

**Section '3' – Applications recommended for PERMISSION, APPROVAL or CONSENT**

**Application No :** 17/03674/FULL1

**Ward:**  
**Bickley**

**Address :** Durley Lodge, Bickley Park Road,  
Bickley, Bromley, BR1 2BE

**OS Grid Ref:** E: 542968 N: 169025

**Applicant :** Mr Smith

**Objections :** YES

**Description of Development:**

Demolition of existing dwelling and erection of 2.5 storey building, with accommodation in the roofspace, comprising of nine flats (5x one bedroom; 3x two bedroom; 1x three bedroom apartments), together with associated parking and landscaping

Key designations:

Smoke Control SCA 10

**Proposal**

The proposal is for the demolition of the existing detached house and the construction of a part/two three storey block of flats comprising of a total of nine units (made up of 5 one-bedroom flats, 3 two-bedroom flats, and 1 three-bedroom flats). The proposal includes 10 off-street parking spaces within the existing front garden area, whilst the existing site entrance will be unchanged.

The proposed block will incorporate a maximum width of approximately 22.5m and depth of 17.5m and it will rise to a maximum height of approximately 9.7m. Balconies will be provided at the front at ground and first floor levels, whilst the rear elevation will also incorporate balconies at ground, first and second floor levels with those at second floor levels inset within projecting gables. The proposed external treatment incorporates render and timber boarding.

The proposed building will match the design, appearance and scale of the proposal allowed on appeal under ref. 15/04152.

The application is accompanied by a Tree Survey, Construction Management Plan and Design and Access Statement.

A visit to the site confirms that the existing building has now been demolished and the replacement block is under construction.

## **Location**

The site occupies a 30m wide frontage to the northern side of Bickley Park Road, approximately 60 metres to the west of its junction with Blackbrook Lane and occupies an area of approximately 0.17h. Bickley Park Road forms a part of the A222 route. The site is presently occupied by a single detached two-storey house which incorporates accommodation within the roofspace and is broadly Mock Tudor in appearance.

The site includes a number of mature trees, particularly at the front and rear of the plot; the frontage is verdant in appearance, containing a number of trees and shrubs, which obscure much of the existing dwelling from the surrounding streetscene. The site adjoins 'Courtlands' to the north - made up of a detached two storey house, whilst the southern boundary adjoins an access drive which leads to the neighbouring house at 'Elmhurst' which occupies the land to the rear of the site. Beyond the access drive is the site of 'Red Tree Cottage' where works are currently in progress for the construction of a two storey building which will accommodate 5 two-bedroom flats.

The site falls within the Bickley Area of Special Residential Character (ASRC), which is described in the following terms in the Unitary Development Plan:

"The character of the area is essentially that of spacious inter war residential development, with large houses in substantial plots adjacent to the Conservation Areas of Chislehurst and Bickley."

This ASRC adjoins the Bickley Park Conservation Area which contains large residences on spacious plots, the design of a number of these having been inspired by the Arts and Crafts movement. Both the Conservation Area and ASRC share a number of similarities in terms of plot size and architectural styles.

## **Comments from Local Residents**

Nearby owners/occupiers were notified of the application and representations were received which can be summarised as follows:

- The original planning application to build 8 flats on the site was refused by the Council on the grounds of excessive development of an inadequately sized plot, inadequate vehicular access and loss of privacy of nearby properties. The application was then allowed on appeal. The reasons the Council refused planning permission for 8 flats are even more relevant to the building of a ninth flat on the site of Durley Lodge. Building a 9th flat represents a 12.5% increase in the number of households on the site with inadequate space for car parking and clear overdevelopment of the site. Building is already advanced and includes the first floor. I hope that Bromley Council denies permission to the proposal to increase the number of flats to nine.

## **Comments from Consultees**

Highways – The previous application was allowed at appeal. There was a highway issue with the access layout but prior to the appeal this was amended. This application is to provide 5 x 1 bed flats, 3 x 2 bed flats and 1 x 3 bed flat, an addition of a one and a two bed flat and a loss of a 3 bed flat from the previous proposal. The number of bedrooms (14) will therefore stay the same. There are now 10 parking spaces proposed. The property has an existing gated access. The gates will be removed and the access widened. No objections are raised subject to conditions.

