

Application No : 16/02117/FULL1

**Ward:
Crystal Palace**

**Address : Orchard Lodge William Booth Road
Penge London SE20 8BX**

OS Grid Ref: E: 534298 N: 169951

Applicant : Mr Luke Cadman

Objections : YES

Description of Development:

Demolition of existing buildings and erection of two 4-5 storey blocks and one 5-6 storey block of flats comprising 252 residential units (84 x 1 bed, 120 x 2 bed and 48 x 3 bed including affordable housing provision), basement car parking, landscaped podium deck, open space, play space, associated access roads, private and communal landscaping, cycle parking, recycling and refuse stores and associated works including widening of existing vehicular access onto William Booth Road.

Key designations

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Adjacent Metropolitan Open Land
Open Space Deficiency
Smoke Control SCA 6

Proposal

The proposal is to demolish all existing buildings on the site and redevelop the site for 252 residential units including a change of use to Class C3. It is proposed to erect one 4 storey, one five storey and one 5-6 storey block of flats with a mixture of 1, 2 and 3 bed flats with basement parking, podium deck, access roads, soft and hard landscaping, refuse storage, cycle storage and an on-site combined heat and power (CHP) system.

The proposal comprises:

- 84 x 1 Bed flats
- 120 x 2 Bed flats
- 48 x 3 Bed flats
- 180 private market units (71.4%) and 72 affordable units (28.6%)
- 246 or 98% car parking spaces
- 27 wheelchair units and associated car parking
- Basement car parking to principal 5-6 storey block providing 86 spaces
- Surface parking providing 160 spaces
- 420 cycle parking spaces are provided in secure cycle stores
- 2 car club car parking spaces
- Mixture of building heights of between 4 and 6 storeys in height

- Modern design and appearance to buildings with flat roofs and feature glazing to all balconies/external spaces
- Largely brick construction with flush and projecting balconies
- Brick detailing, two brick colours and grey window/doors to all blocks
- Varied streetscapes and elevations in a cohesive pallet of materials
- Site layout is well spaced but concentrated to the north with communal landscaping along the southern boundary
- Set back from boundary with MOL
- Scale of buildings relates to adjoining properties and the adjoining landscape
- All ground floor units have separate access to provide a continuous frontage development to all blocks
- Vehicular access to most parts of site with parking in basement, landscaped parking areas or on-street car parking spaces
- Podium deck for community use
- Private amenity for every unit and high quality landscaped communal open space to southern and western boundaries totalling 4492sqm
- Formal Children's play space of 604sqm and informal space of 1772sqm
- High quality landscaping and tree planting throughout
- Widening of access road into site, following purchase of land/right of access from 6 owners on William Booth Road and re-provision of allocated car parking spaces on site
- Density 140 units per hectare or 439 habitable rooms
- Sustainable construction and specifications
- Internal refuse stores throughout
- CHP Plant
- Green roofs and PV panels

The application has been revised in a number of respects to address matters raised in respect of drainage, affordable housing, car parking levels and those issues identified by the GLA.

The applicant has submitted the following documents to support the application:

Planning Statement

This outlines the background to the application and site, the proposed development and the planning policy context. It sets out an assessment of the proposal from a policy context and the benefits of the scheme. It identifies the key considerations of the proposed development and outlines an agreement in principle to provide contributions in respect of education, health, transport (Travel Plan and car club), community facilities, affordable housing and wheelchair provision and monitoring in accordance with the Council's SPG.

It makes the following summary points in support of the proposed development:

- Will redevelop a previously developed vacant brownfield site in an accessible and sustainable location which is supported by policy
- The site is currently in a poor state of repair and visually detracts from the surrounding area
- A new residential community in a key location in Anerley providing housing of an exemplar design in a high quality landscaped setting
- The proposal will raise the profile of Anerley by providing a high quality residential development

- Scheme will deliver a third of the Council's annual housing delivery requirement
- The design is for a high quality which is sustainable over the long term
- The landscaped setting will create an attractive environment for new residents to live in
- Each unit will benefit from a balcony, roof terrace or ground floor terrace and front garden area.
- The development of new housing satisfies a variety of local needs.
- The proposal exceeds housing space standards for new residential developments

Affordable Housing Statement

This has been revised since submission with a greater proportion of affordable rent units now being provided. It outlines the tenure split and the location of the affordable housing on the site, listing the number of bedrooms and which are wheelchair units. It proposes that 40% will be shared ownership units and 60% will be affordable rented units which equates to 37% habitable rooms and 63% habitable rooms respectively. The location of these units is towards the western corner of the site and the majority will occupy the smaller block on the western boundary. Discussions have already commenced with a Registered Provider.

The breakdown is as follows:

Affordable Rent:

- 1 Bed x 8 units (3 x wheelchair)
- 2 Bed x 26 units (1 x wheelchair)
- 3 Bed x 10 units

Total: 44 units

Intermediate:

- 1 Bed x 12 units (1 x wheelchair unit)
- 2 Bed x 17 units (2 x wheelchair unit)

Total: 29 units

273 habitable rooms = 35 % provision and a 60:40 split between affordable rent and intermediate

7 Wheelchair units = 10%

Design and Access Statement:

This document discusses the proposed scheme in some detail and includes the site description and context of development, the constraints and opportunities and the evolution of the design. The proposal is outlined in some detail including the aims and objectives and an assessment of the proposed design and site layout. It identifies the compliance with relevant standards including Part M of the Building Regulations in respect of accessibility and wheelchair units and associated car parking. It outlines the compliance of all the residential units to London Plan Housing Standards and the indicative landscaping scheme. Amenity space provision is outlined in detail including the formal children's play space of 604 sqm and total amenity space of 2116sqm. The design and massing of the proposed buildings are addressed and how the different heights of 4-6 storeys respond to their context. This includes indicative materials (buff and brown brick with grey UPVC joinery

and metal or glass balconies) and the impact on views and townscape. It also addresses sustainability and provides a crime impact assessment and lighting.

It concludes that the Design and Access Statement demonstrates an understanding of the site and its context which has led to an appreciation of the sites characteristics and relationship with surrounding land uses. In particular, regard has been paid to the effects of the redevelopment on the character and setting of the adjacent Metropolitan Open Land (MOL) and residential amenity. The design assessment demonstrates that the proposed development is an appropriate response to the setting of the MOL and that this high quality contemporary design and landscaping scheme will be a positive contribution to the local context.

Town and Visual Impact Assessment:

The assessment is to consider the potential townscape and visual effects arising from the application on the site and the surrounding area. The assessment has established that the site has due to its former use and separation from the adjoining residential areas its own character, being vacant, of no particular architectural quality and the trees are of a poor quality. There is therefore an opportunity to enhance the character of the area.

The report concludes that overall the proposed development would have a beneficial effect on the townscape character of the site and the area due to the introduction of good quality design, appropriate scale and materials set within an enhanced landscape setting. Permeability will be increased and the development will complement existing development which would enhance the setting of the adjacent MOL.

In terms of the effects on views from the surrounding area the proposed development will be seen from a limited number of locations. Where it is seen it will replace views of existing vacant buildings of limited quality and introduce new planting on the site boundaries. Whilst there will be an increase in the amount of built form visible it would be more appropriate and of a high quality design. The character of the adjacent MOL is influenced by views of buildings in the surrounding area. Whilst the new development would be seen and would be larger than the existing buildings, it would be consistent with the overall character of the scene which comprises buildings of similar scale and use. The proposed planting will reduce the visual role of the buildings within the wider area over time. It is therefore considered that the character and visual amenities of the adjoining area of MOL would be enhanced by the development proposals and the requirements of policy G6.

Community Floorspace Assessment and Addendum:

The report identifies the previous community use of the site, the current condition of the existing buildings and the planning policy framework in respect of community uses, their protection and loss. It further outlines the socio-economic profile of Anerley, an identification of existing community use provision within a 0.5km radius of the site and the potential for accommodating alternative community uses on the site.

The report concludes that the existing buildings were constructed for a specific purpose and there is no longer a demand for the former use. The retention and continued use of the buildings is not financially viable and any scheme would require a redevelopment.

The full range of community uses, public sector and other community tenants have been assessed with a reasoned conclusion that no realistic alternative community use has been

identified. In addition any further community floorspace would potentially jeopardise the existing facilities.

It is concluded that the loss of the existing community use is appropriate and has been fully justified. The redevelopment will deliver significant planning benefits, addressing recognised deficiencies in the local area. Planning permission should therefore be granted and the loss of social infrastructure is acceptable.

The Addendum provides further clarification on why it is considered that a contribution towards Anerley Town Hall and Crystal Palace Community Development Trust (CPCDT) is the most appropriate way forward to address the loss of community use on the application site. This is due to its existing facilities, those in the wider area and the Town Hall provides a sustainable community resource in the immediate vicinity of the site that provides a range of services which respond to the identified deprivation in the neighbourhood. Its recent funding from the GLA, long term objectives and established position in the locality make it the most appropriate local resource to support and assist with additional funding to enable it to provide further improvements to general facilities in the locality.

Transport Statement and Addendum:

The assessment outlines the traffic and highways impacts of the proposed development. It considers the traffic generation and the capacity of the local highway network to accommodate the proposed increases and assesses this against local and national policies. It also outlines the accompanying Travel Plan and provides a Construction Management Plan and Service and Delivery Plan.

It concludes that the application site has a PTAL rating of 3 – moderate and the site is within walking distance of a number of local services, including schools, convenience stores and supermarkets. Anerley station is a 5 minute walk and Crystal Palace station is a 14 minute walk. Bus stops provide connections to a range of destinations within 4 minutes' walk of the site.

A review of road safety shows no reported incidents in the last 3 years. Existing trips are identified and trips from the proposed development have been determined using locally specific trip rates observed at the Anerley School site. This indicates the site would generate 46, 24 and 37 trips in the AM school and PM peak hours respectively.

The development is therefore anticipated to result in a net increase of 38 trips in the AM peak, 10 trips during the school peak and 28 in the PM peak. Operational assessments of the junctions located in the vicinity of the site, have confirmed that the proposed development and the net traffic that it is predicated to generate will not have a material effect on the local highway. Indeed, all junctions are predicted to continue to operate within the respective capacity thresholds.

The Addendum confirms the increase in car parking spaces on site from 240 (95%) to 246 (98%) an increase of 6 spaces. The provision and identification of up to 2 car club spaces and their availability to members of the local community. This could be increased to 3 spaces if necessary. Confirmation is provided that the new access road is to be 6.8-7.0m wide and can be dealt with under S278 and includes a 2m wide footway on either side of the new access which has been agreed in principle by the owners of the existing car parking spaces which will be relocated onto the application site.

In terms of existing on-street car parking on William Booth Road this has been measured at 79% capacity and confirmation of a commitment to fund a Traffic Study is provided with the subsequent restriction of new residents being eligible for a parking permit.

Travel Plan:

The Plan sets out a framework and strategy to encourage and enhance sustainable travel by both residents and visitors. It provides a commitment to minimising the impact of the development on the local transport network through encouraging the use of alternative means of transport and sustainable travel, by reducing the need to travel and providing alternatives to the car. It aims to reduce car dependency, optimise car occupancy and encourage alternative non-car travel modes.

The proposed measures are to encourage walking, cycling and use of public transport, manage car parking levels and provide electric charging points on the site and the provision of a car club. Two car club parking spaces are provided on site and new residents will be given free membership and free driving credit to encourage the use of this facility.

A Travel Pack will be distributed to all households, outlining the above measures, providing maps and public transport information, websites and access to a Travel Plan co-ordinator, cycle parking and training and full details of the car club scheme. In addition a board will also be provided on site making this information available and information about sustainable travel options.

Daylight, Sunlight and Overshadowing Report:

Assesses the impact of the proposed development on the daylight and sunlight currently enjoyed by existing properties and proposed dwellings in accordance with BRE Guidelines in Site Layout Planning for Daylight and Sunlight A Guide to Good Practice, 2011.

In relation to Bodleian House, Carfax House, Radcliffe House, 47-73 William Booth Road, 1 & 2 Orchard Lodge the results demonstrate that the proposals will not bisect a 25 degree line drawn from the mid-point of the windows serving the lowest level of residential accommodation and therefore in accordance with the BRE Guidelines the proposals will not have a significant implication on the daylight and sunlight enjoyed by these properties. The results identify that the proposals will not have a significant effect on the daylight and sunlight enjoyed by the neighbouring residential properties.

An analysis of the proposed development also identifies that all apartments will have a habitable room that will achieve the recommended minimum average daylight factor and that 77% of habitable rooms will be achieved. The internal courtyard flats and neighbours amenity space in all instances comply with the relevant standards and the proposed accommodation will enjoy a good level of daylight within an urban context.

