servicing Plan (DSP) should be secured by condition and approved by LB Bromley in conjunction with TfL prior to occupation. This should follow TfL's best practice guidance (see <https://www.tfl.gov.uk/info-for/freight/planning/delivery-and-servicing-plans>).

Community Infrastructure levy (CIL)

Mayoral CIL will be payable at a rate of £35 per sq m (see Community Infrastructure Levy Charging Schedule – Mayor of London, February 2012).

TfL seeks clarification as to the exact uplift in floorspace, as the CIL Liability form for the development is not available from the Council's website.

Summary

In principle TfL considers the proposal to be acceptable from a strategic transport perspective. However to ensure the application complies fully with London Plan transport policies, the following matters should be addressed by the S106 agreement and/or condition:

- Detailed design of the site access should be conditioned for discharge in consultation with TfL. TfL is not satisfied the access would be safe and welcoming for all road users.
- Blue Badge parking spaces and EVCPs
- TfL may request developer funding for step free access at the nearest bus stop depending on its current condition
- A Delivery and Servicing Plan (DSP)
- A Construction Logistics Plan (CLP)
- A PERS audit
- The applicant should consult Network Rail
- TfL may seek a S106 contribution for Legible London signage
- Mayoral CIL at a rate of £35 per sq m

Yours sincerely

Gavin McLaughlin
Planner