TfL – The site of the proposed development is on A222 Bickley Park Road. Blackbrook Lane bus stop is located directly outside the development site. The Construction Management Plan (CMP) should be amended to ensure that no direct impact occurs on the Bus network from construction or services to the development. The CMP should outline measures to protect the bus stop. Any impact, damages or suspension costs must be covered by the applicant and agreed with TfL in advance. Subject to the above conditions being met, the proposal as it stands would not result in an unacceptable impact to the Transport for London Road Network (TLRN).

Drainage - The proposed use of a soakaway and permeable paving in the driveway and car park to store surface water run-off is acceptable. A standard condition is recommended.

Environmental Health (Housing) - The applicant is advised to have regard to the Housing Act 1985's statutory space standards contained within Part X of the Act and the Housing Act 2004's housing standards contained within the Housing Health and Safety Rating System under Part 1 of the Act, which apply to all residential premises.

Environmental Health (Pollution) – no objections raised subject to a standard informative.

## **Planning Considerations**

National Planning Policy Framework

London Plan Policies:

- 3.3 Increasing Housing Supply
- 3.4 Optimising Housing Potential
- 3.5 Design and Quality of Housing Developments
- 3.8 Housing Choice
- 5.1 Climate Change
- 5.2 Minimising Carbon Dioxide Emissions
- 5.3 Sustainable Design and Construction
- 6.9 Cycling
- 6.13 Parking
- 7.2 An Inclusive Environment
- 7.3 Designing out Crime

7.4 Local Character  
7.6 Architecture  
7.15 Noise  
8.3 Community Infrastructure Levy

The application falls to be determined in accordance with the following policies of the Unitary Development Plan and the London Plan:

BE1 Design of New Development  
H7 Housing Density and Design  
H9 Side Space  
H10 Areas of Special Residential Character  
T3 Parking  
T18 Road Safety  
NE7 Development and Trees

Supplementary Planning Guidance 1 General Design Guidance  
Supplementary Planning Guidance 2 Residential Design Principles

Emerging Bromley Local Plan

The Council is preparing a Local Plan. The submission of the Draft Local Plan was made to Secretary of State on 11th August 2017. These documents are a material consideration. The weight attached to the draft policies increases as the Local Plan process advances.

Draft Policy 1 - Housing Supply  
Draft Policy 4 - Housing Design  
Draft Policy 30 - Parking  
Draft Policy 32 - Road Safety  
Draft Policy 33 - Access for All  
Draft Policy 37 - General Design of Development  
Draft Policy 44 – Areas of Special Residential Character  
Draft Policy 69 – Development and Nature Conservation Sites  
Draft Policy 73 – Development and Trees  
Draft Policy 77 - Landscape Quality and Character  
Draft Policy 116 - Sustainable Urban Drainage Systems (SUDS)  
Draft Policy 123 - Sustainable Design and Construction  
Draft Policy 124 - Carbon Dioxide Reduction, Decentralise Energy Networks and Renewable Energy

### **Planning History**

Planning permission was refused under ref. 15/04152 for demolition of existing dwelling and erection of two storey building, with accommodation in the roofspace, comprising of eight flats (4x one bedroom; 2x two bedroom; 2x three bedroom apartments), together with associated parking and landscaping. The refusal grounds were as follows:

'The proposal, by reason of its excessive width, massing and site coverage, would constitute a cramped overdevelopment of the site, leading to an undesirable diminution in spatial standards of the Bickley Area of Special Residential Character, detrimental to its character and appearance, and contrary to Policies BE1, H10, H7 and H9 of the Unitary Development Plan and the Council's adopted Supplementary Planning Guidance 1 and 2.

The proposed means of vehicular access would fail to provide adequate clearance to enable vehicles to wait clear of the road while the gates are opening, or enable two cars to pass side by side adjacent to the site entrance, and will therefore be prejudicial to the free flow of traffic, contrary to Policy T18 of the Unitary Development Plan.

The proposed building, by reason of its 3rd floor balconies, would result in a loss of privacy and increased degree of overlooking into nearby properties (in particular Elmhurst to the rear), thereby contrary to Policy BE1 of the Unitary Development Plan.'