Arboricultural Report:

The report provides a full tree survey of the site and identifies the existing trees on the site and boundaries, their category and those that are intended for removal. Overall tree coverage of the site is sparse, limited to a few ornamental trees of little merit and outgrown conifer hedges on some boundaries. Most trees are to the boundaries of the site and are of low quality and value. The proposals are for the removal of the trees on the site and the retention of the better quality trees on the boundaries. The proposals include extensive tree

planting as part of the overall scheme which will compensate for the trees to be removed. Those trees to be retained will be protected and incorporated into the design of the proposed landscaping.

Energy Statement:

This describes the design and technology options appraised and proposes the preferred energy strategy. The development will significantly reduce CO₂ emissions by incorporating a range of passive design and energy efficiency measures, including improved fabric standards beyond the requirements of the Building Regulations Part L 2013, energy efficient ventilation and low energy lighting.

The strategy proposes gas-fired CHP and efficient gas-fired boilers connected to an on-site district heating system, which will supply 80% of heating and hot water for the entire development. It is anticipated that the use of the CHP engine and communal heating network will further reduce emissions by 33.5%.

Photovoltaic systems will be provided to supply renewable energy to the development. The assessment shows that the proposed PV system will result in 2.1%CO₂ reduction for the entire site. This amounts to CO₂ savings of 35.9% and meets the required London Plan target.

Daylight and overheating issues have also been addressed accordingly.

Sustainability Statement:

The report summaries the sustainability measures being proposed for the development. It addresses energy, water, materials, surface water run-off, waste, pollution, health and wellbeing, management, land use, ecology and biodiversity and transport. Many of the issues are addressed in more detail under other reports.

The statement concludes that the design has considered the potential environmental impacts and how these can be managed and mitigated in line with relevant policies. The proposed development has targeted sustainability throughout the lifetime of the building. In particular energy, pollution and water efficiency measures, which will be integral to the building's design.

The proposed energy solution responds to the London Plan – Be Lean, Be Clean, Be Green principles and includes various energy efficiency measures as well as low-carbon technologies. The proposed energy strategy can achieve CO₂ savings of 87.7tCO₂ which is equivalent to 35.9% reduction over the Part L 2013 Building Regulations Target Emission Rate. The development therefore exceeds the London Plan target of 35%. All dwellings within the development will be provided with water efficient fixtures and fittings to reduce water consumption. Others matters are addressed in the additional reports submitted with the application but high sustainability principles are established throughout the proposal.

Air Quality Assessment:

The report identifies the existing air quality indicators the predicted levels air quality levels without development of the site and predicated levels with the development of the site as proposed. The report covers both air quality associated with traffic movements and an assessment of the construction phase and associated activities.

It concludes that under the 'no development' scenario air quality levels are maintained and within recommended levels. With the proposed development it is predicted that there will be a minor increase in the annual mean NO₂ concentration at the selected receptors therefore this will result in a negligible increase above the 'no development' scenario.

A further Air Quality Neutral Assessment as required by the London Plan highlights that emissions from road traffic vehicles from the proposed development would be above the calculated benchmarks and therefore specific mitigation measures are required. These would include a travel plan to encourage different forms of transport rather than private vehicles, restrictions on car parking spaces, provision of cycle storage and the use of a car club.

Emissions from operational plant, i.e. boilers and the CHP plant requires no mitigation.

In relation to the construction phase activities the risk is low to medium and overall not significant however mitigation measures to minimise the impact are identified and recommended.

Impact of Noise Sources:

This is to determine the impact of the existing noise environment on the proposed residential development and identifies mitigation measures required.

External amenity noise levels are predicted to fall within the recommended criteria of 55dB_L for amenity areas for the majority of the site. There is a slight increase on the upper floors due to facing towards the school and railway line. This is not considered to be detrimental to the development. It is recommended that mitigation to the upper floors of facades facing the railway line is in the form of upgrading of the trickle vent to the upper floors. Internal noise levels are acceptable across the development and noise does not present a constraint to development

Surface Water/SUDS Strategy:

This has been significantly revised since originally submitted and identifies the surface water and sustainable urban drainage systems (SUDS) options for the site and those measures that have been incorporated into the design including their management. It is identified that on-site water storage will be provided by way of a new dry pond adjacent to the southern boundary of the site, a tanked system for storm conditions, 90% green roofs, the landscaped podium. Permeable paving is also proposed throughout. These measures have reduced outflow from the site of 12l/s.

Utilities Assessment:

This outlines the existing utilities, location of services and works and connections that will be required, including water, gas, electricity and telephone services.

Flood Risk Assessment:

The report is a full assessment of all potential risks from flooding and a technical assessment of the relevant issues. The report looked at flood sources to and from the site in the context of the existing and proposed development. The proposed development is classified as 'More Vulnerable' according to the NPPF Vulnerability Classification; however due to its location within the Flood Zone 1, it is considered appropriate under the requirements of the Sequential Test.

The risk of flooding from fluvial, sewer and artificial sources is considered low. The risk of surface water flooding at the site is also low-moderate, and any potential off-site impacts will be addressed through effective surface water management options. The site investigation on ground conditions has shown the risk of flooding from groundwater is low.

Archaeological Assessment:

The report assesses the historic use of the site and its potential for likely archaeological remains. There are no designated or undesignated archaeological assets on the site and it is not located in an Area of Archaeological Significance. The site has low archaeological potential for all periods of human activity. The impact of previous development has been severe and widespread and any potential remains present are likely to have been degraded or removed entirely, no further mitigation is considered necessary.

Statement of Community Involvement:

This outlines the public consultation process that the applicants have undertaken, prior to the submission of the application. This includes a leaflet posted in the local area (5,670), a public exhibition on 25th November 2015 and meetings and discussions with local representatives, including the James Dixon School, Local and Ward Councillors and Residents Associations. Door to door canvassing also took place in the local area, including letters and a consultation website and a Members Pre-application Site Visit.

Geotechnical and Geoenvironmental Report:

A ground survey report and desktop study of the sites history and intended site investigation have been provided. Initial site investigations have taken place including relevant soil, soil gas, surface water and ground water sampling have been undertaken and have identified various contaminants. Further sampling and remediation is therefore required.

Ecological and Biodiversity Impact Assessment:

This addressed all ecological issues on the site and includes details of a Phase 1 appraisal, Bat survey including internal and external assessments of the existing buildings and a badger survey. The surveys found little evidence of bats or badgers using the site with bats using the potential for the site to be used as foraging. None of the buildings displaced evidence of use by bats. There was no evidence of other protected species. The closest statutory site is Dulwich Upper Wood Local Nature Reserve sited 1.3km northwest of the site and the nearest SSSI is Croham Hurst sited 6.3km to the south of the site. There is therefore unlikely to be any direct impact on these designations as a result of the proposed works. On site there is no habitat of any significance.

It is recommended that the landscape strategy uses native species which may provide new foraging resources for bats and will increase the biodiversity value of the site and support wildlife. The removal of suitable bird nesting habitat should be completed outside of nesting season and only removed after a survey by an ecologist. The reports conclude there is no overriding ecological constraint to development.

Lighting Calculations Report:

This addresses light from street lamps and lighting of the roads, footway and external car parking areas. The report includes a lighting layout to provide the minimum level of light required on the site. This includes 6m high lighting columns to the main road layout and 1m

high LED bollard lights to the car park areas and within the landscaped areas. The 6m high column lights have been designed so that no direct light is emitted above the horizontal; glare and light spill have been mitigated as far as practicable by the use of directional LED units.

Location

The application site is 1.8 hectares and is accessed from the western end of William Booth Road, the main access road from the western edge of Anerley Road, to a series of cul-de-sac developments that are predominantly two storey terraced dwellings. Two storey dwellings and their private gardens adjoin the north eastern boundary of the site. To the southeast of the site is James Dixon Primary School and the north western boundary is the former Anerley Boys School site which has now been redeveloped by two four storey residential buildings, Darwin House and Radcliffe House on Worcester Close and further blocks of flats comprising Scholars Court off Madeline Road. All of the land to the north-west, south-east and south of the site is within Metropolitan Open Land (MOL).

The site comprises an enclosed estate formed by a series of mainly one and two storey buildings with the exception being a single four storey building to the east of the site. The site slopes in a north to south direction with a drop of approximately 5m in ground level. The site was previously used as a remand centre and most recently as a residential institution caring for people with Autism. The site is currently vacant.

Comments from Local Residents

Nearby properties were notified and representations have been received which can be summarised as follows:

27 letters of objection, 2 neutral letters raising concerns and a petition with 38 signatures have been received. Objections have been raised on the following grounds:

- Impact on William Booth Road (WBR) which is already dangerous, with unsuitable access and road must be improved
- Concern regarding construction vehicles and who these will be managed esp. during peak school hours, this needs to be addressed
- Development should not be extended in the future towards the school in the future.
- Parking is already a problem at the school during pick up and drop off hours and already high in the day
- Safety risk to pedestrians
- Concern access for emergency vehicles
- Impact of construction noise on school children
- Parking spaces do not account for multi-car households, more car parking is required for all residents
- An additional access road should be considered as the cul-de-sac is not large enough for this level of increased activity
- Height of new development is excessive
- Overlooking of the school
- Parking on WBR is already at capacity
- Overdevelopment in a medium density area

- WBR comprises 2-3 storey dwellings with pitched roofs, new development will be out of place
- Loss of open feeling in WBR and MOL contrary to policies G2, G6 and G8 of the UDP
- Proposed design bulky buildings contrary to BE1 of the UDP
- Detrimental impact on character of WBR and Sycamore Grove
- Negative effect in visual amenities which will be lost and not in keeping with spatial standards
- WBR is quiet and new development will cause chaos esp. during school pick up/drop off
- Increase in crime/litter/antisocial behaviour and noise due to increase in occupants
- WBR is single lane due to double parking which is not acceptable
- Increased pedestrian activity on local footpaths, close to dwellings causing a detrimental impact on local residents, loss of privacy and detrimental impact on quality of life.
- Transport assessment took place outside of peak school hours
- Boundary hedges removed and trees will take a long time to mature so will be years before the impact of the buildings is softened
- Detrimental impact on traffic safety and pupils of the nearby school
- A smaller development would fit better within the surrounding area and neighbourhood
- More traffic and congestion
- People park in WBR for the station
- Additional people using overcrowded transport infrastructure and trains
- Is the access wide enough for increased traffic
- Increased traffic noise and impact on quiet enjoyment of existing properties
- Increased threat to safety of children
- High rise flats will block out light and overlooking of houses and gardens
- Views from houses affected and open character lost
- Poor design and mass and bulk of the development is intrusive
- Disturbance during buildings works and living in the middle of a building site
- Too many flats and too high
- All existing vegetation should be preserved as contributes to green character of area and acts as a barrier
- Consultation process not adequate
- Existing footpaths also need upgrading to cope with increased use and were not intended for this level of use
- Development should not be allowed on this site
- Has the impact on existing services been taken into account esp. schools and GP's
- WBR is a child friendly neighbourhood that will be totally changed
- Wheelchair access needs to be improved at the alleyway at end of Owen Walk and the corner of Anerley Road and WBR
- Access for those with disabilities also needs to be considered if to be used by new residents and existing footpaths and crossing upgraded to current standards (currently below)
- A 20mph speed limit and speed bumps introduced
- Dust from the development impacting local residents and their health

- 5 storey blocks will dwarf the surrounding buildings and be twice the height of adjoining buildings, efforts to minimise the impact are not sufficient
- Where will visitors and delivery vehicles park
- Existing local services have been cut and cannot support such an increase in additional residents
- Will the developers be charging for car parking spaces which will cause even greater parking pressure in the local area.
- This proposal is not sensitive to local residents and their quality of life.

15 letters of support have been received with the following comments:

- Support family housing
- Plenty of new car parking for residents
- Derelict site being brought back into use and built on
- Affordable housing is a benefit
- Will bring more people, money and business to the area
- Will improve the area and Anerley is in need of regeneration
- Good for the area and good use of disused buildings
- We need more houses and people need places to live
- Designs are good and in keeping with existing developments
- Development not overwhelming when viewed from MOL
- Welcome additional housing and affordable housing

Consultee Responses

The Greater London Authority (GLA):

London Plan policies on housing, affordable housing, urban design, inclusive access, sustainable development and transport are relevant to this application. In general the scheme is supported in strategic planning terms. However, further information and discussion, as stated below, is required to ensure the proposal complies with the London Plan.

Principle of development: The change in land use from social infrastructure to residential accommodation is supported in strategic planning terms; provided the Council are satisfied there is no identified local need for other forms of social infrastructure on this site.

