

Committee Date	21 st May 2020	
Address	Wells House, 15-17 Elmfield Road, Bromley, BR1 1LS	
Application number	19/03620/FULL1	Officer Jessica Lai
Ward	Bromley Town	
Proposal (Summary)	Demolition of Wells House building and the re-development of the site to provide a part 7 and part 8 storey, comprising of 10,598.8sq.m office floor space (Use Class Order Class B1(a)) with associated landscaping, cycle and parking spaces.	
Applicant	Agent	
Mr. Christopher Cradock	Mr. Gardiner Hanson and Mr. Tim Sturgess, Avison Young Ltd.	
Reason for referral to committee	Outside Delegated Powers	Councillor call in No

RECOMMENDATION	PERMISSION SUBJECT TO LEGAL AGREEMENT
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<p>KEY DESIGNATIONS</p> <ul style="list-style-type: none"> • Biggin Hill safeguarding Area • Bromley Town Centre Area • London City Airport safeguarding • Smoke Control

Land use Details		
	Use Class or Use description	Floor space (GIA SQM)
Existing	Office (Class B1)	3,788.2sq.m
Proposed	Office (Class B1)	10, 598.8sq.m (net increase of 6,810.6sq.m)

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	34	14	-20
Disabled car spaces	0	2	+2
Cycle	0	158 long-stay; 14 short-stay	+ 172
Servicing and Delivery	0	3 (Off-street bays)	+3

Electric car charging points	14
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Representation summary	A site notice was placed and the application was also advertised in the press (News Shopper dated 20 th November 2019). The neighbouring properties were consulted and the number of responses received are as follows:	
Total number of responses		14
Number in support		2
Number of objection		10
Number of comments		2

Section 106 Heads of Term	Amount	Agreed in Principle
Bromley Town Centre Improvement Scheme	£24,300	Yes
Total	£24,300	

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site is located within the Bromley South Business Improvement Area (BIA) in Bromley Town Centre and is designated as an Opportunity Area in the London Plan. There is no land use issue within this designated business improvement area. The proposal would provide a significant uplift of office and employment floor space within a designated business improvement area where large scale and high quality purpose built office accommodation should be located in the designated part of the Town Centre
- The proposal would replace the existing dated office building with an high and contemporary office building. The proposal would strengthen the competitiveness and business character of the BIA, creating a high quality office layout and making a positive contribution to the Borough's employment opportunities and quality of office stock.
- The design quality of this pure office development is high. The proposed building would be stepping down towards the south, east and west reducing its massing and bulk. The external finishes of the building would be mainly glazed providing a lighter weight appearance. Timber louvres would be incorporated to articulate the external elevations and break down the overall massing of the building. The proposal would also incorporate multiple terraces with planting on the upper floor providing a degree of visual interest and relief.
- The quantum of the proposed office floor space including the massing of the proposed building has been reduced with an office floor area measuring 10, 598.8sq.m metres within a part 7 and part 8 storey building. The proposed development would be of an appropriate mass, scale, form and design. Whilst the proposal would have an impact to its surrounding area and residential amenities, the impacts would be limited and would not cause unacceptable harm due to the existing and proposed use and distance to the neighbouring properties.
- The proposal would provide adequate parking, cycle storage facilities, access and servicing and delivery arrangements without causing adverse impacts upon the transport network. Adequate sustainability measures would be incorporated achieving the required carbon reduction without causing unduly harmful environmental impacts. Overall, it is considered that the proposal would be acceptable and subject to the recommended planning conditions, it is considered that planning permission be granted.

2. LOCATION

- 2.1 Wells House is a part 4 and part 5 storey office building constructed in the 1980s with 30 dedicated off-street parking spaces. The building is located on the eastern edge of Bromley Town Centre and is designated

as a Business Improvement Area (BIP) with an Article 4 direction in the Bromley Local Plan (BLP). The site is also designated as an Opportunity Area in the London Plan (LP).

