

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

Application No : 19/01263/FULL1

Ward:
Plaistow And Sundridge

Address : Allum House, 92 Plaistow Lane,
Bromley BR1 3HU

Objections: Yes

OS Grid Ref: E: 541061 N: 169928

Applicant : Sirca Ltd.

Description of Development:

Demolition of existing building. Erection of building containing 10 flats, with associated new highway access, vehicle parking, cycle parking, refuse store and communal amenity space.

Key designations:

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Open Space Deficiency
Smoke Control SCA 10

Proposal

Planning permission is sought for demolition of the existing building and erection of a three storey block with further roof accommodation (total four floors) containing 10 flats.

The application is supported by the following documents:

- Application forms,
- Application drawings,
- Planning Statement,
- Design and Access Statement,
- Schedule of Accommodation,
- Accessible/Adaptable Homes Statement,
- Sun and daylight assessment,
- Air Quality Assessment,
- Sustainability and Energy Statement,
- Transport Statement,
- Arboricultural Report, Tree Survey and Tree Protection Plan,
- Geo-Environmental (potential ground contaminants) Study,
- Flood Risk Assessment and Sustainable Drainage Scheme,
- Noise Impact Assessment

Location and Key Constraints

The site is Allum House No. 92 Plaistow Lane, Bromley, detached a 2-3 storey Edwardian/Victorian style dwelling located on the northern side of the highway, close to St. Joseph's RC Church, and accessed via a carriage type driveway. The building most recently appears to be occupied by an institution/organisation described in the PINS decision (2012) as 'move-on accommodation' a part of the process for re-settling homeless people in to formal/permanent accommodation. The surrounding area is predominantly residential, but it includes a number of community services and facilities within reasonable walking distance of the site, and No. 94 appears to be in use as a family centre. As mentioned by the Planning Inspector whilst the origins of the area date from the 19th Century-early 20th Century it has more recently been subject to change and redevelopment; including a sizeable flatted block at the neighbouring property No. 90B as well as some more modest traditional dwellinghouses. The Inspector also noted the presence of large mature street trees mainly along the southern stretch of Plaistow Lane, whereas along the northern side (in the vicinity of the application site) trees and other prominent landscaping is generally set more within property boundaries and in fact the buildings are more prominent.

Planning History

The relevant planning history relating to the application site is summarised as follows:

12/03294/FULL1 – Demolition of existing building and erection of three storey block to provide 12 one bedroom flats (100% affordable) with 6 forecourt car parking spaces was refused by the Planning Committee on 10 January 2013 for the following reason:

1. *The proposal would be an overdevelopment of the site with inadequate car parking which would also result in the loss of two trees and would therefore be harmful to the character and appearance of the area, thereby contrary to Policy BE1 of the Unitary Development Plan.*

The corresponding planning appeal was also dismissed by the Planning Inspectorate on 14 October 2013 for the following reason(s):

- *The proposal would harm the living conditions of the present and future occupiers of the adjacent property No. 90B Plaistow Lane by reason of overshadowing and overlooking, and or/in combination with any proposed mitigation measures (obscure glazing) would detract from the living conditions of the future occupiers in the appeal scheme.*

The Inspector particularly noted the narrowing and inward facing angle between the proposed building and No. 90B; and the approximately 6.0m depth and 3 storey height of the rearward projecting gable ended element and the harmful overshadowing upon the amenities of No. 90B and its amenity space. The north facing windows would have harmed the privacy amenities of neighbouring occupiers at No. 90B whilst using obscure glazing would have harmed the outlook amenities of the future occupiers.

Despite the increased size of the replacement building the Inspector considered that the gable and stepped arrangement of the façade would have reflected the smaller scale of properties elsewhere in the wider context and contribute to the visual interest of the street scene. The Inspector also felt that given the set back from Plaistow Lane; the proposed 12m high main roof and 13.1m high maximum ridge height proposal would be in keeping with the overall roof line for this group of properties including the immediately adjacent Nos. 90B and 94. The Inspector felt that the increased width of the replacement building

would reduce the visual gaps with adjacent properties but that there was sufficient separation so it would nevertheless integrate satisfactorily with the street scene and would not detract from the listed building opposite. The Inspector did not object to the removal of two trees in the rear and furthermore that suitable landscaping could have been secured by condition. Overall the Inspector did not object to the impact of the development on the area's character and appearance.

Overall the Inspector considered there to be a lack of compelling evidence to clearly demonstrate that the proposal would result in increased demand for on-street car parking that would be significantly different from the present circumstances so as to be harmful to highway safety and did not raise an objection in this regard.

18/03790 – Demolition of the existing building and erection of a three storey block with further roof accommodation (total four floors) containing 9 flats, along with associated highway access, vehicle parking, cycle parking, refuse store and communal amenity space was refused for the following reason:

1. *The proposed development would provide insufficient on-site parking leading to additional on-street parking which would be harmful to the amenities of the future residents and prejudicial to highway safety the free flow of traffic along the public highway and contrary to Policies T3 and T18 of the Unitary Development Plan 2006 and Policies 30 and 32 of the Bromley Submission Draft Local Plan 2017.*

In considering the subsequent appeal the Appeal Inspector noted the following points:

- the location of the site and the low PTAL 2 rating indicating a higher reliance upon private transport and a likelihood for higher car ownership in the general area,
- although notwithstanding the low PTAL rating the Inspector also noted:
 - vehicle ownership tends to be lower in flatted development
 - there are nearby bus stops and railway stations,
 - the site is relatively close to the Bromley Town Centre,
 - the Appellant's submitted parking survey; which identified on-street parking capacity within a 200m walking radius of the site, that the on-street parking spaces would not be prejudicial to highway safety nor that walking to the on-street parking spaces would be significantly harmful to the living conditions of the future occupants.