The application was subsequently allowed on appeal. The Inspector considered the architectural style of this part of the Area of Special residential Character to be mixed and concluded:

'The proposal would not therefore significantly depart from the spatial standards in this part of the ASRC, would not appear cramped in the street scene and would not materially erode the quality and character of the area. It would therefore comply with Policies BE1, H7, H9 and H10 of the UDP and the Council's adopted Supplementary Planning Guidance. These seek to ensure development does not detract from the existing street scene; the site layout, buildings and space about buildings complements the qualities of the surrounding area; retains adequate separation between buildings and, within an ASRC, respects and complements the established and individual quality of the area.'

The Inspector also concluded that the development would not impact harmfully on the amenities of neighbouring residential properties.

Under reference 03/02460, an application for a two storey side and rear extension and two-storey detached triple garage was refused at the enquiry site on the following grounds:

"The proposed two storey side extension would result in a cramped form of development harmful to the character and appearance of the dwelling and the Bickley Area of Special Residential character contrary to Policies E.1, H.3 and H.6 of the adopted Unitary Development Plan and Policies BE1, H8 and H11 of the second deposit draft Unitary Development Plan (September 2002)."

"The proposed two storey detached triple garage by reason of prominent siting and size would be an incongruous and obtrusive feature detrimental to

the visual amenities and character of the Bickley Area of Special Residential Character and contrary to Policies E.1, H.3 and H.6 of the adopted Unitary Development Plan and Policies BE1, H8 and H11 of the second deposit draft Unitary Development Plan (September 2002)."

Subsequently, under reference 03/03314, an amended application for a two storey side and rear and detached double garage with a room in the roof was granted planning permission. The two storey extension has been constructed.

## **Conclusions**

The main issues for consideration in respect of this proposal relate to the effect that it would have on the character and appearance of the Bickley Area of Special Residential Character (ASRC), with particular regard to the scale and form of the proposal; its effect on neighbouring amenity; the quality of the proposed landscape setting; and its effect on local highway conditions. The standard of accommodation for future occupants is also a consideration.

Following the allowed appeal under ref. 15/04152, the current application proposes to split the roof accommodation to provide 2 flats (1 two bedroom and 1 one bedroom). No external alterations are proposed.

### Impact on the Character of the Area of Special Residential Character

Policy H10 of the UDP advises that applications for development in the ASRCs will be required to respect and complement the established and individual qualities of the individual areas. This policy is supported by Appendix I of the UDP which sets out the criteria by which ASRCs have been designated:

- (i) There should be a sufficient number of properties to form an area of distinctive character. The area should be well established, readily identifiable and coherent.
- (ii) The majority of properties should generally have the same readily identifiable characteristics (e.g. high spatial standards, similar materials, well landscaped frontages).
- (iii) The boundary should be easily defined and defensible.
- (iv) The areas defined should be primarily residential in character.

Appendix I further states that, when considering applications for new development in ASRCs, the Council, as well as applying the general housing policies in Chapter 4 of the UDP, will seek a number of development control guidelines for such areas, including the following:

- Developments likely to erode the individual quality and character of the ASRCs will be resisted. Reference will be made to the description of areas given below for a determination of individual quality and character.
- Residential density shall accord with that existing in the area.
- Spatial standards of new development (plot width, garden depth and plot ratio) shall accord with the general pattern in the area.
- The general height of existing buildings in the area shall not be exceeded.

- The space between a proposed two or more storey development and the side boundary of the site should accord with that prevailing in the area.
- Existing mature trees and landscaping shall be retained wherever possible.

In terms of local character, the initial stretch of Bickley Park Road, between its junctions with Southborough Road and Blackbrook Lane, contains a mix of uses, but most of the sites here are made up of individual family houses of varied size and appearance, many of which are set within generous plots, helping to define this ASRC. These houses are interspersed by Bickley Park Cricket Club, St George's Church and Lauriston House residential home. The flatted development along this road is confined to the locally listed building at Farrants Court which comprises a former mansion set within substantial grounds which has been subdivided into ten flats; and the site of Red Tree Cottage where a block of 5 flats is under construction but whose outward appearance is comparable to that of a detached house.