- 2.2 The site is located on the east side of Elmfield Road and measures approximately 2,520 square metres (0.25 hectares). The site is mainly surrounded by commercial buildings with offices located to the west and south of the site. The Bank of America Building Crosby House is a four storey mixed use building with residential flats above. Kentish Way (A21) is in an elevated position, is a designated Red Route and is located to the east/rear of the site and under Transport for London (TfL) management. Kentish Way was constructed in 1985 as a relief road extending around the eastern edge of Bromley Town Centre. The ground level of Kentish Way is elevated against the application site.
- 2.3 There is an incline along Elmfield Road and across the site from West to East. The ground level of the site is approximately 1.8 m lower than Crosby House to the north and is approximately 1.9 metres higher than the ground level of Prospect House to the east.
- 2.4 The site is located within flood zone 1 and is subject to medium risk of surface water flooding. The site is located within Elmfield Road Controlled Parking Zone which operates 8am to 8pm on Monday to Saturday, 10am to 5pm on Sunday. The public transport accessibility of the site is rated at 6b on a scale between 0 to 6b where 0 is (Worst) and 6b is (Best). Bromley South railway station is located approximately 250 metres south from the site, served by Thameslink and Southeastern services. There are no existing cycling links in the area. The TfL's Quietways cycle route between Lower Sydenham and Bromley is located approximate 336 metres from the site.



Site location



Existing Building – East Elevation

3. PROPOSAL

- 3.1 Full planning permission is sought for the demolition of the existing office building and the erection of a part 7/part 8 storey office building to provide 10,598.8sq.m of new office floorspace (Use Class Order Class B1).
- 3.2 The proposal would provide an uplift of 6,810.6sq.m modern office floorspace. As part of this proposal, a new pedestrian access would be introduced, via Kentish Way.
- 3.3 The quantum of the proposed office floor space has been reduced from 11,464sq.m to 10,598.8sq.m. The massing of the proposed building has also been reduced from part 8 and part 9 storey to part 7 and part 8 storey with a maximum height reduced from 32 metres to 28 metres when measured from Elmfield Road.
- 3.4 The existing office building is part 4 and part 5 storeys and has a floor area which measures 3,788.2sq.m with 30 off-street parking spaces located to the rear of the building. The existing building measures approximately 26 metres wide, 20 metres deep, 16.6 metres high when measured from Elmfield Road and 20.4 metres high when measured from Kentish Way.
- 3.5 The footprint of the proposed part 7 and part 8 storey office building would be broadly rectangular in shape. The proposed building would measure approximately 53.6 metres wide and 30 metres deep. The floor plate of the proposed building would be gradually reduced from

the second floor and progressively reduced from the fourth floor with outdoor terraces and landscaping areas on the upper floors. The maximum height of the proposed building would measure approximately 28 metres from Elmfield Road and 32 metres when measured from Kentish Way.

- 3.6 Two internal lifts would be installed within the building with a reception, break out area and toilet facilities provided on each floor.
- 3.7 Fourteen parking spaces including two disabled parking spaces would be provided at the lower ground floor level. Four further dedicated servicing and delivery parking spaces, a communal cycle storage area with a capacity for 168 bicycles and showering facilities would be located at lower ground floor level.

4. RELEVANT PLANNING HISTORY

- 4.1 There is no recent planning application or planning enforcement record at this site.

5. CONSULATION SUMMARY

a) Statutory

5.1 GLA (Dated 17th February 2020; see Appendix 1) – Unacceptable

GLA considers the proposal does not comply with the London Plan, in its current form. Details of affordable employment floor space, climate change and highway related measures should be provided. A summary of comments are as follows: -

Principle of development: The principle of the redevelopment of this site for replacement office led development in the Bromley Opportunity Area and the Bromley Metropolitan Town Centre is strongly supported. The applicant should provide further detail regarding provision of affordable employment floor space in compliance with the Mayor's London Plan Policies E1, E2 and E3.

Design: The approach to the building height, massing and scale is supported and the design is of a good quality.

Sustainable development: Further work is required and evidence submitted in relation to energy, flood risk, and green infrastructure.

Transport: The applicant should provide clarification and information regarding to trip generation impact, car parking, cycle parking and healthy streets. A delivery, travel plan and servicing plan and construction logistics plan should be secured by condition.

5.2 Transport for London (Received on 21st Feb 2020) - Unacceptable

Trip generation: Whilst the assessment of trips and mode share is lacking details, given the nature and scale of the development and its location the work is acceptable to TfL at a strategic level.