On this basis the Appeal Inspector consequently concluded that in these circumstances the proposal could justify a lower level of off-street parking within the site and resolved to allow the appeal. It does not appear that the appeal scheme has been implemented however nonetheless it remains an extant permission which could be implemented in the event that the current application is unsuccessful and this is a material planning consideration to which appropriate weight will be attributed.

Policy Context

Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

The development plan for Bromley comprises the London Plan (March 2016) and the Bromley Local Plan (January 2019). Since the previous decision 18/03790/FULL1 the Bromley Unitary Development Plan (2006) has been replaced by the Bromley Local Plan (2019). Notwithstanding this the previous scheme was determined in relation to both the former UDP Policies and the now formally adopted Bromley Local Plan Policies and therefore the Development Plan Policies remain consistent. The NPPF does not change the legal status of the development plan.

The application shall be determined in accordance with the following policies:

London Plan Policies

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Children and young people's play and informal recreation facilities
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.13 Sustainable drainage
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.1 Building London's Neighbourhoods and Communities
- 7.2 An Inclusive Environment
- 7.3 Designing out Crime
- 7.4 Local Character
- 7.5 Public Realm
- 7.6 Architecture
- 7.8 Heritage Assets and Archaeology
- 7.19 Biodiversity and access to nature
- 7.21 Trees and Woodlands

Bromley Local Plan

- Policy 1 Housing Supply
- Policy 4 Housing Design
- Policy 8 Side space
- Policy 20 Community Facilities
- Policy 30 Parking
- Policy 32 Road Safety
- Policy 37 General design of development
- Policy 38 Statutory Listed Buildings
- Policy 72 Protected species
- Policy 73 Development and trees

Supplementary Planning Guidance

Bromley's SPG No.1 – General Design Principles

Bromley's SPG No.2 – Residential Design Guidance

Mayor of London SPG – Homes for Londoners Affordable Housing and Viability 2017

Comments from Local Residents and Groups

Nearby owners/occupiers were notified of the application and no representations were received.

Comments from Consultees

Environment Agency: The application site does not lie within an EA Flood Zone 2 or 3 (the areas with highest risk) and the proposed development is assessed as having low environmental risk and the Environment Agency has no further comments to make.

LBB Drainage Engineer: It has been provisionally agreed with Herrington Consulting that surface water run-off would ideally be discharged into a SuDS and only if this is not feasible that it would be discharged into the public foul sewer subject to agreement with Thames Water. The submitted surface water drainage strategy should include an option to store all surface water run-off on site for events including the 1 in 100 year plus 40% climate change.

The amended FRA and SuDS is acceptable however notwithstanding this, the developer would need to carry out a soakage test in order to determine a suitable surface water drainage option. As such the drainage for the site can be managed by a surface drainage planning condition requiring detailed information to be submitted before the commencement of the development (PC06).

LBB Environmental Health Pollution Officer: No objection subject to the recommended conditions (submission of contaminated land assessment, the recommendations of the Air Quality Assessment to be followed, boilers to meet the dry NOx emission rates and provision of electric vehicle charging points) and informatives (compliance with the Pollution Team of Environmental Health & Trading Standards regarding compliance with the Control of Pollution Act 1974 and/or the Environmental Protection Act 1990 and the Council's Control of Pollution and Noise from Demolition and Construction Sites Code of Practice 2017).

LBB Environmental Health Housing Officer: No comments received

LBB Highway Department: Plaistow Lane is a classified and Local Distributor road; subject to a 30mph speed limit and often busy throughout most of the day. According to TfL's WebCAT planning tool the site is located in an area with a PTAL rating of 2 (on a scale where 0 has the worst/least access to public transport services and 6b has the best/most access to public transport services). There are double yellow lines located along the side of Plaistow Lane directly fronting the Application Site and unrestricted on-street parking on the opposite side from the application site.

The current revised proposal seeks permission to demolish the existing Victorian dwelling and to construct 10 apartments, comprising one 1-bed unit, eight 2-bed units, and one 3-bed unit. Vehicular and pedestrian access to the site will remain via Plaistow Lane.

There is an existing carriage style access on to the public highway. It is proposed to replace this with a single centrally located entry and exit point on to the highway with

dropped kerbs and tactile paving provided to accommodate passing pedestrian movements. The existing access points should be reinstated to footway level.

It is proposed to provide visibility splays of 2.0m x 43m in accordance with Manual for Streets (MfS), and this would be acceptable according to the 30 mph speed limit.

The proposed 10 residential units would have the following mix:

- 1x 1-bedroom,
- 8x 2-bedrooms,
- 1x 3-bedrooms

The 10 proposed car parking spaces shown on the submitted plan would be satisfactory. Given the Local Distributor status of the road and its fairly high traffic volume any front boundary gates would be likely to impede/hinder access and/or visibility. The proposed gates would be positioned at the undercroft beneath the building and well set back from the highway and the front boundary wall/railings would be low and providing they would not exceed 1m then this would provide sufficient visibility. The 6m wide highway entrance would allow two vehicles to pass through simultaneously. Subject to this (and the following recommended conditions) there would be no highway objection, subject to the recommended conditions/informatives.