Housing: The proposal is in accordance with London Plan policies 3.3, 3.4, 3.5, 3.8 and 3.11. The applicant should confirm the quantum of playspace provision to be provided on site and provide details of any off-site provision.

Affordable Housing: The applicant is providing 35% affordable housing by habitable room with a tenure mix of 58% intermediate and 42% affordable rent. This meets Bromley Council's affordable housing policy requirements.

Urban Design: Generally the urban design approach is supported; however, there are concerns regarding the level of car parking to be provided on site, and the applicant should further consider the interaction of the scheme with the adjacent MOL.

Inclusive access: The applicant should include details of how disabled people access the site from William Booth Road. The Council should secure compliance with Building Regulations M4 (2) and M4 (3) via condition.

Sustainable Development: The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments in this report should be addressed before compliance with London Plan energy policy can be verified. The proposal complies with London Plan policies 5.12 and 5.13. Conditions securing the drainage approach and climate change adaptation measures should be included within the application when it is referred back to the Major.

Transport: TfL encourage the applicant to reduce on-site car parking provision. TfL recommends 3 years free car club membership is offered to residents, secured by the s106 agreement. The Travel Plan should be secured via the s106 and the Construction Logistics Plan and Delivery Servicing Plan should be secured by condition.

Recommendation: That Bromley Council be advised that while the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan, for the reasons set out in the report; but the possible remedies set out in that paragraph could address these deficiencies.

Highways:

The site is located within an acceptable walking distance to Anerley Rail Station located south east of the site. There are also five bus routes within an acceptable walking distance of the site. Whilst located beyond an acceptable walking distance (960m) Crystal Palace Rail Station is located approximately 1km north of the site. The site has a public transport accessibility level (PTAL) of 3 across the majority of the site rising to 4 in the north east corner, on a scale of 0 to 6b where 6b is most accessible.

Vehicular Site Access: Vehicular access to the site is via William Booth Road off Anerley Road. The existing would be widened to 6.0m wide this will result in relocation of parking spaces; however more details are required. The above works (i.e. road widening) should be secured by section 278 agreement.

Car parking: A total of 240 car parking spaces are proposed for the development, equivalent to a parking ratio of 0.95 spaces per dwelling. 25 parking spaces will be provided for disabled users and 20% active and 20% passive electric car charging spaces will be provided in accordance with the London Plan.

A car club is also proposed for the site, and up to two car parking spaces near to the site access will be allocated for car club vehicles. Although the applicant has provided some measures to reduce the reliance on private car usage I believe that the applicant should increase the parking ratio to 1:1.

Cycle Parking: A minimum of 420 cycle parking spaces will be provided to satisfy the FALP standards, with six short stay spaces provided for visitors to the residential development. This is acceptable.

Off-Site Parking: Off-site parking in the vicinity of the site on local streets, including William Booth Road, is currently uncontrolled and this office has identified that it will be important for the development to provide sufficient car parking capacity on site such that overspill parking off-site should not be necessary.

The intention is therefore that all resident and visitor parking associated with the proposed development will be accommodated on the site itself and this has been important in considering the proposed level of provision.

Whilst a parking survey of local streets has not been conducted, a review of information relating to the consented extension of the James Dixon Primary School has been undertaken and it is noted that the TA approved in support of that planning application included parking surveys of the utilisation of on-street spaces in the local area including William Booth Road, Sycamore Grove and Robinia Close. The surveys, undertaken on Tuesday 13th May 2014, identified that at peak, the observed parking on local streets did not exceed 79% of the available parking capacity, thereby confirming that parking capacity is still available on the local highway at peak times and that double parking or other similar practices should not unduly affect traffic flow.

Trip Generation

Existing Trip Generation

Former Site Trip Generation (Peaks Only)

Peak	Arrivals	Departure	Total
AM (0800-0900)	8	0	8
School (1430-1500)	2	12	14
PM (1700-1800)	0	9	9

Proposed Trip Generation

Initial Trip Rates: The TRICS database was interrogated for a range of site combinations including private flats, non-private flats and mixed ownership flats to derive an indicative trip rate for the proposed development. For the purposes of analysis, all sites within London in the mixed private / affordable use class with between 30 and 300 dwellings, in areas of between PTAL 1 – 4 (inclusive), were selected.

Initial Residential Trip Rates (per unit)

Peak	Arrivals	Departure	Total
AM (0800-0900)	0.105	0.197	0.302
School (1430-1500)	0.105	0.158	0.263
PM (1700-1800)	0.167	0.035	0.202

Locally Specific Trip Rates: To consider the potential trip generation characteristics of the proposed development in further detail, in the specific

context of the proposed land use and local area, it was previously identified that a development comprising of a total of 217 flats (Phase 1 = 129, Phase 2 = 88) is located immediately adjacent to the Orchard Lodge site. Both Phases 1 and 2 are complete.

Validation of Locally Specific Trip Rates: The survey was conducted on Thursday 4th June 2015 between the hours of 0800-0900 in the morning and 1430-1800 in the afternoon/evening. The data has subsequently been reviewed and a summary of the observed information, translated into trip rates (based on the total of 217 flats) is presented below at.

TABLE - Observed Residential Trip Rates (per unit) for the Anerley School Development – 04/06/15

Peaks	Arrivals	Departures	Total
AM (0800-0900)	0.037	0.147	0.184
School (1430-1500)	0.037	0.060	0.097
PM (1700-1800)	0.092	0.055	0.147

Application of the observed trip rates (above Table) to the proposed development of 252 flats therefore indicates that the site would be expected to generate 46, 24 and 37 trips in the AM, School and PM peak hours respectively as summarised below

Peaks	Arrivals	Departures	Total
AM (0800-0900)	9	37	46
School (1430-1500)	9	15	24
PM (1700-1800)	23	14	37

Net Trip Generation: The net impacts of the development proposals have subsequently been considered. In traffic generation terms, this is based upon the proposed development traffic minus the existing site traffic associated with the current land uses.

The net traffic impact of the proposed development is summarised at TABLE below, based upon the current draft scheme proposals of 252 dwellings. This shows that there is anticipated to be a net increase of 38, 10 and 28 vehicles in the AM, School and PM peaks respectively

Scenario	AM Peak	School Peak	PM Peak
Proposed (252 units)	46	24	37
Former Use	8	14	9
Net Trip Generation	38	10	28

An appraisal of William Booth Road and the junction with Anerley Road was conducted, in order to ensure that sufficient capacity was available to accommodate a proposed development at the Orchard Lodge site in the order of 200 dwellings. Details of that assessment were submitted to LBB who subsequently confirmed that the capacity of William Booth Road should not

constrain the proposed development, based on the information provided. Since that time, further pre-application discussions with officers at LBB have resulted in the proposals being updated to reflect an increased density of the proposed development, to allow a greater numbers of homes to be provided (252).

Car Parking: Liaison with LBB to date has confirmed that the maximum standards set out within their UDP (2006) provide the current guidelines for parking provision in the borough. For residential development, the standards allow up to one space per one or two bed unit and up to 1.5 spaces for larger three bed units. A slightly lower level of maximum provision is set out for affordable housing.

Under the latest London Plan, the proposals would be defined as being within PTAL range 2-4 and classified as 'urban', with around 350 habitable rooms per hectare and 110 units per hectare. As such, the development proposals would sit between the "up to one space per unit" and "up to 1.5 spaces per unit" maximum residential parking guidelines.

Further guidance is contained in the 'Parking Standards Minor Alterations to the London Plan' which were published in March 2016, however, this only affects parking standards in outer London boroughs with low PTAL (0-1), or in some areas of PTAL 2.

As such, a total of 240 car parking spaces are proposed for the development, equivalent to a parking ratio of 0.95 spaces per dwelling. This level of provision falls under the 100% provision preferred by Bromley; therefore the applicant should increase this ratio to 1:1

25 parking spaces will be provided for disabled users and 20% active and 20% passive electric car charging spaces will be provided in accordance with the London Plan.

A car club is also proposed for the site, and up to two car parking spaces near to the site access will be allocated for car club vehicles. This is welcomed; the applicant should also encourage the new occupiers by providing 2 year free membership.

Cycle Parking: A minimum of 420 cycle parking spaces will therefore be provided to satisfy the FALP standards, with six short stay spaces provided for visitors to the residential development. This is acceptable.

The trips generated by the London Autistic Spectrum Condition Centre have been estimated as 8, 14 and 9 trips in the AM, School and PM peaks respectively. Trips for the proposed development have been determined using locally specific trip rates observed at the Anerley School site, which is located adjacent to the Orchard Lodge site and consists of 217 flats. Application of the observed trip rates to the proposed development of 252 flats therefore indicates that the site would be expected to generate 46, 24 and 37 trips in the AM, School and PM peak hours respectively.

The proposed development is therefore anticipated to result in a net increase of 38 trips in the AM peak, 10 trips during the school peak and 28 in the PM peak. Operational assessments of the junctions located in the vicinity of the site, forming the study area, have confirmed that the proposed development and the net traffic that it is predicted to generate will not have a material effect on the local highway, all junctions are predicted to continue to operate within the respective capacity thresholds.

The applicant should address the following:

Car parking ratio should increase to 1:1

A car club is also proposed for the site, and up to two car parking spaces near to the site access will be allocated for car club vehicles. This is welcomed; the applicant should also encourage the new occupiers by providing 2 year free membership

A sum of £25000 should be secured for the future parking and traffic study within the area. This would also include any additional traffic management measures to be carried out as a result of the development including upgrading of crossing facilities to toucans at Anerley Road. The works on the highway would need to be secured by Section 278 agreement.

The Travel Plan submitted as part of the application is satisfactory.

Transport for London (TfL):

Location: The site is bound by Worcester Close and residential properties to the north, residential properties to the east, and playing fields to the south and west. The site is located a significant distance from the Transport for London Road Network (TLRN). The closest sections of the Strategic Road Network (SRN) are the A212 Church Road approximately 800m north west of the site and the A234 High Street Beckenham approximately 1km east of the site. The site is located within an acceptable walking distance to Anerley Rail Station located south east of the site. There are also five bus routes within an acceptable walking distance of the site. Whilst located beyond an acceptable walking distance (960m) Crystal Palace Rail Station is located approximately 1km north of the site.

The site has a public transport accessibility level (PTAL) of 3 across the majority of the site rising to 4 in the north east corner, on a scale of 0 to 6b where 6b is most accessible.

Vehicular Site Access: Vehicular access to the site is via William Booth Road off Anerley Road.

Trip generation and modal split: TfL considers the trip generation methodology and impact assessment to be acceptable. Furthermore, TfL is satisfied that the proposed development is unlikely to have a negative impact on the operation of the strategic highway network or public transport network.

Car parking: 242 car parking spaces are proposed, which equates to a car parking ratio of 0.96 spaces per unit. Whilst the provision proposed equates to slightly less than 1 space per unit, the London Plan states that 'all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit'. Given the sites good (3) to above average (4) PTAL and given existing car ownership levels within the surrounding ward (48%), TfL consider that the level of car parking proposed seems overly excessive for a modern day development. TfL would therefore encourage the developer to further reduce the on-site car parking provision.

Disabled parking and Electric Vehicle Charing Points (EVCP) including passive provision will be provided in accordance with the London Plan, which is welcomed by TfL.

A car club is proposed for the site, and up to two car parking spaces near to the site access will be allocated for car club vehicles. TfL support the provision of a car club and would also recommend that each household in the development is given 3 years free car club membership on first occupation to be funded by the applicant and secured by the s106 agreement.

Cycle Parking: 420 long-stay and 6 short-stay cycle spaces will be provided on site which is in accordance with the London Plan, and is welcomed by TfL. Short-stay spaces for visitors should be located within the public realm. All cycle parking spaces should also be easily accessible from cycle routes and appropriate signage, should be provided.

Travel Plan: A Residential Travel Plan has been produced, although it is noted that a copy of this has not been included on Bromley's planning application portal. TfL expects the final travel plan to be secured, monitored, reviewed, and enforced through the s106.

Freight and Servicing: A Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP) have been produced and the final detailed version should be secured by condition.

Mitigation: In accordance with London Plan policy 8.3, Community Infrastructure Levy, the Mayor commenced CIL charging for developments on 1st April 2012. It is noted that the proposed development is within the London borough of Bromley, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA). Further details can be found at: <http://www.london.gov.uk/publication/mayoralcommunity-infrastructure-levy>.

In summary, TfL welcome further discussions with the applicant and Bromley Council on car parking, car club membership and the travel plan.