Cycle parking: 168 long-stay and 14 short-stay cycle parking spaces are proposed and would comply with the minimum standard in the draft London Plan. However, the cycle parking arrangement does not comply with the London Cycling Design Standards and the use of two-tier racks storage should be used in combination with more accessible cycle stands, such as Sheffield stands. A minimum of 5 percent of Sheffield stands and an additional 5 percent of stands should be provided for larger cycles such as cargo bikes.

TfL welcome the provision of shower, changing and locker facilities for staff. Six short-stay spaces would be provided to the rear of the site and should be located at a location with good surveillance.

Car parking: Eighteen parking spaces and two disabled parking person spaces are provided. In line with the draft London Plan, the proposal should be car free due to its public transport accessibility. The Draft London Plan requires ten percent of disabled parking spaces be provided. The provision of two disabled spaces would be in excess of the ten percentage requirement at eleven percent. TfL would accept a reduction of parking provision or on-street disabled bays in the event that the parking spaces are removed. Disabled parking should be secured by planning condition or S106 agreement. Ten active electric vehicle charging points (EVCP) and 8 passive EVCP would be provided and comply with the draft London Plan. TfL would encourage EVCP be provided for all parking spaces including both disabled bays.

Healthy Streets: An updated travel assessment including a pedestrian environment review survey (PERS) and an Active Travel Zone (ATZ) Assessment including mitigation measures should be provided.

Vision Zero: The proposed long-stay cycle parking would be located in the basement car park. The applicant should demonstrate the proposed arrangement would comply with the Mayor's Vision Zero approach to provide a safe and convenient cycle storage area.

Delivery and Servicing: Four delivery bays will be sufficient to serve the proposed development.

Travel Plan (TP): An updated travel plan is required and should take into account the number of proposed parking spaces. The range of measures to encourage walking and cycling is considered acceptable. TfL would strongly encourage on-site bicycle maintenance equipment such as tyre-pumps, puncture repair kits and repair stands be provided.

Construction Logistic Plan (CLP): The estimated construction vehicle movements have not been provided and should comply with TfL's CLP guidance. It is unclear whether vehicles can leave the site in a forward gear during the demolition period and this should be clarified. Loads relating to demolition and construction works should not use the A21 and an appropriate over-sailing and hoarding licence would be required from TfL. The applicant is encouraged to consider off-peak construction deliveries to minimise the impact of congestion in Bromley town centre and the TLRN during peak hours.

CIL: This development will be liable for the Mayor of London's CIL based on the recently revised (MCIL2) charging rates at £60 per square metres.

5.3 Drainage – Acceptable

The proposal would incorporate permeable paving, rain water harvesting green roofs/planting and an attenuation tanks to restrict surface water run-off to 2l/s for all events including the 1 in 100 year plus 40 percent climate change which is in principle acceptable. The measures outlined in the Surface and Foul Waster Strategy should be secured by planning condition.

5.4 Thames water – Acceptable

No objections regarding to the water network and water treatment infrastructure capacity including foul water sewerage and surface water network infrastructure capacity. Site is located within 15 metres of a strategic sewage network. No development shall take place until the details of a pilling method statement are submitted and approved by the LPA in consultation with Thames Water. Thames water has also recommended the following informatives be attached: -

- Petro/oil interceptors be fitted in the car park;
- In line with Building Regulations, a positive pumped device should be installed to prevent sewage flooding;
- Any discharge of ground water to the public network will require a Groundwater Risk Management Permit from Thames water;
- There are water mains crossing or close to the site and the developer is advised to read their guide relating to working near or diverting their pipes; and,
- Thames water must be notified of the use of mains water for construction purposes.

b) Local groups

No comments were received from local groups.

c) Adjoining Occupiers

5.5 Ten letters of objection, two letters of support and two letters of comment were received. The grounds of support and objection are summarised as follow: -

Objections

5.6 Impact on residential amenities (addressed in paragraphs 6.18 to 6.31)

- Overlooking to the residential properties and there would be a “feeling of eyes in the sky” as quoted by a previous Planning Inspector.
- Impact on skyline;
- 8 Storey building would have adverse impact on privacy;
- Loss of outlook and sunlight.