Conditions

PC14 Turning area

PC17 Construction Management Plan

AG11 Refuse storage

AG12 Cycle parking

AG13 Lighting scheme for parking area

AG14 Travel Plan

OC03 Satisfactory parking

OC04 Stopping up of access

OC06 Remove residents' parking permits

ND15 Vehicle and Pedestrian Visibility splays

ND16 Wash-down facilities

Solid material/surface for parking/turning areas

Informatives

Works to a vehicle crossover/access,

Relocation of street furniture/Statutory Undertaker's apparatus,

Electric vehicle charging points,

LBB Planning Policy Sustainable Construction: The adopted Local Plan 2019 Policy 124 refers to Policy 5.2 of the London Plan (2016) which at the time required a minimum target of 35% on-site reduction in CO₂ emissions beyond the 2010 Building Regulations for major residential schemes. The accompanying guidance to the London Plan 2016 has updated the target for this type of development which should strive to be zero-carbon with at least a 35% on-site reduction in CO₂ emissions beyond the Building Regulations 2013. Any shortfall between the calculated 35% CO₂ emissions saving and a fully zero carbon development may be made through a payment in lieu to the Council's carbon off-setting fund. The revised energy statement now acknowledges the zero carbon requirements and it refers to a carbon offsetting payment. The provisions are as follows:

- On site regulated carbon dioxide emissions (Building Rags 2013 Compliant Development) = 11.023 tCO₂ per annum
- Proposed on site reduction of carbon emissions from energy demand/CHP/renewables = 3.88 tCO₂ per annum
- On site shortfall = 7.14 tCO₂ per annum
- Payment in lieu (PIL) = £12,852.

Overall this would be acceptable subject to a S106 to secure the payment in lieu (PIL) for the shortfall in CO2 savings to achieve a fully zero carbon development.

LBB Planning Policy Infrastructure: The proposal is for the following mixture of 10x market residential units: 1x 1-bed, 8x 2-bed, 1x 3-bed. Without prejudice to the determination of the application, the calculated contributions towards health and education are as follows:

Health: £7,716.00

Education: £31,502.91 (comprising: Pre-School: £2,448.81, Primary: £11,097.59, Secondary: £10,901.14 and 16-17: £7,055.37),

LBB Trees: The application site is not subject to tree protective legislation. Nonetheless the most significant trees have been surveyed by the arboricultural consultant and a Tree Protection Plan (TPP) has been supplied in support of the scheme. The proposed parking spaces beneath the sycamore trees are not ideal, however with foreseeable future pruning, this could be managed and is unlikely to be detrimental to the trees. The proposal specifies a non-dig surface and this would reduce the impact on root areas. No objection subject to compliance with the submitted TPP and this could be managed by planning condition.

LBB Waste Services: No comments received

Metropolitan Police (Secure by Design): The submitted details do not acknowledge potential crime or security issues. Notwithstanding this, according to the submitted details the proposal could potentially achieve Secure By Design (SBD) subject to the following points being addressed for the safety and security of the building and the residents:

- The security and permeability of the block and the parking area including details of the access control within the block, security for access around the cycle and refuse storage, secure mail delivery and visitor strategies, secure building lobbies, and the incorporation of tested and accredited doors and windows where required. All of this would be addressed with Secured by design.

Should this application proceed, it should achieve the security requirements of Secured by Design, with the guidance of Design out crime officers (DOCOs) and the New Homes 2019 guidance document. The adoption of these standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment, and a condition requiring the development to engage with police and the local authority to achieve Secured by Design accreditation would greatly assist with the delivery of a safer development in line with national, regional and local planning policies. This could be managed by a Secured by Design condition.

Thames Water: Comments received

Waste Comments:

The developer should demonstrate the measures that will be undertaken 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. If planning permission is granted Thames Water suggests an informative re: Groundwater Risk Management.

If the developer follows the sequential approach to the disposal of surface water Thames Water would raise no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required and the developer should be informed of this by an informative if planning permission is granted.

There may be public sewers crossing or close to the development. If a sewer is discovered, it is important to minimize the risk of damage. Thames Water will need to

check that the development does not limit repair or maintenance activities, or inhibit the services Thames Water provides in any other way. The developer should be informed of the risks by an informative if planning permission is granted.

With regard to the waste water network and waste water process infrastructure capacity, based on the information provided, Thames Water raises no objection.

Water Comments

The proposed development is located within 15m of Thames Water's underground water assets with possible risk to these assets. If planning permission is granted the developer should be informed of this by informative.

With regard to the waste water network and waste water process infrastructure capacity, based on the information provided, Thames Water raises no objection. If planning permission is granted Thames Water recommends the developer is informed of the water service capacity by informative.

Considerations

The main issues to be considered in respect of this application are:

- Resubmission
- Principle and location of development
 - Change of Use
 - Housing Need
 - Affordable Housing
- Design; including landscaping and Secure by Design
- Standard of residential accommodation
- Neighbouring amenity
- Heritage Assets
- Highways
- Sustainability
- Other (ecology/drainage/flooding/noise/pollution)
- CIL
- S106

Resubmission

As mentioned above the Appeal Inspector decided to allow the planning appeal on the previous scheme 18/03790/FULL1 and it is an extant permission which could be implemented in the event that the current scheme is unsuccessful and is therefore a material consideration in assessing the current new scheme. The current scheme is broadly similar in its overall nature except for the following main differences:

- One additional unit (10 in total),
- An undercroft archway through the building to the rear; accommodating additional parking,
- Some dimensional and elevation changes including:
 - An increase in building width from 19m to 19.5m,
 - Insertion of some additional upper floor balconies and Juliet balconies,
 - Insertion of additional windows and dormer windows,
 - Repositioning the front and rear half gable ended features more centrally,
 - Deeper side flank elements,
 - Fully monopitched roofs to the flank elevations in place of a partially hipped side flank roofs,

Otherwise the eaves height and ridge height would remain the same at approximately 8.5m and 13m respectively.