Taking account of the site characteristics and the nature of the proposal, it is considered that the proposed scheme will respect the spatial standards of the ASRC and this view has previously been taken by the Inspector. The current application does not propose alterations to the external appearance of the allowed building, with only internal alteration proposed to provide a ninth flat. It is therefore considered that the proposal would not impact harmfully on the special character of the ASRC.

#### Impact on Neighbouring Amenities

Whilst objections have been raised in respect of potential overlooking and loss of privacy, taking account the site characteristics and the relationship between the proposed building and surrounding properties it is not considered that this proposal will lead to a diminution in the level of amenity currently enjoyed by residents of surrounding properties. In respect of the neighbouring dwelling at 'Elmhurst', situated to the north of the application site, a separation of between approximately 20m and 30m will be maintained between the rear elevation of the proposed building and the boundary with that site, whilst there is a significant level of existing boundary planting; as such, it is not considered that the impact of this proposal will be significant as such to justify refusal. In the case of 'Courtlands' which is situated to the east, the proposed building will maintain a wider separation than the existing house of up to 4.1m, whilst only two windows will be provided along the western flank elevation of the proposed building, both of which will be obscure glazed. On this basis, it is not considered that the proposal will undermine the existing levels of amenity which presently exist. It should also be noted that this view has previously been shared by the Inspector

#### Density and Standard of Accommodation

With regard to the density of the proposed development, Table 3.2 of Policy 3.4 (Optimising Housing Potential) of the London Plan (2015) gives an indicative level of density for new housing developments. In this instance, the proposal represents a density of 52 dwellings per hectare with the table giving a suggested level of

between 50-95 dwellings per hectare in suburban areas with a PTAL rating of 3. The proposals would therefore result in a suitable density level for the site.

The London Plan suggests that the minimum size of a one bedroom two person flat should be 50 sq.m and a two bedroom four person flat should be 70 sq.m. A three bedroom five person unit should have a GIA of 86 sq.m. The submitted plans indicate a floor area of between 53 sq.m and 120 sq.m for the proposed flats and therefore the dwellings are considered to comply with the requirements of the Technical Space Standards.

The proposal will provide suitable bedroom sizes, living areas, natural light and communal amenity/play space to the rear of the building. Each flat will be provided with a private terrace, with the three bedroom unit provided with two terraces. It is considered that the standard of accommodation provided for future occupants would be suitable.

### Parking and Highway Safety

The previous application was allowed at appeal. There was a highway issue with the access layout but prior to the appeal this was amended. This application is to provide 5 x 1 bed flats, 3 x 2 bed flats and 1 x 3 bed flat, an addition of a one and a two bed flat and a loss of a 3 bed flat from the previous proposal. The number of bedrooms (14) will therefore stay the same. There are now 10 parking spaces proposed. The property has an existing gated access. The gates will be removed and the access widened. No objections are raised from a highway safety perspective, subject to conditions.

### Summary

Having had regard to the above it was considered that the siting, scale and design of the proposed development is acceptable in that it would not result in a significant loss of amenity to local residents nor impact detrimentally on the character of the ASRC. The proposal would also have no significant impact on the amenities of neighbouring properties and would provide an acceptable standard of accommodation for future occupants. No impact on highway safety or trees would result and therefore it is therefore recommended that Members grant planning permission.

Background papers referred to during production of this report comprise all correspondence on the file refs. 15/04152 and 17/03674 as set out in the Planning History section above, excluding exempt information.

**RECOMMENDATION: PERMISSION**

**Subject to the following conditions:**

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this decision.**

**Reason: Section 91, Town and Country Planning Act 1990.**



- 2** The development hereby permitted shall not be carried out otherwise than in complete accordance with the plans approved under this planning permission unless previously agreed in writing by the Local Planning Authority.

**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.

- 3** Details of the materials to be used for the external surfaces of the building shall be submitted to and approved in writing by the Local Planning Authority before any work is 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.

- 4** Details of a scheme of landscaping, which shall include 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 development hereby permitted. 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.