5.7 Building height (addressed in paragraphs 6.4, 6.5, 6.6 and 6.16)

- The proposed building height would have a detrimental effect to the residential properties in Rafford Way. There were two appeal decisions which relate to tall buildings at the former conservative club and both appeals were dismissed.
- The proposed building height would be excessive and there is no need for its height.

5.8 Contrary to development plan policy (addressed in paragraphs 6.10 to 6.16)

- The proposal would not comply with the Bromley Town Centre Action Plan and the existing buildings on the eastern side of Elmfield Road. Any significant change that deviates from the BTCAC would not be appropriate and planning permission should be refused.
- The proposal would set a precedent for tall buildings. The submitted document appears to suggest the properties between 7 and 31 Elmfield Road could be under a single ownership and this is unclear in the submission.
- It is noted that GLA supported the general height principle of stepping down towards the low rise context to the East. GLA Stage 1 comment made reference to the need for a tall building strategy and a masterplan covering this “Bromley Commercial Park” site should be agreed with the Council. It would be inappropriate to consider the proposal if there were a masterplan being prepared at the present time.

Support

5.9 Improvement to the office provision

- The proposal would revitalise the employment quarter in Bromley Town Centre. Whilst the concerns raised by the residents living on Rafford Way are understandable, the building would be occupied during office hours and would not be fully occupied during the weekend when residents are generally more active in the gardens. The existence of trees would provide a degree of screening for the residential dwellings during the summer.

5.10 Good building design

- The proposed building would be more attractive than the existing building and provide a more aesthetically pleasing skyline.

5.11 Comment

- The owners of 7-13 Elmfield Road have advised that reference of a masterplan being prepared and in agreement with the neighbouring site is inaccurate. The owners of 7-13 Elmfield Road have also advised that there was no agreement and the applicant has no control of 7-13 Elmfield Road.
- Bromley is in need of new flexible office space and this creative and memorable design could attract investors and would contribute to the local economy.
- The design of the proposed building is a brave and iconic piece of architecture that would replace a tired 1980s block.
- The proposal building would be 3 floors taller than the existing. The design of the proposed building incorporates curves and angled beam and the incorporation of planting on the upper floor would provide a kind of eco feeling.

5.12 Other

Councillor Rutherford

The proposal would positively contribute to the office district on Elmfield Road. The scale of the office development would not be imposing and would be consistent with the Local Plan.

6. POLICIES AND GUIDANCE

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 National Planning Policy Framework was published on 19th February 2019. The development plan for Bromley comprises the London Plan (March 2016) and the Bromley Local Plan (January 2019). The NPPF does not change the legal status of the development plan.

6.1 National Policy Framework 2019

6.2 NPPG

6.3 The London Plan 2016

- 2.6 Outer London; vision and strategy
- 2.7 Outer London: economy
- 2.8 Outer London: transport
- 2.13 Opportunity area and intensification areas
- 2.15 Town centres
- 3.1 Ensuring equal life changes for all
- 4.1 Developing London's economy
- 4.2 Offices
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.13 Sustainable drainage
- 5.16 Waste net-self-sufficiency
- 5.21 Contaminated land
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.7 Location and design of tall and large buildings
- 7.13 Safety, security and resilience to emergency
- 7.14 Improvement air quality

- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.19 Biodiversity and access to nature
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

5.4 Draft London Plan 2019

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- SD1 Opportunity areas
- SD6 Town centres and high streets
- SD7 Town centres: development principles and development plan documents
- SD8 Town centre network
- D1 London's form, character and capacity for growth
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D9 Tall buildings
- D11 Safety, securing and resilience to emergency
- D12 Fire safety
- D14 Noise
- E1 Office
- E2 Providing suitable business space
- E3 Affordable workspace
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodland
- SI 1 Improving air quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy infrastructure
- SI 4 Managing heat risk
- SI 5 Water infrastructure
- SI 7 Reducing waste and supporting the circular economy
- SI 8 Waste capacity and net waste self-sufficiency
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.2 Office parking

- T6.5 Non-residential disabled persons parking
- T7 Deliveries, servicing and construction
- DF1 Delivery of the plan and planning obligations
- M1 Monitoring

5.5 Mayor Supplementary Guidance

- Accessible London: Achieving an inclusive environment (October 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Town Centres (July 2014)
- Character and Context (June 2014)
- Sustainable Design and Construction (April 2014)