As mentioned above the Bromley Unitary Development Plan 2006 has been replaced by the Bromley Local Plan 2019, however the previous proposal was considered in relation to policies in the Draft Local Plan which have now been formally adopted and therefore there is no material difference in the Development Plan existing between the previous application and the current application. The current proposal will be assessed on its own merits, in relation to the Development Plan and any other relevant material considerations which shall be attributed appropriate weight.

Principle:

Location of development

The site lies within an urban and built up area where there is no objection in principle to new residential development. The proposal is subject to an assessment of the impact of the proposal on the appearance/character of the building, the surrounding area, the residential amenity of the adjoining and future residential occupiers of the scheme and car parking and transport implications. Furthermore, there was no objection either by the Council or by the Appeal Inspector to the principle of the development in the previous appeal scheme.

Land Use

The application site is currently vacant and is understood to have previously been in use as a move-on property providing homeless residential accommodation for up to 8 persons. The Applicant states that the use did not include any element of care, the property has been categorised as Council Tax Band G since 1994 and consequently believes that this fell within the C3 dwellinghouse Use Class. It is not known for certain which Use Class the previous residential activity comprised however from the information available and on the balance of probabilities it is reasonable to conclude that the Use did not comprise a Residential Institution C2 moreover a Dwellinghouse C3 or potentially a Larger House of Multiple Occupation (HMO) C4. The Use of the site was also not questioned by the Council or by the Inspector in the previous appeal cases 12/03294/FULL1 and 18/03790/FULL1.

Housing Need

NPPF Paragraph 11(d) sets out a presumption in favour of granting permission unless the policies in the framework that protect areas or assets of importance provide a clear reasoning for refusing permission (e.g. Green Belt, heritage assets etc.), or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole. In this particular case there are no areas under protection or assets of particular importance. The current proposal would contribute 10 new units to the Council's housing supply which would provide a significant benefit and as mentioned in more detail below there would limited, if any, adverse impacts which would not outweigh this stated benefit to the housing supply.

Housing is a priority use for all London Boroughs. Policy 3.3 Increasing housing supply, Policy 3.4 Optimising housing potential and Policy 3.8 Housing choice in the London Plan (2015) generally encourage the provision of redevelopment in previously developed residential areas provided that it is designed to complement the character of surrounding developments, the design and layout make suitable residential accommodation, and it provides for garden and amenity space.

Furthermore the proposal is assessed in context to the allowed scheme for 9 units and the additional of 1 further unit would provide a significant benefit without any significant adverse impacts when assessed in this incremental context.

Affordable Housing

The proposal would provide 10 units and according to the submitted details the proposed floor area measuring approximately 765sqm would measure less than 1000sqm and on this basis the proposal would not be required to offer affordable housing according to Bromley Local Plan Policy 2.

Design and landscaping

Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Paragraph 124 of the NPPF (2018) states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 127 of the NPPF (2018) requires Local Planning Authorities to ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). New development shall also establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.

Density

The proposal would provide one additional unit (total 10) as compared with the previous appeal scheme. The application site lies within an urban area with a PTAL rating of 4 where the London Plan density matrix (and Bromley Local Plan Policy 4) states that densities of 70-260 u/ha and 2.7-3.0 hr/unit would be acceptable and the current proposal would fall within this range. Nonetheless, the NPPF places less emphasis on notional density figures and greater emphasis on development density that respects the overall visual density characteristics (i.e. overdevelopment, cramped and overbearing appearance) of the prevailing area and therefore a balance between numerical density and visual building mass is necessary and in this context the proposed size and mass of the building would correspond with those around it.

The current proposal would offer 10 self-contained/independent private market flats ranging from: 1x 1b2p, 8x 2b4p, 1x 3b6p and in similarity with the previous 9 private marked unit appeal scheme this would provide a range of accommodation.

Built form and appearance

The currently proposed building would have a broadly similar location, size and form with that of the previous 9 unit appeal scheme; except for the alterations mentioned above including; the additional tenth unit, the undercroft access to the rear part of the site and elevational and fenestration alterations. Nonetheless, these elements are relatively discrete and do not significantly physically alter the external dimensions and proportions of the building and although the proposal would differ from the previously allowed scheme it would remain sufficiently subservient to the site and its size and scale and mass; in similarity to the previous 9 unit scheme would not dominate the site; appear overdeveloped or cramped in relation to the site boundaries and other surrounding. The eaves line would be of a more similar level to those of the neighbouring buildings and the ridge height would not be excessive. The building would continue to have a contemporary appearance which neither the Council nor the Planning Inspector objected to in the previous scheme. Furthermore there is a range of different styles and designs in the area and at neighbouring properties including gable ends, barn hipped ends and dormer windows. The use of materials and the proposed glazing would not appear to differ significantly from the previously allowed appeal scheme and no objection was raised to this in principle in any event.

Trees and landscaping

The proposed landscaping would not appear to differ significantly from the appeal scheme where the Inspector raised no objection and suggested a landscaping condition may be attached to any permission granted.