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

- 5** If any trees are felled in order to implement the development hereby permitted, trees of a size and species to be agreed in writing by the local planning authority shall be planted as replacements in such positions as shall be agreed by the authority in the first planting season following completion of the development. Any trees which within a period of 5 years from the 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.

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

- 6 Arboricultural works shall take place strictly in accordance with the Tree Survey by LaDellWood LLP.**

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

- 7 No development shall take place until details of drainage works have been submitted to and approved in writing by the local planning authority, and drainage works shall be carried out in accordance with the approved details prior to first use of any dwelling. Prior to the submission of those details, an assessment shall be carried out into the potential for disposing of surface water by means of a sustainable drainage system in accordance with the principles of sustainable drainage systems, and the results of the assessment provided to the local planning authority. Where a sustainable drainage system scheme (SuDS) is to be implemented, the submitted details shall:**

**i) provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;**

**ii) specify the responsibilities of each party for the implementation of the SuDS scheme, together with a timetable for that implementation; and**

**iii) provide a management and maintenance plan for the lifetime of the development, which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.**

**The scheme shall be implemented, maintained and managed in accordance with the approved details.**

**Reason: To ensure satisfactory means of surface water drainage.**

- 8. Before commencement of the use of the land or building hereby permitted parking spaces and/or garages 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 or garages indicated or in such a position as to preclude vehicular access to the said land or garages.**

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

- 9. 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.**

- 10. Details of a scheme to light the access drive and car parking areas hereby permitted shall be submitted to and approved in writing by the Local Planning Authority before the development hereby permitted is commenced. The approved scheme shall be self-certified to accord with BS 5489 - 1:2003 and be implemented before the development is first occupied and the lighting shall be permanently retained thereafter.**

**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.**

- 11. 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, including any conflicts with the bus network; 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.**

- 12. Surface water from private land shall not discharge on to the highway. Details of the drainage system for surface water drainage to prevent the discharge of surface water from private land on to the highway shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of works. Before any part of the development hereby permitted is first occupied, the drainage system shall be completed in accordance with the approved details and shall be retained permanently thereafter.**

**Reason: In order to ensure the satisfactory drainage of the site and in the interest of highway safety.**

- 13 Arrangements for the storage of refuse and recyclable materials (including means of enclosure for the area concerned) shall be completed before any part of the development hereby permitted is first occupied in accordance with details to be submitted to and approved in writing by the local planning authority. The approved arrangements shall be 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 in a location which is acceptable from the residential and visual amenity aspects.**

- 14 Before any part of the development hereby permitted is first occupied, bicycle parking (including covered storage facilities) shall be provided at the site in accordance with details to be submitted to and approved in writing by the local planning authority, and the bicycle parking/storage facilities 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.**

- 15 Details of existing site levels and proposed slab levels of the buildings hereby permitted shall be submitted to and approved in writing by the local planning authority before any development commences on site. The development shall then 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.**

- 16 Before any part of the development hereby permitted is first occupied boundary enclosures of a height and type to be submitted to and approved in writing by the local planning authority shall be erected in such positions along the boundaries of the site as shall be approved and shall be permanently retained thereafter.**

**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 Before the development hereby permitted is first occupied, the kitchen/dining room windows on the ground and first floor western elevation and the side of the first floor balconies on the western**

elevation shall be obscure glazed and shall subsequently be retained as such at all times.

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

You are further informed that:

- 1 You are reminded of your obligation under Section 80 of the Building Act 1984 to notify the Building Control Section at the Civic Centre six weeks before demolition work is intended to commence. Please write to Building Control at the Civic Centre, or telephone 020 8313 4313, or e-mail: [buildingcontrol@bromley.gov.uk](mailto:buildingcontrol@bromley.gov.uk)
- 2 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](http://www.bromley.gov.uk/CIL)

- 3 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.

If during the works on site any suspected contamination is encountered, Environmental Health should be contacted immediately. The contamination shall be fully assessed and an appropriate remediation scheme submitted to the Local Authority for approval in writing.

- 4 You are advised to apply to the Highway section for the works to the dropped kerb. The application form is on the Council's website or if they have any queries or want to do the work themselves under licence they should contact Daniel Gordon ([daniel.gordon@bromley.gov.uk](mailto:daniel.gordon@bromley.gov.uk)).**