5.6 Bromley Local Plan 2019

- 30 Parking
- 31 Relieving Congestion
- 32 Road Safety
- 33 Access for All
- 37 General Design of Development
- 47 Tall and Large Buildings
- 48 Skyline
- 84 Business Improvement Areas (BIA)
- 90 Bromley Town Centre Opportunity Area
- 113 Waste Management in New Development
- 116 Sustainable Urban Drainage Systems
- 117 Water and Wastewater Infrastructure Capacity
- 118 Contaminated Land
- 119 Noise pollution
- 120 Air Quality
- 122 Light Pollution
- 123 Sustainable Design and Construction
- 124 Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy
- 125 Delivery and Implementation of the Local Plan

5.7 Bromley Supplementary Guidance

- Planning Obligation Supplementary Planning Guidance
- Bromley Town Centre Area Action Plan

6. Assessment

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

- Land Use;

- Design and layout;
- Neighbourhood amenity;
- Transportation and highway;
- Land contamination;
- Air quality;
- Trees;
- Climate change and sustainability; and,
- CIL and planning obligation.

Land use - Acceptable

- 6.2 There is no land use issue arising from this proposal as the proposal would not result in a loss of existing office use (Use Class B1) or a reduction of the existing office floor space within the site or Bromley South Business Improvement Area (BIA). As such, it is considered the proposal would be acceptable in land use terms and would comply with Bromley Local Plan Policy 84.
- 6.3 Bromley Town Centre remains as a prime location for office and employment. Despite the site benefiting from public transport and being within the M25 office market in London, there was a continued decline in office stock in the Borough due to a number of factors, including permitted development rights which was introduced by the Government in 2013.
- 6.4 The London Office Policy Review 2017 published by the GLA indicates that there was a substantial loss of office stock in Bromley between 2000 and 2016 at around 70,000sq.m. This is equivalent to 20 to 30% of the Borough's office stock. This report also indicates that there is a general burden of dated office accommodation in Bromley. This is consistent with the planning application records of this site and planning application records within Bromley South Business Improvement Area.
- 6.5 Whilst there are vacant offices of varying building sizes scattered within Bromley Town Centre, there are no large scale pure office developments under construction in the Borough and the availability of large scale modern offices in the short, medium and long terms is low in Bromley Town Centre.
- 6.6 The London Office Policy Review 2017 report also indicates that there is a net 122,009sq.m office projected demand in Bromley between 2016 and 2041. The proposal would provide 10,598.8sq.m new office space representing an uplift of 6,810.6sq.m of office floor space. Given that the availability of modern office stock in Bromley Town Centre is low at present, officers consider that the principle to introduce new office floor space would be acceptable at this location. The proposal would also strengthen the office environment by replacement of a dated office block with a high quality and attractive office building. The

proposed office accommodation would also contribute to the competitiveness of Bromley Town Centre bringing much needed jobs and employment. It is considered that the proposal would positively transform the attractiveness of Bromley South Business Improvement Area and meet the demand for modern office accommodation in the Borough.

- *Affordable workspace*

- 6.7 Draft London Plan Policy E2.D states development proposals for new B Use Class business floor space greater than 2,500sq.m should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprise.
- 6.8 The applicant considered that the affordable workspace policy has been conceived principally to address imbalance in Central London and prime office locations where rents in many cases have increased exponentially over the last decade. Bromley is the south-eastern most borough of London and whilst its connectivity to Central London is good, it does not attract business in the same way that other more centrally located boroughs or established office locations do. The current office market rent level in Bromley ranges from £16 per sq.ft to £27.5 per sq.ft and this is considerably more affordable and lower than central London, including the neighbouring borough in Croydon. The proposal would provide high quality Grade-A office accommodation in Bromley which include the provision of essential amenities including shower and changing facilities that are deemed necessary for the current market. The build cost of this proposal will need to be achieved with a lease term certain of 10 years or more. The affordable workspace occupiers are unlikely to be in a position to commit to anything more than a three to five year term. The applicant is in discussion with potential occupiers preparing to take the building as a self-contained headquarters office. The potential occupiers are likely to discount the site as an option should an affordable element be enforced as part of the scheme.
- 6.9 The current office market in Bromley is relatively more attractive for small and medium sized business as the rental value is lower and more affordable when compared with the neighbouring boroughs. There is a continued supply and availability of small and medium scale traditional office accommodation in Bromley Town Centre and the Borough. However, the supply of Grade-A modern office accommodation in Bromley is low and there are no other large scale Grade-A office developments in Bromley at the present time. Given the current status of the draft London plan and that there is no adopted or emerging local planning policy for the provision of affordable workspace and in the absence of high quality modern office accommodation in Bromley Town Centre at present, officers consider the proposal to provide high quality office accommodation would strengthen the competitiveness of

the office market in Bromley at the present time. As such, the lack of affordable workspace is considered acceptable in this instance.