Secure by Design

According to the Police Designing out Crime Officer residential schemes for 10 units or more should aim to obtain the Police Secured by Design award. The current proposal does not specifically acknowledge or address potential crime or security issues. Notwithstanding this, according to the submitted details the proposal could potentially achieve Secure By Design (SBD) award and consequently help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment subject to certain items being addressed such as a secure lobby area and details of access control, secure delivery post boxes and installation of accredited doors and windows. Engagement with the Police Designing out Crime Officer and the local planning authority to achieve the Secured by Design accreditation could be managed by planning condition.

Standard of residential accommodation

In March 2015 the Government published The National Technical Housing Standards. This document prescribes internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to

accommodate increased circulation and functionality to meet the needs of wheelchair households.

Policy 4 of the Bromley Local Plan sets out the requirements for new residential development to ensure a good standard of amenity. The Mayor’s Housing SPG sets out guidance in respect of the standard required for all new residential accommodation to supplement London Plan policies. The standards apply to new build, conversion and change of use proposals. Part 2 of the Housing SPG deals with the quality of residential accommodation setting out standards for dwelling size, room layouts and circulation space, storage facilities, floor to ceiling heights, outlook, daylight and sunlight, external amenity space (including refuse and cycle storage facilities) as well as core and access arrangements to reflect the Governments National Technical Housing Standards.

The London Plan makes clear that ninety percent of new housing should meet Building Regulation requirement M4 (2) ‘accessible and adaptable dwellings’ and ten per cent of new housing should meet Building Regulation requirement M4 (3) ‘wheelchair user dwellings’, i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The relevant category of Building Control Compliance should be secured by planning conditions.

According to the submitted details the proposal would provide 1x 1b2p, 8x 2b4p and 1x 3b6p unit and according to the drawings they would all meet or in most cases exceed the required floor area relating to the corresponding dwelling size as required by the Nationally described space standard (set out in the table below). Some would fall short of the required built-in storage although this would generally be by 1sqm in each of those cases; which would be a relatively small proportion and in context to the benefits arising from the flatted scheme in general and in context to the previously allowed appeal scheme this would not be significantly harmful and would not warrant refusal. The flats would be generally well served with access to natural daylight and outlook. The bedroom in the 1 bedroom flat in the loft space would be served by roof light however; the kitchen and living area is served by double doors leading out to a balcony.

Dwelling No.	Dwelling size	Minimum space required inc. storage/sqm	Required built-in storage/sqm	Total space provided/sqm
1	2b4p	70	2.0	81
2	2b4p	70	2.0	81
3	2b4p	70	2.0	71
4	2b4p	70	2.0	70
5	2b4p	70	2.0	71
6	2b4p	70	2.0	71
7	2b4p	70	2.0	70
8	2b4p	70	2.0	71
9	1b2p	50	1.5	51
10	3b6p	95	2.5	127

Each of the ground floor units would be served by private garden areas. The remaining flats would all have a balcony area of at least 7sqm all accessed through a communal area, the upper floor 3-bed unit would have an additional balcony accessed via a bedroom, and all would have the use of the communal garden; albeit that it is not a particularly spacious area. Furthermore, there is reasonable access to other publically available recreation space in Sundridge Park approximately 250m walk to the east. On this basis

and in this context the proposal would provide adequate private and communal amenity spaces to serve the needs of the particular occupants.

There is no objection from the Council's Environmental Health Housing Department, subject to the recommended condition/informative reminding the Applicant to be aware of and provide units in accordance with the relevant Housing Act standards.

Neighbouring amenity

Policies 6 and 37 of the Bromley Local Plan seek 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 current scheme is broadly similar in location, size and form to the 9 unit scheme. It would measure approximately 0.5m greater in overall width and the north side outrigger would measure approximately 1.5m greater in depth than that element in the appeal scheme. As mentioned the eaves and maximum ridge height would not differ from the appeal scheme. For these reasons the proposal would not have a greater impact on the amenities of the surrounding occupants.

The main outlook from the building would continue to be to the front and rear elevations thereby reflecting the existing main outlook and a similar degree of overlooking in those directions. Upper floor flats 5 and 8 would have a rear facing window halfway along their length however it would offer very oblique sideward views towards the south and No. 94. All of the upper floor balconies would be enclosed within their side flank walls and this would limit sideward overlooking.

Heritage Assets

The NPPF sets out in section 16 the tests for considering the impact of a development proposal upon designated and non-designated heritage assets. The test is whether the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset and whether it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits. A range of criteria apply.

Paragraph 196/197 state where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset

Within or adjacent to a Conservation Area:

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a requirement on a local planning authority in relation to development in a Conservation Area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

Interpretation of the 1990 Act in law has concluded that preserving the character of the Conservation Area can not only be accomplished through positive contribution but also through development that leaves the character or appearance of the area unharmed.

Impact on Listed Buildings and their setting:

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on a local planning authority, in considering development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting, or any features of architectural or historic interest it possesses.

It is noted from the Planning Inspector's decision that no objection was raised from the impact of the previous appeal scheme on the neighbouring listed building and on this basis the current proposal is unlikely to have a significantly more harmful impact in this regard.

Highways

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. The NPPF clearly states that transport issues should be considered from the earliest stage of both plan making and when formulating development proposals and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The NPPF states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

London Plan and Bromley Local Plan Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Car parking standards within the London Plan and Bromley Local Plan should be used as a basis for assessment.