Environmental Health:

Noise The site has generally moderate noise levels. Only very limited acoustic mitigations are necessary which can be covered by the following condition:

Details of a scheme of acoustic mitigation fully in line with the recommendations of the acoustic report (Grant Acoustics report reference GA-2015-0048-R1-RevA of 29th April 2016) shall be submitted to the Local Planning Authority for written approval prior to the development commencing. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

*Contamination*_The contamination report finds that the site is affected by various contaminants and further sampling and remediation is necessary to make the site suitable for the proposed use. K09 condition should be attached

*Air Quality*_No air quality assessment has been submitted for this development and the submitted document refers to a development in the London Borough of Haringey. An assessment is necessary in advance of determination of the application as this is a major development in the AQMA.

Conditions are highly likely to be required to control air quality impacts both during construction phase and also in respect of electric charging and other mitigations.

*Lighting*_The submitted details are acceptable but the development should be fully in accordance with the lighting calculation report.

I would recommend this is mandated by condition or a condition for later submission of final lighting scheme

*Informatives*_I would recommend that the following informative is attached:

Before works commence, the Applicant is advised to contact the Pollution Team of Environmental Health & Trading Standards regarding compliance with the Control of Pollution Act 1974 and/or the Environmental Protection Act 1990. The Applicant should also ensure compliance with the Control of Pollution and Noise from Demolition and Construction Sites Code of Practice 2008 which is available on the Bromley web site.

Additional Comments: In respect of the new assessment I have the following comments:

The assessment finds there will be 'a very minor increase in the annual mean NO₂ concentration at the selected sensitive receptors, with a magnitude ranging from 0.19 to 1.80%. The difference comparing the 'no development' and the 'with development' scenario for all receptors is considered to be *'negligible'* in accordance to the IAQM/EPUK guidance.' Consequently I do not object further on air quality grounds however I would recommend that the following conditions are attached to mitigate and minimise the impact, including cumulative impacts, as far as possible:

- An electric car charging point shall be provided to a minimum of 20% of car parking spaces with passive provision of electric charging capacity provided to an additional 20% of spaces.
Reason: To minimise the effect of the development on local air quality in accordance with Policies 6.13 and 7.14 of the London Plan
- All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used

during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/> Further information and guidance is available at <http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>

Reason: To protect local amenity and air quality in accordance with London Plan policies 5.3 and 7.14

- Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site (identifying efficiency and sustainability measures to be undertaken during construction of the development) has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

Reason: To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14 and to minimise the impact of construction activities on local air quality in accordance with London Plan Policy 7.14.

- Demolition works shall not begin until a dust management plan for protecting nearby residents and commercial occupiers from dust has been submitted to and approved in writing by the Local Planning Authority. The plan shall include details of demolition methods, all dust suppression measures and the methods to monitor emissions of dust arising from the development. The development shall not be carried out other than fully in accordance with the approved dust management plan.

Drainage: Reviewing the submitted Surface Water/SUDs Strategy carried out by iD Ltd dated April 2016, I note that attenuation is provided to restrict surface water run-off to 30l/s. I would like to highlight that the site has more potential for more SUDs to be incorporated to restrict surface water run-off to greenfield run-off rate.

Could the applicant consider the following:

- Although we are pleased to see green roofs being incorporated, we would like those green roofs to be extended to all the blocks and to be considered as a source control.
- Could the applicant consider the undercroft car park area as an over ground storage for extreme events.

Additional comments: Reviewing the submitted surface water strategy carried out by Infrastructure Design (iD) Ltd with issue 2 dated July 2016, I note the following:

- The proposed development will benefit from a selection of SUDs features including pond, green roofs and permeable paving.
- The combined pond and tank will provide 490m³.
- The discharge rate will be limited to 12l/s for all events including the 1 in 100 plus 30% climate change.

Please impose the following condition:

Prior to the first occupation of the development hereby approved drainage works shall be carried out in accordance with the submitted surface water strategy report carried out by Infrastructure Design (iD) Ltd with issue 2 dated July 2016. The approved works shall be carried out in strict accordance with the approved plan and document and shall be permanently retained in operational order thereafter.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties.

Thames Water:

Waste Comments

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit thameswater.co.uk/buildover

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

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We

would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.

Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Metropolitan Police Designing Out Crime Officer:

As you are aware, I have met with Fairview Estates previously in relation to this development, and this is noted on Page 62 of the Design and Access Statement. Unfortunately the security measures proposed are not enough for Secured by Design purposes and therefore I feel that the information provided does not go far enough to achieve Secure by Design standards, which is important, especially given the guidance within NPPF paragraphs 58 and 69 which state:-

Paragraph 58 of National Planning Policy Framework clearly states that local and neighbourhood policy should 'create safe and accessible environments where the fear of crime does not undermine quality of life or community cohesion.'

Paragraph 69 of this document 'promoting Healthy Communities' underlines this statement by encouraging the planning system to play an important part in facilitating 'safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'

This will be a major development in the Penge area, and I feel that should this application proceed, it should be able to achieve the security requirements of Secured by Design with the guidance of Secured by Design New Homes 2016 and the continued involvement of the South East Designing Out Crime Office. Secured by Design can be applied very successfully to this type of development and I also believe that the adoption of these standards will help to reduce the opportunity for crime and anti-social behaviour, creating a safer, more secure and sustainable environment.

Because I feel the development would be suitable to achieve Secured by Design accreditation, I would seek to have the agreed 'Secured by Design' condition attached to any permission that may be granted in connection with this application and that the wording is such that the development will follow the principles and physical security requirements of Secured by Design.

By the inclusion of such measures this development will satisfy the needs of local policy H7 (vii) and BE (viii) as well as demonstrating how such measures will be incorporated to minimise crime as contained in DCLG circular 01/2006 paragraph 8

Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October 2015 it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards, I would encourage the planning authority to note the experience gained by the UK police service over the past 26 years in this specific subject area.

That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.

I feel that the benefits of certified products should be pointed out to applicants and that the Local Authority encourages applicants to achieve this more appropriate standard. It is also important to note that policies relating to the design and layout of a new development, which aim to reduce crime and disorder, remain unaffected.

Historic England – Archaeology:

Recommend Approval of Archaeological Desk Based Assessment

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

The National Planning Policy Framework (Section 12 para 128) is most relevant. Having considered the archaeological desk-based assessment report prepared by CgMS Consulting Ltd dated May 2016 in respect of the above planning application pertaining to this site, I am happy to recommend its approval.

Recommend No On-Going Archaeological Interest

It is concluded that there is no discernible on-going archaeological interest with this site and that no further action should be taken at the pre-determination stage or by condition. Please note that this response relates solely to archaeological considerations.

Housing:

Having looked at their proposed amendments I have the following comments:

1. Clarification on the total number of habitable rooms which appears to be less than suggested.
2. 10% of wheelchair units are required and this should include 2 and 3 bed units.
3. The proportion of 3 bed AR units is high and there should be a greater proportion of 2 bed units to reflect the breakdown of need in the Borough.

Further comments:

We are satisfied with the mix of adapted units on the site. There needs to be a mix of 1, 2 and 3 bed adapted units rather than the 1 beds proposed. Is it possible to maximise the space in the 2 bed (so that there are two double bedrooms rather than a double and a single) that would be the more practical. The 2B wheelchair units should be 2 bed 4person as, they generally have more equipment etc. and need the extra space.

The split is better but should be one or two of the 1 bed w/chair units to general needs and make one or two of the 3 bed general needs units w/chair accessible.

Ignoring those that need step free access and partial adaptations there are currently:

- 22 x households needing 1B fully w/chair adapted accommodation.
- 25 x households needing 2B fully w/chair adapted accommodation.
- 24 x households needing 3B fully w/chair adapted accommodation
- 4 x households needing a 4B fully w/chair adapted accommodation.

Planning Considerations

In determining planning applications, the starting point is the Development Plan and any other material considerations that are relevant. The adopted Development Plan in this case includes the Bromley Unitary Development Plan (UDP) (2006) and the London Plan (March 2015). Relevant policies and guidance in the form of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) as well as other guidance and relevant legislation, must also be taken into account.

Relevant UDP policies:

H1 Housing Supply
H2 Affordable Housing
H3 Affordable Housing – payment in lieu
H4 Supported Housing
H7 Housing Density and Design
T1 Transport Demand
T2 Assessment of Transport Effects
T5 Access for People with restricted mobility
T6 Pedestrians
T7 Cyclists (see London Plan)
T9 Public Transport
T10 Public Transport
T12 Residential Roads
T15 Traffic Management
T18 Highway Safety
BE1 Design of New Development
BE4 Public Realm
BE7 Railings, Walls and Means of Enclosure
NE3 Nature Conservation
NE7 Development and Trees
NE12 Landscape Quality and Character
NE13 Green Corridors
G2 Metropolitan Open Land

G6 Land adjoining Green Belt and Metropolitan Open Land
C1 Community Facilities
C2 Community Facilities and Development
ER4 Sustainable and Energy Efficient Development
ER7: Contaminated Land
ER10 Light Pollution
ER15 Water Conservation
IMP1 Planning Obligations

Planning Obligations SPD

Affordable Housing SPD

Emerging Bromley Local Plan

A consultation on draft Local Plan policies was undertaken early in 2014 in a document entitled Draft Policies and Designations Policies. In addition a consultation was undertaken in October 2015 in a document entitled Draft Allocation, further policies and designation document. These documents are a material consideration. The weight attached to the draft policies increases as the Local Plan process advances.

Relevant Draft Policies and Designations (2014)

5.1 Housing Supply
5.3 Housing Design
5.4 Affordable Housing
5.11 Specialist and Older Peoples Accommodation
5.13 Renewal Areas
5.15 Crystal Place, Penge and Anerley Renewal Area
6.1 Community Facilities
6.3 Social Infrastructure in New Developments
6.6 Educational Facilities
7.1 Parking
7.2 Relieving congestion
7.3 Access to services for all
7.4 Highway infrastructure provision
7.5 Transport Investment Priorities
8.1 General design of development
8.4 Wildlife Features
8.6 Protection Species
8.7 Nature and trees
8.11 Landscape Quality and Character
8.13 Biodiversity and access to Nature
8.15 Metropolitan Open Land
8.18 Land Adjoining Green Belt or Metropolitan Open Land
8.25 Public Rights of Way and Other Recreational Routes
10.3 Reducing flood Risk
10.4 Sustainable Urban Drainage Systems
10.10 Sustainable design and construction
10.5 Contaminated Land

- 10.9 Light Pollution
- 10.10 Sustainable design and construction
- 10.11 Carbon reduction, decentralised energy networks and renewable energy
- 11.1 Delivery and implementation of the Local Plan

Draft Allocation, further policies and designation document (Sept 2015)

Chapter 5: Living in Bromley

Chapter 6: Supporting Communities

Chapter 7: Getting Around – Revised Draft Parking Policy

Relevant London Plan 2015 policies:

- 2.6 Outer London: vision and strategy
- 2.14 Areas for regeneration
- 3.1 Ensuring equal life chances for all
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Children and young people play and informal recreation facilities
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.12 Negotiating affordable housing
- 3.16 Protection and enhancement of social facilities
- 3.17 Health and social care facilities
- 3.18 Education facilities
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.8 Innovative energy technologies
- 5.0 Overheating and cooling
- 5.10 Urban Greening
- 5.11 Green roofs and development site environs
- 5.12 Flood Risk Management
- 5.13 Sustainable drainage
- 5.21 Contaminated Land
- 6.3 Assessing effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An Inclusive Environment
- 7.3 Designing Out Crime
- 7.4 Local Character
- 7.5 Public realm
- 7.6 Architecture
- 7.17 Metropolitan Open Land
- 7.19 Biodiversity and access to nature

8.2 Planning Obligations

8.3 Community Infrastructure Levy

The Mayors Housing SPG (2015) is also relevant

Policy guidance in the National Planning Policy Framework and Guidance are also relevant.

Relevant Paragraphs in the NPPF (2012)

Para 17: Core planning principles

Paras 29 - 41: Promoting sustainable transport

Paras 47 – 50: Delivering a wide choice of high quality homes

Paras 56 – 66: Requiring Good Design

Paras 69-78: Promoting healthy communities

Paras 93-103: Meeting the challenge of climate change & flooding

Paras 109-125: Conserving and enhancing the natural environment

Paras 188-195: Pre-application engagement

Paras 196-197: Determining applications

Paras 203-206: Planning conditions and obligations

Planning History

There are a number of applications relating to the existing buildings on site. However, the following applications are of most relevance:

07/02218 - Demolition of existing buildings and erection of two/three storey building to provide extension for young offenders institute (including basement accommodation) comprising 36 bedrooms with communal dining/living areas and classrooms/offices and ancillary facilities with additional car parking – Approved.