Design and layout – Acceptable

6.10 Development plan policies require high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places.

- Site layout

6.11 The proposed building is designed to follow contours across the site and provide a direct connection to Kentish Way (A21) with a new pedestrian access. The main entrance to the proposed building including vehicular access would be via Elmfield Road, which is the same as the existing arrangement. The new pedestrian entrance would provide an active frontage along Kentish Way and improve the permeability and connectivity of the site. The submitted drawings indicate that the boundaries along Kentish Way (A21) and Elmfield Road would be landscaped providing a more attractive connection to its surroundings. Subject to the planting details and specification of boundary treatment, it is considered that the proposed site layout would be acceptable. It should also be noted that dedicated cycle storage areas, locker and showering facilities would be located at the lower ground floor level. This arrangement would encourage and provide an alternative and more sustainable access route for the future users including cyclists to access the site via Kentish Way

- Office layout

6.12 The layout of the proposal is designed to follow the British Council for Offices (BCO) Guide with devisable primary and secondary grids to allow for optimal efficiency and future cellularisation. The proposed building would contain two cores with an adequate number of office utilities including lockers, cycle and showering facilities. The atrium would be centrally and strategically sited to draw light into the office spaces (See figure 1 to5). The BCO guidance indicates that the floor to ceiling height for modern offices is generally higher than the traditional office buildings or residential buildings with a recommended height up to 3.2 metres for deep plan offices. The proposed layout would enable more efficient use of the floor and enable more natural light penetration into the office and better air circulation. As such, it is considered that the proposed office layout is of high quality.