Notwithstanding the shortfall of at least 3 parking spaces in the previous 9 unit appeal scheme the Appeal Inspector noted, amongst other things, the access to public transport services and the close proximity of the Bromley Town Centre and decided to allow the appeal. The current proposal, by virtue of the undercroft feature and access to a rear parking area, would provide 1 parking space for each flat and this would be an improvement over the previous appeal scheme, and as mentioned above this would not be at the expense of private amenity space for the future occupants.

Sustainability

The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. London Plan and Draft Local Plan Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions.

Policy 5.3 Sustainable Design and Construction of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan states that development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the hierarchy; Be Lean: use less energy; Be clean: supply energy efficiently and Be green: use renewable energy.

The proposal would incorporate energy efficiency, low carbon and renewable energy methods including; lean measures such as passive solar gain, natural daylighting and building fabric efficiencies to reduce the energy demand, low carbon and renewable energy technologies with solar hot water panels, solar PV panels, flue-gas heat recovery and waste-water heat recovery being deemed most feasible, as well as water efficiency measures, SuDS and surface water management.

The adopted Local Plan 2019 Policy 124 refers to Policy 5.2 of the London Plan (2016) which at the time required a minimum target of 35% on-site reduction in CO₂ emissions beyond the 2010 Building Regulations for major residential schemes. The accompanying guidance to the London Plan 2016 has updated the target for this type of development which should strive to be zero-carbon with at least a 35% on-site reduction in CO₂ emissions beyond the Building Regulations 2013. Any shortfall between the calculated 35% CO₂ emissions saving and a fully zero carbon development may be made through a payment in lieu to the Council's carbon off-setting fund. The submitted (revised) energy statement acknowledges the zero carbon requirements set out in the updated accompanying guidance to the London Plan 2016 and as such a payment in lieu for the shortfall amount of £12,852.00 will be required and this could be secured by a Section 106 Agreement.

Other matters

The Environment Agency assesses the proposal as having low environmental risk and there is no objection in principle. However if the Applicant intends to discharge sewerage into the public sewer then an Environmental Permit would be required from the Environment Agency and the Applicant could be reminded of this by planning informative in the event that planning permission is granted.

There is no objection from the Council's Environmental Health Pollution subject to the installation of appropriate boilers to meet the dry NO_x emission rates and provision of electric vehicle charging points, and providing that the development is carried out in accordance with the relevant Environmental Health control of pollution and construction site legislation/guidance and the Applicant could be reminded of this by planning condition/informative in the event that planning permission is granted. It was also recommended to submit a contaminated land assessment, however this was not raised as an issue in the previous appeal scheme and such a condition was not imposed by the Appeal Inspector and in the absence of any material change to the site circumstances in the intervening period this would be unreasonable to do so on the current application.

The Council's Drainage Engineer advises that the proposed surface water run-off/discharge in to the public foul sewer would be unacceptable and that the development should incorporate on-site storage capacity to accommodate all storms up to the 1 in 100 year plus climate change storm event which could be managed by planning condition in the event that planning permission is granted. There is no objection from Thames Water subject to the relevant informatives in respect of its infrastructure and water service provision.

CIL

The Mayor of London's CIL is a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

S106

According to the Council's calculations; and further to the above, this proposal for a major development would be required to provide the following contributions in respect of:

Health £7,716.00

Education £31,502.91

Carbon offsetting £12,852.00

The Applicant has agreed in principle to the required payments.

Conclusion

Having had regard to the above it is considered that the development in the manner proposed 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 area.

Background papers referred to during production of this report comprise all correspondence on the files set out in the Planning History section above, excluding exempt information.

Recommendation: PERMISSION BE GRANTED SUBJECT TO THE PRIOR COMPLETION OF A LEGAL AGREEMENT FOR HEALTH, EDUCATION AND CARBON OFF-SETTING

and subject to the recommended 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: To comply with Section 91 of the Town and Country Planning Act 1990

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the following listed drawings unless previously agreed in writing by the Local Planning Authority:
P001, P002, P003, P004, P005, P006, P007, P400, P401, P402, P403, P404, P500, P501, P502, P503, P504, P505, P506, P507, P508, P509, P510, P511, P600, P601, P602, P700.**

Reason: In the interests of visual and residential amenity and in order to comply with Policy 37 of the Bromley Local Plan 2019.

- 3 Prior to the commencement of the development hereby approved (excluding demolition) 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. The development shall be completed strictly in accordance with the approved levels.**

Reason: Required prior to commencement in order to ensure that a satisfactory form of development can be undertaken on the site in the interest of visual amenity and to comply with Policy 37 of the Bromley Local Plan 2019.

- 4 The development hereby permitted shall be built in accordance with the criteria set out in Building Regulations M4(2) 'accessible and adaptable dwellings'.**

(i) At least 10% of the dwellings hereby permitted shall be provided as wheelchair dwellings in accordance with Building Regulations Part M4(3) 'wheelchair user dwellings'. Prior to the commencement of the development hereby permitted details of proposals to provide dwellings capable of occupation by wheelchair users (including related car parking spaces) shall be submitted to and approved in writing by the Local Planning Authority. The dwellings shall be constructed in accordance with the approved details and permanently retained as such thereafter.

(ii) The remaining dwellings hereby permitted shall be constructed in accordance with the criteria set out in Building Regulations M4(2) 'accessible and adaptable dwellings' and shall be permanently retained as such thereafter.

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

5 Prior to the commencement of above ground works details of the materials to be used for the external surfaces of the buildings shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

Reason: In the interest of the appearance of the building and the visual amenities of the area and in order to comply with Policy 37 of the Bromley Local Plan 2019.