07/0264 – Single storey front extension – Approved

08/02691 – Two storey extensions to existing bedrooms – Approved

10/00879 – Three extensions attached to Wing A, B and C – Withdrawn

11/03514 – 6 single storey extensions – Approved

15/00346 – Retrospective application for the retention of 2 single storey extensions to wing B – Approved

Conclusions

It is considered that the main planning issues relating to the proposed scheme are as follows:

- Principle of development and loss of existing Community Use
- Density, Layout, Scale and Design
- Impact on adjacent Metropolitan Open Land (MOL)
- Affordable Housing
- Housing Standards
- Landscaping and Amenity
- Impact on Neighbouring Properties
- Highways and Transport
- Other Technical Considerations

Principle of development and loss of existing Community Use

The NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. Paragraph 15 of the NPPF identifies the presumption in favour of sustainable development and that development which is sustainable should be approved without delay. There is also a clear need for additional housing to meet local demand and needs.

Paragraph 49 of the NPPF clarifies that applications for housing developments should normally be approved for a change to residential use and any associated development from commercial buildings where there is an identified need for additional housing, provided there are not strong economic reasons why such development would be inappropriate. The Government's guidance to provide housing on brownfield sites is also likely to increase further with the intended revisions to the NPPF as identified in their consultation document.

The London Plan seeks mixed and balanced communities in accordance with Policy 3.9, which states that communities should be mixed and balanced by tenure and household income, supported by effective design, adequate infrastructure and an enhanced environment. Policy 3.3 establishes a housing target, whereas Policies 3.11 and 3.12 confirm that Boroughs should maximise affordable housing provision, where 60% of provision should be for social housing (comprising social and affordable rent) and 40% should be for intermediate provision where priority should be accorded to the provision of affordable family housing.

UDP Policy H1 requires the Borough to make provision for at least 11,450 additional dwellings over the plan period acknowledging a requirement to make the most efficient use of sites in accordance with the density/location matrix. As a brownfield site with vacant buildings, subject to being able to demonstrate that the site is no longer required for community use, increased housing provision could make a valuable contribution to the Borough's housing supply. However, it is necessary to demonstrate that an appropriate density can be achieved having regard to the context of the surroundings, standard of accommodation to be provided and detailed design considerations. It is noted that this proposal would represent a third of the Council's required housing allocation for a year. This should be afforded significant weight in the overall planning balance.

A recent appeal decision reference 3144248 concluded that the Council does not currently have the required 5 year housing land supply, and therefore this weighs in favour of granting permission for the provision of additional housing on this site in accordance with paragraphs 14 and 19 of the NPPF.

Policy C1 of the UDP, Draft Policy 6.1 of the LP and Policies 3.16 and 3.17 of the London Plan seek to prevent the loss of community facilities unless it can be demonstrated that there is no longer a need for them or alternative provision is to be made in an equally accessible location. As part of any proposal for redevelopment of the site, including a change of use to Class C3 residential, the requirements of these policies must be met and demonstrated and a Community Floorspace Assessment has been submitted in support of the application and identifies why the site is not required or suitable for community purposes as required under Policy C7.

The site was constructed and occupied for many years as a remand centre and was no longer required when such services were rationalised nationally. In more recent years the site was used as a residential institution caring for people with Autism, (which was an unauthorised use) but was no longer required due to changes in funding and care and this use vacated the site in July 2015. The site has been unused since and no subsequent use has been forthcoming.

London Plan policy 3.16 clarifies that “the suitability of redundant social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.” The applicants have submitted with their application a detailed and thorough assessment of existing facilities in the locality and whether there are any deficiencies which could be addressed. It has identified that there is a wide range of existing facilities and organisations across a wide area and has identified that there is no current deficiency in any sector. This process has not, therefore, identified a legitimate community use that would occupy the whole site and due to its size it would only be suitable for a small number of alternative uses. The fact there is no need for the existing facility, its buildings or the site for the original use for which it was intended or future alternative uses results in support for a redevelopment proposal for housing.

In addition the Mayor of London’s Social Infrastructure Supplementary Planning Guidance (SPG) 2015 notes that more efficient use of land by social infrastructure provision offers the opportunity to address housing and social infrastructure needs at the same time. It states that if it can be demonstrated that it is not practical or viable for the service/facility to continue operating for a community use it may be that a redevelopment could better optimise the site.

It is worth noting that the site has not been marketed, as the existing development was built for a specific purpose and it would be impractical to convert the buildings for an alternative community use. The submitted reports conclude that due to the nature and form of the buildings, their deterioration over the years and structural and construction issues, which includes asbestos materials any viable option for a school, health centre or other use would require a comprehensive redevelopment of the site. Consequently, due to the site and building constraints an alternative and financially viable use for the whole site is now being put forward.

The Community Floorspace Assessment and Addendum also clarify that the redevelopment for housing will deliver significant planning benefits to the wider area by redeveloping an underused site in an urban location and they have also put forward a contribution of £30,000

towards Anerley Town Hall and Crystal Palace Community Development Trust as the most appropriate way to address any loss of the community use on the site. This money can be used towards the upkeep of existing community services which already respond to local needs and identified deprivation in the wider area. The applicants are of the view that the long term objectives and established position of these organisations make a more appropriate contribution for local community needs and ensures a sustainable community resource to provide general facilities in the locality.

Furthermore the Councils Planning Obligations SPG also highlights the need to provide a wide range of community facilities, and existing community organisations and local partners should be the starting point for negotiations for any local community benefit to address any identified needs. The proposed contribution therefore complies with UDP Policies C2 and IMP1 and the Planning Obligations SPG

It is therefore considered that a strong case has been made which identifies why this proposed residential development should be supported in light of the relevant land use policy considerations identified and furthermore substantial additional weight, on balance, should be given to contributing towards the housing land supply in the Borough. All the above matters have been adequately addressed and justified and therefore, the principle of a residential use of this site should be supported in line with the relevant housing policies in the UDP, Draft Local Plan and London Plan.

Density, Layout, Scale and Design

The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Proposals must establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. London Plan and UDP policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design. UDP Policy BE1 sets out a list of criteria which proposals will be expected to meet, the criteria is clearly aligned with the principles of the NPPF as set out above.

The plans show the scale, mass, layout and the design of the proposed development with floor plans showing the size, level of occupation and mix of units within each block. Further perspectives of the development have been submitted to show the intended design approach including more detailed images to show the detailed design and expected features of the proposed buildings. The proposed plans provide detailed consideration of the relationship between the existing buildings around the site and the proposed buildings which are arranged in three blocks of flats, with the layout of parking areas, landscaping, pavements, communal spaces and refuse and cycle storage across the site.

Policy 3.4 in the London Plan seeks to ensure that development proposals achieve the optimum housing density compatible with local context, the design principles in Policy 7.4 and with public transport capacity. Table 3.2 identifies an appropriate residential density range related to a sites setting (assessed in terms of its location, existing building form and massing) and public transport accessibility (PTAL). For 252 units a density of approximately 140 dwellings and 439 habitable rooms per hectare is proposed, this is within the upper range of

the London Plan for an urban location. The site is within PTAL zone 3-4 with the majority being sited within PTAL 3 where there is a maximum range of 450 habitable rooms and 145 units per hectare. The parameters identified in the Density Matrix need to be taken into account, but these policies related to density are intended to optimise not maximise development with the priority that the site is well designed, providing a high quality environment for existing and future occupiers whilst respecting the spatial characteristics of the surrounding area, in particular the adjoining MOL.

The scale, form, layout and design of the proposed development is considered to be good and of a high quality. The site has the potential for a high density of units, with the height of buildings higher than existing and adjoining development. This is due to the site being on the edge of the existing built development, set back from its boundaries and without a specific street frontage. The site therefore does not need to rigidly fit in with an existing form of development and can be treated as being individual in character.

The design of the proposed buildings is also of a high quality with an innovative approach to the design being put forward. A relatively compact form of development is proposed which is concentrated towards the northern part of the site, whilst providing a more structured landscaped buffer/ amenity area towards the southern part of the site which results in an efficient use of the land and is considered to accord with policies H7 of the UDP and 3.4 of the London Plan.

The proposed site layout and design elements of the proposed buildings have been refined throughout the design process and include a number of well-considered aspects which contribute to the acceptability of the proposal. These include the incorporation of a frontage development for all ground floor flats with individual entrances and clearly defined communal entrance points. The relationship of parking and amenity areas has been separated and is well defined and the proposed cores to the buildings are small and are served by natural light and ventilation. In addition a high proportion of the units are dual aspect flats with no north facing single aspect units. The design and layout of the proposal is considered to be acceptable and in accordance with the above planning policies.

The design approach put forward for the redevelopment of this site for a large number of residential properties and how the various elements interrelate as a whole is therefore considered to result in a modern approach to the design of new residential communities. The layout of the site as a whole is considered to be well designed and accords with good urban design principles outlined in planning policies and guidance.

The proposal is still for a large central building (up to 6 storeys in height towards the western end) which forms a significant increase in the mass of development on the site. However, the scale and mass of the blocks have been stepped and staggered throughout and therefore the heights of the roof line vary across the proposed blocks. This breaks up the mass and form of the proposed buildings across the site and provides visual interest, visually breaking up the elevations. In addition, interest has been incorporated to the proposed elevations, with the introduction of different brick colours and brick detailing to provide relief and break up the long elevations of the different blocks. It is considered however that the introduction of a greater palette of materials and elevational treatment/details (such as a different material or a different form of its application to different parts of the elevations) would merit further consideration. Whilst the submitted design already incorporates a varied approach, this could be addressed through materials and building detail conditions.

Some detailed elements of the elevations have already been submitted with the application and give some indication to the design details being put forward however, it is considered necessary to condition most of these details to include reveals, balconies, window details etc. In addition an external materials and samples condition is also required.

The submitted Town and Visual Impact Assessment provides some context for the proposal and identifies the potential visual impact of the proposed development in the immediate area. This document clarifies that the impact of the development is limited within the context of the overall adjoining development and existing buildings and will not result in a negative visual impact on the character of the area. This is due to a detailed assessment of the character, building heights and form of existing buildings and proposing different heights of buildings across the site and setting the buildings off the site boundaries. The elevations are also of a brick construction, in keeping with the brick elevations of the adjoining buildings to the site. The proposal is therefore appropriate for the site and surroundings and is not considered to have a detrimental impact on the character of the immediate area.

In conclusion this design approach is considered an appropriate way forward in the context and character of the locality. This is an important factor but this should not restrict a different approach being taken on this site, for the reasons discussed above, and as a result it is reasonable to treat the application site on its own merits. The proposal would therefore complement existing development and enhance the overall design quality within the locality. The development complies with a significant number of design policies, whilst also taking into account the impact on adjoining residential developments and the MOL land which shall be discussed further below.

Impact on adjacent Metropolitan Open Land (MOL)

The site adjoins Metropolitan Open Land (MOL) which is afforded the same protection as the Green Belt. Policy G6 of the UDP seeks to protect the MOL from adjacent development and the impact on the visual amenities from the MOL need to be assessed in any consideration of the proposed development. In addition Policy G2 of the UDP, Draft Policies 8.15 & 8.18 of the Local Plan and Policy 7.17 of the London Plan are also relevant.

The proposal has given consideration to the adjoining MOL and its visual amenities by setting back the built form from the southern and south western corner of the site. The proposal is, however, for substantial buildings and a significant form of development close to the MOL which being set back a good distance from the boundary is considered sufficient to minimise the overall impact. The proposed communal/ amenity area /open space adjacent to the boundaries with the MOL also results in an improved site layout and visual connection with the MOL and overall a good use of this space. The proposed design also allows some views through the site, although limited. The impact is further reduced by proposed tree planting.

The Town and Visual Impact Assessment confirms the impact on the open landscape and on the visual amenities of the MOL land is acceptable and provides a context to the proposals and the wider area and includes views from within the land and the wider setting of the MOL. The proposal is therefore considered to be acceptable in terms of its impact on the MOL which has been minimised with the proposed layout and siting of the buildings that is considered to be in accordance with Policy G6 of the UDP.

Furthermore, the submitted drawings indicate the possibility of providing pedestrian links to the adjoining MOL land from the proposed development. Whilst this is positive and could be supported in principle given the potential improvement to permeability from the site and the MOL to the wider built environment, the ownership of the MOL has not been confirmed and there are questions over the deliverability of this element of the proposed scheme. Accordingly this has only been afforded limited weight in the overall consideration of the scheme.