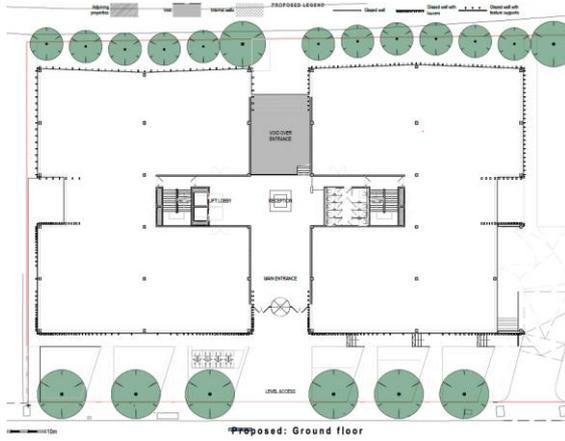


Figure 1. Proposed Ground Floor Plan

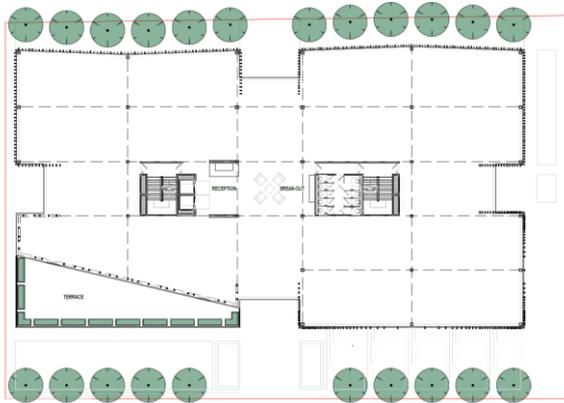


Figure.2 Proposed Second Floor Plan

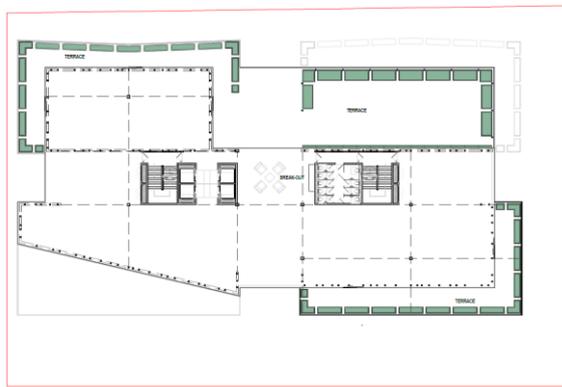


Figure.3 Proposed Fifth Floor

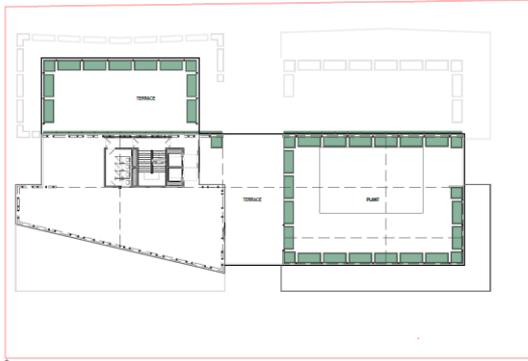


Figure 4. Proposed 6th floor plan

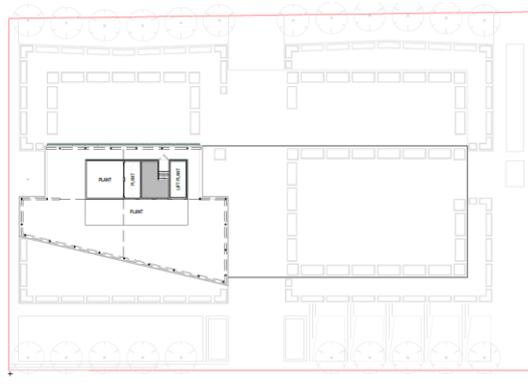


Figure 5. Proposed 7th floor/roof plan

- Tall building

6.13 The existing buildings in Elmfield Road currently range from around 4 to 10 storeys, with the taller Bank of America office buildings on the west side of the road. The prevailing building height on the eastern side of Elmfield Road is mainly 5 storeys in height. The proposal building would be part 7 and part 8 storeys in height and would be higher than the prevailing building height on the eastern side of Elmfield Road. Officer's note that Conquest House (No. 25 Elmfield Road) is located approximately 74 metres south from the site and there were two planning appeals dismissed in 2014 and 2017 for the redevelopment of Conquest House for a mixed use development with residential flats. However, it should be noted that the design, use and distance between the proposal and the houses on Rafford Way are materially different.

6.14 Whilst the proposed building would be higher than the adjoining properties to the north and south, it should be noted that the proposal would replace a dated office block with a visually distinctive and more attractive building within the town centre. The design of the proposed building is of high quality. The proposed building would be stepping down towards the south, east and west. This approach would assist to reduce the massing and bulk of the proposed building. The external finishes of the proposed office building would be mainly glazed providing a lighter weight appearance. Timber louvres would be incorporated to articulate the external elevations and break down the overall massing of the building. The proposal would also incorporate

multiple terraces with planting on the upper floor providing a degree of visual interest and relief. It is considered that the design quality of this pure office development is high (See figures 6 and 7).

- 6.15 The proposal would provide a significant uplift of office and employment floor space within a designated business improvement area where large scale and high quality purpose built offices should be located in the designated part of the Town Centre. It is considered that the proposal would positively strengthen the business character and primary function of the BIA and would comply with Bromley Local Plan Policy 84. With regard to master plan and tall building strategy, the Council is in the process preparing supplementary planning documents to guide future development for Bromley and Orpington Town Centres.
- 6.16 Furthermore, it should be noted that the distance between the proposed building and the houses on Rafford Way is approximately 60 metres (See figure 8). Due to the layout of Kentish Way, the distance between Conquest House and the houses in Rafford Way is approximately 32 metres. As such, it is considered that there are material differences and each proposal should be assessed on its merits.