6 Before the development hereby permitted is first occupied the proposed first floor and second floor windows in the north eastern and south western flank elevations (serving Flats 3, 4, 6 and 7) shall be obscure glazed to a minimum of Pilkington privacy Level 3 and shall be non-opening unless the parts of the window which can be opened are more than 1.7 metres above the floor of the room in which the window is installed and the windows shall subsequently be permanently retained as such.

Reason: In the interests of protecting residential amenity and in order to comply with Policy 37 of the Bromley Local Plan 2019.

7 Prior to commencement of above ground works details of treatment of all parts on the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion or first occupation of the development, whichever is the sooner. Details shall include:

(i) A scaled plan showing all existing vegetation to be retained and trees and plants to be planted which shall not include invasive species;

(ii) Proposed hardstanding and boundary treatment;

(iii) A schedule detailing sizes and numbers of all proposed trees/plants;

(iv) Sufficient specification to ensure successful establishment and survival of new planting.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority and works shall be carried out in accordance with the submitted Arboricultural Report by Sylvan Arb dated 14 August 2018.

Any new trees or planting that die, are removed or become severely damaged or diseased within five years of planting shall be replaced. Replacement planting shall be in accordance with the approved details.

Reason: To secure a visually satisfactory setting for the development and to protect neighbouring amenity and in order to comply with Policies 37, 73 and 74 of the Bromley Local Plan 2019.

- 8 Prior to the commencement of the development hereby approved (including demolition and all preparatory work), tree protection measures shall be installed in accordance with the approved Tree Protection Plan. Such measures shall not be moved or removed, but shall be retained in situ until completion of the development and all materials and machinery have been removed from the site, unless otherwise agreed in writing by the LPA. The development shall thereafter be carried out in accordance with the approved details and recommendations within the approved Arboricultural Method Statement or any variation as may subsequently be agreed in writing by the LPA.

Reason: In order that the Local Planning Authority may be satisfied that the trees to be retained will not be damaged during development works and to ensure that, as far as is possible, the work is carried out in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with Policies 37, 73 and 74 of the Bromley Local Plan 2019.

9 **Scheme for Surface Water Drainage**

(i) Prior to commencement of the development hereby approved (excluding any ground clearance or demolition) a scheme for the provision of surface water drainage shall be submitted and approved in writing by the local planning authority. The scheme shall include details to avoid the discharge of surface water from private land on to the highway.

(ii) Before the details required to satisfy Part (i) are submitted an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system (SuDS) to ground, watercourse or sewer in accordance with drainage hierarchy contained within the London Plan Policy 5.13 and the advice contained within the National SuDS Standards.

(iii) Where a sustainable drainage scheme is to be provided, the submitted details shall:

i) provide information about the design storm period and intensity, the method employed to delay (attenuate) and control the rate of surface water discharged from the site as close to greenfield runoff rates (8l/s/ha) as reasonably practicable and the measures taken to prevent pollution of the receiving groundwater and/or surface water.

(iv) The drainage scheme approved under Parts i, ii and iii shall be implemented in full prior to first occupation of the development hereby approved.

Reason: Details are required prior to the commencement of any new operational development in order to ensure that a satisfactory means of surface water drainage, to reduce the risk of flooding can be achieved before development intensifies on site and to comply with the Policy 5.13 of the London Plan and Policies 115, 116 and 117 of the Bromley Local Plan 2019.

- 10 Before any part of the development hereby permitted is first occupied the measures set out in the approved Energy Statement (Bluesky Unlimited 15

March 2019), which should provide a reduction in expected carbon dioxide emissions of at least 35% above that required by the 2013 Building Regulations, shall be incorporated into the final design of the development and implemented and shall be retained thereafter in operational working order.

Reason: In order to seek to achieve compliance with the Mayor of London's Climate Change Mitigation and Energy Strategy and to comply with policies 123 and 124 of the Bromley Local Plan 2019.

- 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, how potential traffic conflicts can be minimised, the route construction traffic shall follow for arriving at and leaving the site, hours of operation and a timescale for the implementation of the Plan. The Construction Management Plan shall be implemented in accordance with the approved timescale and details.

Reason: Required prior to commencement of development to ensure sufficient measures can be secured throughout the whole build programme in the interests of pedestrian and vehicular safety and the amenities of the area and in the interest of the amenities of the adjacent properties and in order to comply with Policies 30, 31, 32 and 119 of the Bromley Local Plan 2019.

- 12 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 on 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 32 Bromley Local Plan 2019.

- 13 Before any part of the development hereby permitted is first occupied parking spaces and turning space shall be completed in accordance with the approved details and thereafter shall be kept permanently available for such use.

Reason: 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 in order to comply with Policy 30 of the Bromley Local Plan 2019.

- 14 Before any part of the development hereby permitted is first occupied that part of a sight line of 43m x 2.0m x 43m which can be accommodated within the site shall be provided in both directions at Plaistow Lane for vehicular visibility and with the exception of trees selected by the Local Planning Authority no obstruction to visibility shall exceed 1m in height in advance of this sight line, which shall be permanently retained as such.

Reason: To ensure that the proposal does not prejudice the free flow of traffic and conditions of general safety along the adjoining highway and in order to comply with Policy 32 of the Bromley Local Plan 2019.

- 15 Before any part of the development hereby permitted is first occupied that part of a sight line of 3.3m x 2.4m x 3.3m which can be accommodated within the site shall be provided in both directions at Plaistow Lane for pedestrian visibility and with the exception of trees selected by the Local

Planning Authority no obstruction to visibility shall exceed 1m in height in advance of this sight line, which shall be permanently retained as such.
Reason: To ensure that the proposal does not prejudice the free flow of traffic and conditions of general safety along the adjoining highway and in order to comply with Policy 32 of the Bromley Local Plan 2019.