Affordable Housing

The development provides affordable housing on site in accordance with Policy 3.11 of the London Plan and UDP Policy H2 by way of a planning obligation under Policy IMP1 of the UDP. Heads of Terms have been provided with the application with the accommodation schedule setting out which units are to be affordable, full details of tenure, size and mix with indicative details of a registered provider. A policy complaint scheme based on the proposed level of development should deliver 35% of habitable rooms as affordable, of which a 60:40 split of affordable rented and shared ownership is required.

London Plan policy requires new housing development to offer a range of housing choices in terms of the mix of housing sizes and types, taking into account the housing requirements of different groups. The proposal provides 1, 2 and 3 Bed Units of policy compliant sizes and information has been provided in respect of the level of occupation and tenure split which includes

The proposal provides a good variation of units which results in a good overall mix of unit sizes and is policy compliant. This has been amended since submission with a revision to the scheme being proposed and a significant increase in the provision of affordable rented accommodation on the site and a wider range of unit sizes. Affordable rented units include 1, 2 and 3 bed units and 1 and 2 bed shared ownership units. The 10% wheelchair units are now spread across both tenures, provided as both affordable rent and shared ownership.

The scheme provides a total of 72 affordable units, (43 Affordable Rent and 29 Intermediate).

The overall scheme has been designed to provide tenure integration and all affordable housing units located towards the western part of the site will have the same external appearance, design and entrance arrangements as the private housing. Further revisions have been suggested by the Council's Housing Team to increase the size of the two bed 4 person units and provide some 3 bedroom affordable rented wheelchair units. This request has been put to the Applicants, who have considered these aspects of the scheme. However the Applicants have advised that it would not be possible to accommodate these changes without increasing the size of all the proposed buildings on the site. Notwithstanding the above, the proposal submitted provides a policy compliant scheme from a planning perspective and an appropriate mix of unit sizes and an appropriate tenure split on site, whilst responding adequately to the housing needs of these groups. On this basis, the submitted scheme is acceptable and in accordance with planning policies and guidance in all regards. It is therefore supported in principle.

The proposed development therefore complies with Policy 3.11 of the London Plan and policy H2 of the UDP and is a fully compliant scheme in accordance with the Council's Affordable Housing Supplementary Planning Guidance Document.

Housing Standards

The Mayor's Housing SPG deals with the quality of residential accommodation, setting out baseline and good practice standards for dwelling size, room layouts and size, circulation space, storage facilities, floor to ceiling heights, outlook, daylight and sunlight, external amenity space (including cycle storage facilities) as well as core and access arrangements. Table 3.3 of the London Plan sets out the minimum space standards for new development and Annex 1 of the Housing SPG set out the current standards.

All of the proposed units meet the minimum standards in all respects and ensure that all baseline standards are met and units are capable of providing a good standard of accommodation throughout. Single aspect north facing units have been designed out of the proposal and single aspect flats are kept to a minimum with a high proportion of units being dual aspect. Internal circulation space in the cores benefits from natural light and ventilation and all proposed buildings would have access by lifts. The scheme therefore complies with housing standards and policy requirements in the London Plan.

Policies 3.5 and 3.8 of the London Plan require that all new housing should be built to high internal and external standards and that 10% of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The proposed development complies with this requirement.

Building Regulations Part M now form the technical basis for housing provision and wheelchair adaptability and units. It has been confirmed that the proposed wheelchair and affordable units comply with Part M 4(2) for the non-wheelchair dwellings & 4(3) for wheelchair user dwellings and this will need to be conditioned accordingly.

A Wheelchair and Accessibility section has been submitted in the Design and Access Statement to show that all units are designed in accordance with the above standards and also (where still applicable) the South East London Housing Partnership Wheelchair Homes Design Guidelines for affordable housing. This statement indicates which units are wheelchair adaptable and which units within the Affordable Housing provision are wheelchair units, along with allocated parking bays for these units and their proximity to their respective accommodation. All these details are considered to be acceptable.

In addition, 10% wheelchair provision has been provided across the market housing.

The plans submitted show full provision of the appropriate wheelchair standards and the design and layout has addressed this and the other required standards throughout.

Landscaping and Amenity

The landscaping of any large housing proposal is of key importance to the quality of the resulting development, the public realm and its perception and as such should be given considerable weight in the design process. The plans have given an emphasis on the landscaping across the site and given it the priority required for a site of this size. Mature landscaping and trees are proposed throughout and this assists in incorporating the proposal within the site as it integrates it within the wider locality and softens the impact of the increase of development and buildings on the site.

The inclusion of three principal communal amenity /open spaces within the proposal is a benefit and their purpose and intended use by the occupiers is defined. The proposed hard and soft landscaping design for the podium deck incorporates this element into the overall design of the development and it is noted that the soft landscaping is anticipated to be of a high quality. It is considered that the proposed landscaping has significant benefits to the overall design and layout of the site as a whole, in accordance with design and planning policies.

Nevertheless, conditions are necessary for detailed hard and soft landscaping details to be submitted for further consideration. Details are also required in respect of the children's play space, biodiversity measures and streetscape aspects.

The design of the ground floor units allows for the provision of their own entrances and useable amenity space which provides legibility and active frontages at ground level. The features of the principal elevations at ground floor and the proposed entrance arrangements to the upper flats further improves the overall legibility and character of the proposed development. This has been further enhanced by the inclusion of terraces at ground floor level on the podium deck. Boundary treatment to terraces/amenity areas will be important to provide security and privacy whilst retaining an active frontage which needs to be conditioned, as well as details of the proposed balconies.

Private amenity space is indicated as being provided for all units in the form of terraces, front gardens or balconies and complies with the requirements set out in the Housing SPG, including the incremental size in line with occupation. This aspect therefore complies with the relevant planning policies.

Impact on Neighbouring Properties

Policy BE1 of the UDP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

The site is fairly well contained and largely separated from neighbouring developments by virtue of the existing boundary treatments except for some of the properties in William Booth Road. Most of the existing residential development is also set back from the boundaries with either private gardens or access/circulation space in respect of the flats at Bodleian House, Carfax House and Radcliffe House. The boundaries and the existing residential developments adjacent are sensitive and consideration has been given to any potential impact. The proposed buildings are also set back from the boundaries, as a result of the proposed site layout and parking areas, which will help to reduce any impact by way of overlooking, loss of privacy or daylight/sunlight impact. A daylight and sunlight assessment has been submitted which confirms that there will be no noticeable impact on the daylight and sunlight to all neighbouring properties and existing amenities will be retained.

The closest dwellings to the application site are those located on the south-western side of William Booth Road which are sited a minimum of 24m from the proposed rear elevation of the closest proposed block of flats, where a 4 storey block of flats is being introduced in relative proximity to these dwellings, and where the existing built development on site is more limited

and of a smaller scale. However, it should be noted that some of these adjacent residential properties are already affected by an existing four storey building sited a similar distance from the boundary at the rear of Nos. 63/65 William Booth Road which was also used for residential accommodation.

The proximity of this scale of building and its potential impact on existing and perceived residential amenities by way of overlooking, loss of privacy and outlook has been considered and having regard to the separation distances and proposed landscaping of mature trees and shrubs between the two buildings it is not considered that the development would give rise to a significantly detrimental impact on existing residential amenities to justify a refusal of planning permission. Further details of the proposed planting and boundary treatments will need to be secured by appropriately worded conditions. It has therefore been demonstrated that the proposal would not cause significant harm to neighbouring residential amenities, including the submission of a daylight and sunlight assessment which addresses all existing residential properties and their private amenity areas. Overall, the impact on adjacent residential properties is minimised with limited overlooking or loss of privacy.

In terms of the increase in traffic movements and the additional noise and disturbance that this could generate, there will clearly be an increased level of noise and disturbance as a result of this proposal which is to be expected of a development of this size. However, given that this is a previously developed site which had and would have given rise to its own impacts in terms of traffic, including a greater proportion of commercial traffic serving the site it is considered on balance that the increase proposed is acceptable. In respect of the proximity of a car parking area to the rear of properties in William Booth Road and further impacts on existing residential amenities, a landscaped buffer is proposed along this boundary which would reduce the impact of additional activities and as discussed previously further details of the treatment to this boundary will be expected by condition.

It is therefore considered that the impact on existing residential amenities as a result of this proposal are, on balance, acceptable and the scheme complies with Policy BE1 of the UDP.

Highways and Transport

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. All developments that generate significant amounts of movement should be supported by a Transport Assessment. Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, safe and suitable access to the site can be achieved for all people. It should be demonstrated that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF clearly states in Paragraph 32 that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.

London Plan and UDP policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policies T1, T2, T3 and T18 of the UDP are relevant and car parking standards within the UDP should be used as a basis for assessment. The requirements for car and cycle parking laid out within Tables 6.2 and 6.3 of the London Plan and the subsequent amendments. In addition to the requirements of Policy 6.13 include that 1 in 5 spaces should provide electrical charging points.

Consideration should also be given to the location of the required 10% of wheelchair spaces and their proximity to the respective wheelchair accommodation. Cycle spaces should also be provided under these policies.

The proposed development has complied with the relevant requirements throughout, including the provision of electric charging points, 240 cycle spaces and appropriate storage facilities within the proposed buildings.

The site layout and submitted revisions to car parking provision across the site are supported and have a number of urban design and amenity benefits. The landscaping of these parking areas is also seen an important factor to minimise the visual impact of the number of spaces proposed. The revised level of parking provision is now at 98% which is slightly below the 1:1 ratio requested by Highways but more than required under the London Plan policies and that identified by the GLA and TfL. This slight under provision is considered to be addressed sufficiently by the measures proposed to minimise car use and the integration of Car Club facilities.

The submitted Transport Assessment and associated documents also show the likely trip generation in comparison to the existing use, with accompanying plans accurately showing the servicing strategy and swept path analysis, particularly in relation to the basement car parking areas. It includes an indicative Construction Management Plan, Service Delivery Plan and includes a Travel Plan. It concludes that the site is within easy walking distance to a number of local facilities including Anerley Train Station which limit the need to travel by car and measures have been put in place to minimise car use in the long term on the site.

These measures include 420 secure cycle parking spaces, the provision of access to a car club and the provision of car club spaces on site and the submission of a Residential Travel Plan.

The car club would be available to all new residents and existing residents within the locality and provides 2 cars (with the possibility of a 3rd) to be available with free membership for a 3 year period and a credit for mileage for all residents. This would therefore reduce the need for a car.

The submitted Travel Plan identifies a number of measures to increase the use of public transport, walking and cycling including up to date details of all services, timetables and routes. Packs will be provided to all new residents and a Travel Plan Co-ordinator will be available. This service will also be available online and on a centrally located noticeboard within the development site. These measures are therefore considered to significantly reduce the need for a car by residents.

These measures and the agreement to pay £25,000 to Highways towards a Traffic Study in the area are considered to reduce the need for a car for residents and justify the 98% provision of car parking spaces on-site. All of these elements are also to be tied into a s106 Legal Agreement to ensure their provision and retention on site. Discussions are also continuing in respect of securing that new residents would not be allowed to apply for a Residents Parking Permit in a future if a Controlled Parking Zone was to be implemented in the area. The mechanism by which this can be controlled is in the form of a 'Restricted Address Register' that would need to form part of the requirements of the Highways Contribution and a revised Travel Plan to advise future residents that they are unable to

apply for a permit. Both measures will need to be implemented and a revision to the wording of the Travel Plan has been requested.

For these reason it is not considered that on-street car parking is likely to be increased as a result of this development, even during peak school pick-up and drop-off hours. The site is in a sustainable location which limits the need to own a car and provides alternatives. Therefore the proposed car parking at 98% is acceptable on this occasion. The proposal therefore accords with planning policies in these regards.

Further, conditions can be imposed to require a more detailed Construction Management Plan, a Delivery and Servicing Plan and to secure the Travel Plan, car parking and cycle parking spaces.

The application site is accessed from William Booth Road, with a fairly narrow point of access into the site; this is a key issue in the redevelopment of the site. The applicants have advised that agreement has been reached with six separate and adjoining land owners in respect of widening the existing access road on to William Booth Road. This will result in the loss of 10 existing car parking spaces which shall be re-provided and allocated separately to the land owners within the development site. (These 10 spaces are in addition to the 246 car parking spaces). The proposal is to provide a 6.8-7.0m wide carriageway which has been agreed in principle with Highways, (the existing access being 4.8m). The impact on William Booth Road has been fully addressed and dealt with in the Transport Assessment. The works are not considered to result in any harm to residential properties adjoining the site or a harmful impact on visual amenities within William Booth Road. Further details of the works and surface materials, as well as their implementation, shall be required by condition.

With regard to refuse, internal bin storage areas are proposed at ground level within the proposed buildings. These bins, where necessary, will be moved to bin collection points on collection days by a Management Company.

In conclusion the highways aspects generated by the proposed development have all been adequately addressed and can be conditioned or dealt with in the s106 legal agreement and consequently are found to be acceptable and in accordance with planning policies.

Other Technical Considerations

Section 106 legal agreement

Policy IMP1 (Planning Obligations) and the Council's Planning Obligations SPD states that the Council will, where appropriate, enter into legal agreements with developers, and seek the attainment of planning obligations in accordance with Government Guidance. A Section 106 (S106) Legal Agreement is required. The draft Heads of Term have been agreed in principle and include:

- Affordable housing provision in line with policy requirements
- Provision of 10% wheelchair units
- Healthcare contribution of £284,508 towards Beckenham Beacon Clinical space
- Education contribution of £875,142.90 towards St John's CE Primary School
- Contribution towards community facilities at Anerley Hall (£30,000)

- Contribution towards a comprehensive traffic study within the vicinity of the site (£25,000)
- Car Club and Travel Plan
- Reimbursement of the Councils legal costs.

Trees and Ecology

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF addresses ecology in paragraph 109 which states, the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitments, which include establishing ecological networks that are more resilient to current and future pressures. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.

UDP Policies NE2, NE3 and NE5 seek to protect wildlife features and protected species requiring development proposals to incorporate appropriate mitigation where damage may occur. Policy NE7 requires proposals for new development to take particular account of existing trees and landscape features on the site and adjoining land.

There are a number of trees to the boundaries of the site which are to be retained where possible. A tree survey/arboricultural report has been submitted with the application which assesses these trees and identifies those trees to be retained which are of some merit. Two mature trees and a number of sampling groups are to be removed but overall most mature trees are to be retained and are within Category C except one Horse Chestnut which is a retained Category B tree and is sited on the boundary of the site. Most trees on the site offer little amenity value and are of poor quality. The proposed landscaping scheme and extensive tree planting proposed will largely off-set any losses and will result in a greater level of tree coverage and biodiversity enhancement. There is also an old conifer hedge to part of the southern boundary which is to be removed and replaced with native planting. The proposed landscaping scheme is part of the overall proposals being put forward and is integral to the design. This scheme would be dealt with by condition.

The ecological assessment identified limited use of the site by protected species and no habitats of significance. Mitigation measures identified use of native species in the landscaping scheme and clearance of potential bird nesting habitat outside of nesting season. However, it is also entirely appropriate for a development of this nature and scale to enhance opportunities for ecology and biodiversity as part of a detailed scheme (for example through the inclusion of bird/bat boxes, log piles etc.). Consequently, due to the size of the development being proposed details of the appropriate provision of such biodiversity features can be dealt with by condition. The proposed green roofs also add further to the enhancement of biodiverse features and habitats.

Drainage

The site is not in a Flood Zone but a Flood Risk Assessment (FRA) has been submitted due to the size of the site and a Drainage Statement which demonstrates how the principles of Sustainable Drainage Systems have been applied to the development in line with the guidance contained in the NPPF and the London Plan. The hierarchical approach to SUDS selection has been used at the investigation stage to help select the most sustainable

drainage techniques for the site. The proposed surface water drainage system has been significantly revised since submission and now includes a much greater proportion of green roofs and onsite attenuation. Land has been set aside specially for SUDS in the form of a dry pond to the south of the site and an underground attenuation tank for storm events. A tanked system has only been considered as all other options in the hierarchy are not possible. A condition to ensure full compliance with the drainage statement will be required.

Sustainable Development and Renewable Energy

The London Plan provides the policy framework in respect of sustainable construction and renewable energy, and in particular Chapter 5 of the London Plan (2015) and the Supplementary Planning Guidance entitled Sustainable Design and Construction. In addition, Policy BE1(vi) of the UDP, regarding sustainable design, construction and renewable energy is also relevant.

Policy 5.11 'Greens roofs and development site environs' requires major development proposals such as this to include green roofs. Living roofs provide an optimum environment for photo-voltaic panels as well as providing considerable benefits to a scheme in terms of ecology, sustainability and drainage.

The application is accompanied by an energy assessment which shows how the need for energy is to be minimised in accordance with the energy hierarchy. The development has been designed to use less energy; is to be supplied as efficiently as possible and should use renewable energy where feasible. The Energy Statement shows how the development will provide energy efficiency savings that exceed the requirements of the Building Regulations 2013 by 35.9% and includes calculations of both carbon dioxide emissions and energy (in KWh) and show how options for producing renewable energy have been considered.

The Energy Statement has demonstrated the feasibility of installing the particular measures proposed and concludes that a CHP Plant and Solar PV panels are the most appropriate renewable energy solutions.

A sustainability statement has been submitted to accord with Policy 5.3 "Sustainable Design and Construction" and demonstrates how the proposal will meet the minimum standards regarding sustainable design principles as set out in the Mayor's SPG. It also identified how it accords with Policy 5.6 "Decentralised Energy in Development Proposals".

Air Quality

An air quality report has been submitted which identifies only a marginal increase in air quality in the local area which overall would have a negligible impact. This has been assessed and the report is fit for purpose. A number of conditions are however recommended to ensure and address matters which could subsequently affect air quality and these would need to be added to any approval.

Contamination

A desktop Land Contamination Study and initial Site Investigations Report accompanies the application where some ground contamination has been identified and where further sampling will be required. A condition will need to be attached to any permission to secure a

contaminated land assessment and an appropriate remedial strategy in accordance with Policy ER7 of the UDP.

Secured by Design

The proposal should incorporate Secured by Design principles as required by Policy BE1 (vii) and H7 (vii) to take account of crime prevention and community safety. Paragraphs 58 and 69 of the NPPF are also relevant. Compliance with the guidance in Secured by Design New Homes 2014 and the adoption of these standards will help reduce the opportunity for crime, creating a safer, more secure and sustainable environment. A condition securing measures to minimise the risk of crime will need to be attached.

Children's play space

As family sized units are proposed London Plan policy 3.6 and the Mayor of London's Supplementary Planning Guidance "Providing for children and young people's play and informal recreation" requires suitable provision of a children's play space of 704.2 sqm. The formal play space proposed for young children will need to be fenced and is visible from within properties. Further details of this play space are to be submitted by condition, but it will need to be adaptable, imaginative and well integrated into the overall landscaping scheme. The formal play space has been provided at the south western corner of the site and is 604sqm and an informal play area of 1772sqm, further details will be required with the submission of details to include types of play equipment and age range.

Environmental Impact Assessment

As the development is proposing more than 150 dwellings it was necessary to "screen" the proposal as to whether it requires to be accompanied by an Environmental Assessment under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The process identified that no EIA was required and an opinion was issued on 3rd May 2016.

Conclusion

The proposed development is considered to result in a sustainable form of residential development on this brownfield site which complies fully with planning policies in all regards. The applicants have provided sufficient supporting information to address the relevant issues and have made revisions where necessary to overcome any concerns.

The provision of 252 additional units would make a significant contribution to the Council's 5 year Housing Land Supply.

The design and layout of the proposed development is modern, whilst respecting the character of the locality and minimising the impact on the MOL. Good urban design principles have been established throughout and the proposal complies with all the relevant housing standards and criteria.

A policy compliant affordable housing scheme is being provided and contributions made where required and in accordance with policy guidance and IMP1 of the UDP. The application is therefore recommended for approval.

Background papers referred to during the production of this report comprise all documents on files listed in the Planning History, excluding exempt information.

RECOMMENDATION: PERMISSION BE GRANTED (SUBJECT TO PRIOR COMPLETION OF A SECTION 106 AGREEMENT relating to Affordable Housing, 10% Wheelchair Units, Contributions towards Education, Health Care, Anerley Hall Community Facilities and Parking/Traffic Study, Car Club and legal costs) and any Direction by the Mayor of London

As amended by revised documents dated 25th and 27th July 2016

And subject to the following conditions:

1. The development to which this permission relates must be begun not later than the expiration of 3 years, beginning with the date of this decision notice.

REASON: Section 91, Town and Country Planning Act 1990.

2. The development hereby approved shall be carried out strictly in accordance with the application plans, drawings and documents as detailed below:

- Proposed Location Plan FNH417_1005 dated 05.05.2016
- Existing Site Plan FNH417_1002 dated 05.05.2016
- Existing Site Elevations 1 FNH 417_1003 dated 05.05.2016
- Existing Site Elevations 2 FNH 417_1004 dated 05.05.2016
- Proposed Site Plan FNH 417_1006 Rev B dated 07.07.2016
- Proposed first Floor Blocks D-G & N FNH417_1027 dated 05.05.2016
- Proposed First Floor Blocks H, J, K, L & M FNH417_1028 dated 05.05.2016
- Proposed Second Floor Blocks D-G & N FNH417_1029 dated 05.05.2016
- Proposed Second Floor Blocks H, J, K, L & M FNH417_1030 dated 05.05.2016
- Proposed Third Floor Blocks D-G & N FNH417_1031 dated 05.05.2016
- Proposed Third Floor Blocks H, J, K, L & M FNH417_1032 dated 05.05.2016
- Proposed Ground Floor Blocks D-G & N FNH417_1025 dated 05.05.2016
- Proposed Roof Plan FNH 417_1013 Rev A dated 07.07.2016
- Wheelchair adaptable Unit – Plot 45 FNH417_1060 dated 05.05.2016
- Wheelchair fully compliant Unit – Plots 2 & 30 FNH417_1061 dated 05.05.2016
- Wheelchair adaptable Unit – Plot 158 FNH417_1062 dated 05.05.2016
- Proposed Elevations FNH 417/1050 dated 05.05.2016
- Proposed Elevations FNH 417/1052 dated 05.05.2016
- Proposed Elevations FNH 417/1053 dated 05.05.2016
- Proposed Elevations FNH 417/1055 dated 05.05.2016
- Landscape Design Strategy FNH417 LS/01B dated 07.07.2016
- Landscape Design Strategy Internal Courtyard FNH417 LS/02 B dated 07.07.2016
- Landscape Design Strategy – Ground Level Layout FNH417 LS/03 dated 07.07.2016
- Design and Access Statement June 2016 dated 13.07.2016
- Town and Visual Impact Assessment April 2016 dated 05.05.2016
- Affordable Housing Statement 22 July 2016 dated 25.07.2016
- Daylight, Sunlight and Overshadowing Report 28th April 2016 dated 05.05.2016
- Transport Assessment and Appendices April 2016 dated 05.05.2016
- Transport – Supporting Letter and Email dated 04.08.2016
- Impact of Noise Sources on Proposed Residential Development 29th April 2016 dated 05.05.2016
- Archaeological Desk Based Assessment May 2015 dated 05.05.2016
- Geotechnical and Geoenvironmental Interpretative Report April 2016 dated 05.05.2016

- Air Quality Assessment 29 April 2016 dated 24.06.2016
- Level 2 Flood Risk Assessment 26.04.2016 dated 05.05.2016
- Ecological and Biodiversity Impact Assessment March 2016 dated 05.05.2016
- Sustainability Statement 29 April 2016 dated 05.05.2016
- Energy Statement 29.04.2016 dated 05.05.2016
- Foul Water, Surface Water and Utilities Assessment April 2016 dated 05.05.2016
- Statement of Community Involvement April 2016 dated 05.05.2016
- Arboricultural Report Part 1 Tree Survey and Part 2 Impact Assessment dated 05.05.1026
- Lighting Calculation Report April 2016 dated 05.05.2016
- Community Floorspace Assessment April 2016 dated 05.05.2016
- Addendum to Community Floorspace Assessment 6th July 2016 dated 13.07.2016
- Surface Water/SUDS Strategy July 2016 dated 04.08.2016
- Residential Travel Plan April 2016 dated 05.05.2016

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority when judged against development plan policies in the London Plan 2015 and UDP 2006.

3. Details of the proposed slab levels of the building(s) and the existing site levels shall be submitted to and approved in writing by the Local Planning Authority before work commences, (excluding demolition) and the development shall be completed strictly in accordance with the approved levels.

REASON: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the visual and residential amenities of the area.

4. Prior to the commencement of the development hereby permitted a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include measures of how construction traffic can access the site safely and how potential traffic conflicts can be minimised; the route construction traffic shall follow for arriving at and leaving the site and the hours of operation, but shall not be limited to these. The Construction Management Plan shall be implemented in accordance with the agreed timescale and details.

REASON: In order to comply with Policy T5, T6, T7, T15, T16 & T18 of the Unitary Development Plan and in the interest of the amenities of the adjacent properties and to minimise the impact of construction activities on local air quality in accordance with London Plan Policy 7.14.