- 16 Before any part of the development hereby permitted is first occupied refuse and recycling storage shall be completed in accordance with the approved details and thereafter shall be kept permanently available for such use.

Reason: In order to provide adequate refuse storage facilities in a location which is acceptable in respect of residential and visual amenity impact and in order to comply with Policy 37 of the Bromley Local Plan 2019.

- 17 Before any part of the development hereby permitted is first occupied the bicycle parking arrangements (including covered storage facilities where appropriate) shall be completed in accordance with the approved details and thereafter shall be kept permanently available for such use.

Reason: In order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport and in order to comply with Policy 6.9 of the London Plan.

- 18 **Lighting Details for Parking Area**

(a) Prior to commencement of above ground works 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.

(b) The approved scheme shall be self-certified to accord with BS 5489 - 1:2003.

(c) The lighting scheme as shall be implemented in full accordance with details submitted under Part (a) before the development is first occupied and the lighting shall be permanently retained thereafter.

Reason: In the interest of visual amenity and the safety of occupiers of and visitors to the development and in order to comply with Policies 30 and 37 of the Bromley Plan 2019.

- 19 Before any part of the development hereby permitted is first occupied the existing access shall be stopped up at the back edge of the highway in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The approved enclosure shall be permanently retained as such and the footway/verge reinstated as appropriate.

Reason: In the interest of pedestrian and vehicular safety and in order to comply with Policy 34 of the Bromley Local Plan 2019.

- 20 Before the development hereby permitted is first occupied arrangements shall be agreed in writing with the Local Planning Authority and be put in place to ensure that, with the exception of disabled persons, no resident of the development shall obtain a resident's parking permit within any controlled parking zone which may be in force in the vicinity of the site at any time.

Reason: 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 and in order to comply with Policy 30 of the Bromley Local Plan 2019.

- 21 No loose materials shall be used for surfacing of the parking and turning area hereby permitted.
Reason: In the interest of pedestrian and vehicular safety and in order to comply with Policy 34 of the Bromley Local Plan 2019.
- 22 The development hereby permitted shall incorporate measures to minimise the risk of crime and to meet the specific needs of the application site and development.
(i) Prior to the commencement of above ground works details of such measures shall be submitted to and approved in writing by the Local Planning Authority,
(ii) The approved measures shall be implemented before the development is occupied and the security measures to be implemented in compliance with this condition shall 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 4 and 37 of the Bromley Local Plan 2019.
- 23 The recommendations and observations within the air quality and acoustic report should be followed.
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.
- 24 The application site is located within an Air Quality Management Area declared for NOx: In order to minimise the impact of the development on local air quality any gas boilers must meet a dry NOx emission rate of <40mg/kWh.
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.
- 25 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 within an Air Quality Management Area in line with NPPF p124 and Policies 6.13 and 7.14 of the London Plan.

You are further informed that :

- 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 2017 which is available on the Bromley web site.
- 2 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.

- 3 Before work commences the Applicant should be satisfied that the minimum side space to the boundary shown on the submitted drawing can be achieved. Failure to comply with the Council's requirements set out in the conditions above may result in enforcement action being authorised.
- 4 The Applicant is reminded of their requirements and responsibilities according to The Party Wall etc. Act 1996. Further details can be found at the following address:
https://www.planningportal.co.uk/info/200187/your_responsibilities/40/other_permissions_you_may_require/16
- 5 The Applicant should contact extension 4621 (020 8313 4621 direct line) at the Environmental Services Department at the Civic Centre with regard to the laying out of the crossover(s) and/or reinstatement of the existing crossover(s) as footway. A fee is payable for the estimate for the work which is refundable when the crossover (or other work) is carried out. A form to apply for an estimate for the work can be obtained by telephoning the Highways Customer Services Desk on the above number.
- 6 The Applicant is advised that any repositioning, alteration and/or adjustment to street furniture or Statutory Undertaker's apparatus, considered necessary and practical to help with the modification of vehicular crossover hereby permitted, shall be undertaken at the cost of the Applicant.
- 7 The Applicant is advised that the London Plan Policy 6.13 requires that 20% active and a further 20% passive Electric Vehicle Charging Points (EVCP) are provided for all parking spaces.
- 8 Any further guidance in relation to the physical security standards required by Secured by Design can be found on the Secured by Design website www.securedbydesign.com
- 9 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. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality
- 10 Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Further information can be found on Thames Water's website <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices>
- 11 In relation to sewerage services the developer is advised to read Thames Water's guide "Working near or diverting our pipes" <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

- 12 The proposed development is located within 15m of Thames Waters underground assets and the development could cause the assets to fail if appropriate measures are not taken. The developer is advised to read Thames Water's guide "Working near our assets" to ensure the developer's workings are in line with the necessary processes that the developer needs to follow if they are considering working above or near Tames Water's pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-diverting-our-pipes> Should the developer require further information they should contact Thames Water. Email: developer.services@thameswater.co.uk If the developer is planning to use mains water for construction purposes, it is important to inform Thames Water before the developer starts to use it, to avoid potential fines for improper usage. More information and instruction to apply can be found online at <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Apply-for-mains-design/Building-water-help-and-advice>
- 13 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 Water's pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 14 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 2017 which is available on the Bromley web site.