5. Demolition works shall not begin until a Dust Management Plan for protecting nearby residents and commercial occupiers from dust and other environmental effects has been submitted to and approved in writing by the local planning authority. The plan shall include details of all dust suppression measures and the methods to monitor emissions of dust arising from the development. The development shall be carried out in accordance with the approved details.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the amenities of adjacent properties and the wider area.

6. Development should not be commenced, (excluding demolition) until Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine

the magnitude of any new additional capacity required in the system and a suitable connection point.

REASON: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

7. No part of the development hereby permitted shall be commenced (excluding demolition) prior to a contaminated land assessment and associated remedial strategy, together with a timetable of works, being submitted to and approved in writing by the Local Planning Authority.

a) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors, a proposed remediation strategy and a quality assurance scheme regarding implementation of remedial works, and no remediation works shall commence on site prior to approval of these matters in writing by the Authority. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment.

b) The approved remediation works shall be carried out in full on site in accordance with the approved quality assurance scheme to demonstrate compliance with the proposed methodology and best practise guidance. If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme submitted to the Authority for approval in writing by it or on its behalf.

c) Upon completion of the works, a closure report shall be submitted to and approved in writing by the Authority. The closure report shall include details of the remediation works carried out, (including of waste materials removed from the site), the quality assurance certificates and details of post-remediation sampling.

d) The contaminated land assessment, site investigation (including report), remediation works and closure report shall all be carried out by contractor(s) and approved in writing by the Local Planning Authority within 1 month of completion of the development.

REASON: In order to comply with Policy ER7 of the Unitary Development Plan and to prevent harm to human health and pollution of the environment.

8. Details of the proposed widening and amendments to the access road from William Booth Road to the site, to include footpaths, kerbs, relocation of car parking spaces, all hardsurfacing materials and a timescale for completion and/or stages of works shall be submitted to and approved in writing by the Local Planning Authority before work commences (excluding demolition) and shall be implemented as agreed in the details to be approved and retained in perpetuity.

REASON: In order to comply with Policies BE1 and T1 and T3 of the Unitary Development Plan and in the interest of the visual amenities of the area.

9. Details and samples of the materials to be used for the external surfaces of the building to include all joinery, glazing, lintels, reveals and balcony details and screens shall be submitted to and approved in writing by the Local Planning Authority before any above ground works are commenced. The works shall be carried out in accordance with the approved details.

REASON: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the appearance of the building and the visual amenities of the area.

10. Details of a scheme of hard and soft landscaping, which shall include planting schedules, the size and species of trees and plants, details of the proposed children's play area and equipment and the materials of paved areas and other hard surfaces, shall be submitted to and approved in writing by the Local Planning Authority before the commencement of the above ground works. The approved scheme shall be implemented in the first planting season following the first occupation of the buildings or the substantial completion of the development, whichever is the sooner. Any trees or plants which within a period of 5 years from the substantial completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species to those originally planted.

REASON: In order to comply with Policy BE1 of the Unitary Development Plan and to secure a visually satisfactory setting for the development.

11. Before above grounds works commence details of ecological enhancement measures across the site shall be submitted and approved and be fully implemented. This should including different types of bird boxes and feeding points, bat boxes and a Loggery for Stag Beetles and shall be retained thereafter.

REASON: In accordance with policy NE3 of the Unitary Development Plan and policy 7.19 of the London Plan.

12. Details of a scheme of acoustic mitigation fully in line with the recommendations of the acoustic report (Grant Acoustics report reference GA-2015-0048-R1-RevA of 29th April 2016) shall be submitted to the Local Planning Authority for written approval prior to the commencement of above ground works. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

REASON: In accordance with Policy BE1 of the Unitary Development Plan and Policy 7.15 of the London Plan 2015.

13. The development hereby permitted shall incorporate measures to minimise the risk of crime and to meet the specific needs of the application site and the development. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of the development hereby permitted, and implemented in accordance with the approved details. The security measures to be implemented in compliance with this condition shall seek to achieve the "Secured by Design" accreditation awarded by the Metropolitan Police.

Reason: In the interest of security and crime prevention and to accord with Policies H7 and BE1 of the Unitary Development Plan.

14. Details of the finished surfaces of the access roads and parking areas, which shall include all hard surfacing materials, lighting columns, bollards and any other street furniture shall be submitted to and approved in writing by the Local Planning Authority before commencement of works above ground level and the works shall be completed in accordance with the approved details before any of the dwellings hereby permitted are first occupied.

REASON: In order to comply with Policy H7 of the Unitary Development Plan and in the interest of the visual amenities of the area.

15. Prior to first occupation of the development hereby approved a scheme for any external lighting that is to be installed on the buildings, including measures to prevent light spillage and pollution, to include justification that the lighting is the minimum needed for security purposes shall be submitted to and approved in writing by the Local Planning Authority. Any external lighting as approved shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.

REASON: In order to minimise possible light pollution to the locality and to comply with Policy BE1 of the UDP.

16. Before any part of the development hereby permitted is first occupied boundary enclosures of a height and type to be approved in writing by the Local Planning Authority shall be erected in such positions along the boundaries of the site and private areas as approved and shall be permanently retained thereafter unless otherwise agreed by the Local Planning Authority.

REASON: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of visual amenity and the amenities of adjacent properties.

17. Prior to the first occupation of the development hereby approved drainage works shall be carried out in accordance with the submitted surface water strategy report carried out by Infrastructure Design (iD) Ltd with issue 2 dated July 2016. The approved works shall be carried out in strict accordance with the approved plan and document and shall be permanently retained in operational order thereafter.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties and to ensure satisfactory means of surface water drainage and to accord with Policy ER13 of the Unitary Development Plan.

18. Before any part of the development hereby approved is first occupied, bicycle parking shall be provided at the site in accordance with details hereby approved and shall be permanently retained thereafter.

REASON: In order to comply with Policy T7 and Appendix II.7 of the Unitary Development Plan and in order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport.

19. No part of the development hereby permitted shall be occupied until details have been submitted to and approved in writing by the Local Planning Authority of arrangements for establishment of a Car Club to serve the development. The approved arrangements for the Car Club shall be in operation before first occupation of any part of the development and shall be permanently retained thereafter.

REASON: In order to provide for the transport needs of the development and comply with Policies T3 and T18 of the Unitary Development Plan.

20. Before commencement of the use of the land or building hereby permitted parking spaces, basement parking and turning space shall be completed in accordance with the approved details and thereafter shall be kept available for such use and no permitted development whether permitted by the Town and Country Planning (General Permitted Development Order 1995 (or any Order amending, revoking and re-enacting this Order) or not shall be carried out on the land indicated or in such a position as to preclude vehicular access to the said land.

REASON: In order to comply with Policy T3 of the Unitary Development Plan and to avoid development without adequate parking provision, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

21. While the development hereby permitted is being carried out a suitable hardstanding shall be provided with wash-down facilities for cleaning the wheels of vehicles and any accidental accumulation of mud of the highway caused by such vehicles shall be removed without delay and in no circumstances be left behind at the end of the working day.

REASON: In the interest of pedestrian and vehicular safety and in order to comply with Policy T18 of the Unitary Development Plan.

22. The development shall be implemented in full accordance with the energy strategy assessment hereby approved which includes the provision of 35.9% CO2 emissions savings, use of a CHP and Solar PV Panels to achieve a reduction in carbon dioxide emissions of 33.5% and 2.1% respectively from on-site renewable energy generation.

REASON: In order to seek to achieve compliance with the Mayor of London's Energy Strategy and to comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.7 Renewable energy, 5.15 Water use and supplies in the London Plan (2015).

23. The arrangements for storage of refuse (which include provision for the storage and collection of recyclable materials) and the means of enclosure shown on the approved drawings shall be completed before any part of the development hereby permitted is first occupied, and permanently retained thereafter.

REASON: In order to comply with Policy BE1 of the Unitary Development Plan and in order to provide adequate refuse storage facilities and in the interests of visual amenity.

24. The scheme to light the access drive and car parking areas hereby approved shall be fully implemented in accordance with Lighting Calculations Report dated April 2016 before the development is first occupied and the lighting shall be permanently retained thereafter unless otherwise agreed with the Local Planning Authority.

REASON: In order to comply with Policy T3 and Appendix II of the Unitary Development Plan in the interest of visual amenity and the safety of occupiers of and visitors to the development.

25. Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no satellite dishes shall be installed on the elevations or the roof of the building without the prior written approval of the Local Planning Authority.

REASON: In order that the local planning authority may be satisfied with the details of the proposal and to accord with Policy BE1 in the Unitary Development Plan.

26. Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no plumbing or pipes, other than rainwater pipes, shall be fixed on the external elevations of the buildings hereby approved.

REASON: It is considered that such pipes would detract from the appearance of the building(s) and to comply with Policy BE1 in the Unitary Development Plan.

27. The proposed development shall be constructed and managed in accordance with the submitted Air Quality Assessment dated 29 April 2016 and the identified mitigation measures for demolition and construction activities. These measures shall be fully implemented throughout the proposed demolition and construction process.

REASON: To minimise the effect of the development on local air quality within an Air Quality Management Area in line with NPPF p124 and Policy 7.14 of the London Plan.

28. The green roofs hereby approved development shall be constructed in accordance with the plans hereby approved and maintained thereafter. The living roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. Evidence that the roofs have been installed as approved shall be submitted to and approved in writing by the local planning authority prior to the first occupation of the development hereby approved.

REASON: To comply with Policies 5.10 Urban greening, 5.11 Green roofs and development site environs, 5.12 Flood risk management, 5.13 Sustainable Drainage and 7.19 Biodiversity and access to nature conservation in the London Plan (2015)

29. The development hereby permitted shall be built in accordance with the criteria set out in Building Regulations M4(2) 'accessible and adaptable dwellings' for the units identified in the application as non-wheelchair units and shall be permanently retained thereafter.

REASON: To comply with Policy 3.8 of the London Plan 2015 and the Mayors Housing Supplementary Planning Guidance 2016 and to ensure that the development provides a high standard of accommodation in the interests of the amenities of future occupants.

30. The development hereby permitted shall be built in accordance with the criteria set out in Building Regulations M4(3) 'wheelchair user dwellings' for the units identified in the application as wheelchair units and shall be permanently retained thereafter.

REASON: To comply with Policy 3.8 of the London Plan 2015 and the Mayors Housing Supplementary Planning Guidance 2016 and to ensure that the development provides a high standard of accommodation in the interests of the amenities of future occupants.

31. The Travel Plan hereby approved shall be implemented in accordance with the agreed timescales and details contained within including its continued monitoring and shall not be varied without the prior approval of the Local Planning Authority.

REASON: In order to ensure appropriate management of transport implications of the development and to accord with Policy T2 of the Unitary Development Plan.

32. An electric car charging point shall be provided to a minimum of 20% of car parking spaces with passive provision of electric charging capacity provided to an additional 20% of spaces.

Reason: To minimise the effect of the development on local air quality in accordance with Policies 6.13 and 7.14 of the London Plan.

33. All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set

out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/> Further information and guidance is available at <http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>

Reason: To protect local amenity and air quality in accordance with London Plan policies 5.3 and 7.14.

Informatives

1. Before works commence, the Applicant is advised to contact the Pollution Team of Environmental Health & Trading Standards regarding compliance with the Control of Pollution Act 1974 and/or the Environmental Protection Act 1990. The Applicant should also ensure compliance with the Control of Pollution and Noise from Demolition and Construction Sites Code of Practice 2008 which is available on the Bromley web site.

2. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

3. You are advised that this application may be liable for the payment of the Mayoral Community Infrastructure Levy under the Community Infrastructure Levy Regulations (2010) and the Planning Act 2008. The London Borough of Bromley is the Collecting Authority for the Mayor and this Levy is payable on the commencement of development (defined in Part 2, para 7 of the Community Infrastructure Levy Regulations (2010)). It is the responsibility of the owner and /or person(s) who have a material interest in the relevant land to pay the Levy (defined under Part 2, para 4(2) of the Community Infrastructure Levy Regulations (2010)). If you fail to follow the payment procedure, the collecting authority may impose surcharges on this liability, take enforcement action, serve a stop notice to prohibit further development on the site and/or take action to recover the debt.

Further information about Community Infrastructure Levy can be found on attached information note and the Bromley website www.bromley.gov.uk/CIL

4. You should consult Street Naming and Numbering/Address Management at the Civic Centre on 020 8313 4742, email address.management@bromley.gov.uk regarding Street Naming and Numbering.

5. With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

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

7. Conditions imposed on this planning permission require compliance with Part M4 of the Building Regulations. The developer is required to notify Building Control or their Approved Inspector of the requirements of these conditions prior to the commencement of development.

8. All works to trees and clearance of vegetation should take place outside of the bird nesting season unless under supervision by a suitably qualified Ecologist.