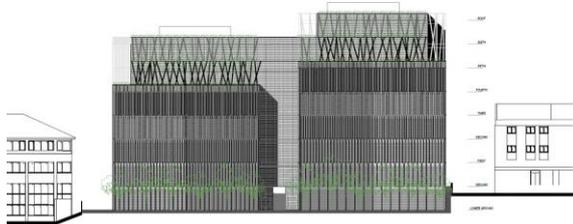


Figure 6. Proposed East Elevation (Kentish Way)

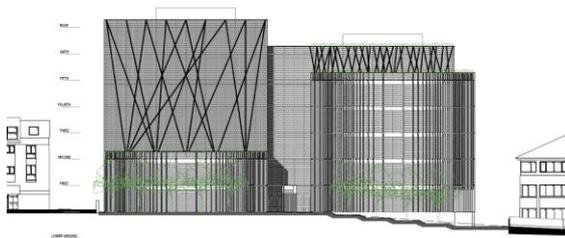


Figure 7. Proposed West elevation

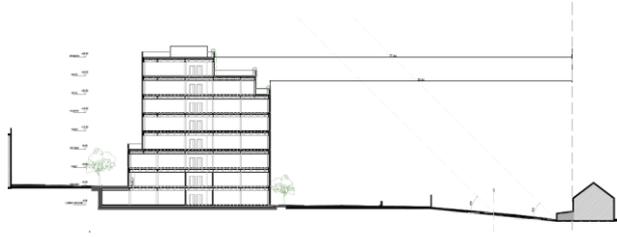


Figure 8. Proposed cross section towards Rafford Way

- Secure by design

6.17 The proposed development has been designed with well-defined entrances and a good degree of natural surveillance at the street levels. The Designing Out Crime Officer considers that the proposals are acceptable from a security perspective subject to the Secured by Design 2015 “Commercial Guide” being followed. As such, it is considered that details confirming the proposal would achieve the secured by design accreditation should be secured by a planning condition.

Neighbourhood Amenity - Acceptable

6.18 Crosby House is the nearest residential building and there are habitable room windows facing the site. The residential houses on Rafford Way would also be affected by the proposal. These houses are located approximately 60 metres east from the site beyond Kentish Way (A21). Nexus Apartments is located approximately 130 south from the site. The impacts are assessed and outlined as follows: -

- Sunlight and daylight

6.19 Guidance relating to daylight and sunlight is contained in the Building Research establishment handbook “Site Layout Planning for Daylight and Sunlight (2011)”. For calculating daylight to neighbouring residential properties affected by the proposed development, the primary assessment is the vertical sky component (VSC) method assessment together with the no sky line (NSL) assessment where internal room layouts are known or can reasonably be assumed. The guidance recommends that the VSC should be 27%, or should not be reduced by more than 20% of the former value, to ensure the distribution of daylight within the room. Any VSC values below 10% indicate that the availability of direct light from the sky will be poor.

6.20 Twenty-four of the closest windows on the south, east and west elevations of Crosby House are identified and would be likely affected by the proposal. These windows are tested in the sunlight and daylight report. It should be noted that there are eight windows on the south

elevation of Crosby House that would be directly facing the site. These windows serve as a second bedroom window and a secondary living and kitchen room to two of the existing two bed flats and two studio units.

- *Vertical Sky Component (VSC)*

6.21 The use and location of these six windows with the new VSC values are tabled as follows:-

- First floor studio unit: W1/11 and W3 /11;
- First floor second bedroom window: W4/11;
- First floor secondary living, kitchen and dining room window;
- Second floor studio unit: W7/12 and W1/12;
- Second floor second bedroom window R4/12;
- Second floor secondary living, kitchen and dining room window R5/12.

Location	Window numbering	Existing VSC %	New VSC % (+/-difference)
First floor studio unit	W1/11	19.91	16.19 (- 18.7%)
First floor studio unit	W3/11;	21.62	15.31 (- 29.2%)
First floor second bedroom window	W4/11	23.94	12.13 (- 49%)
First floor secondary living, kitchen and dining room window	W2/11	27.78	9.71 (- 65%)
Second floor studio unit	W7/12	24.11	18.46 (- 23.4%)
Second floor studio unit	W1/12	26.38	17.39 (- 34.1%)
Second floor second bedroom window	R2/12	28.5	14.01 (- 50.8%)
Second floor secondary living, kitchen and dining room window	W8/12	31.2	11.43 (- 36.6%)

6.22 The sunlight and daylight report indicates that none of the windows would be below 10%, except a first floor secondary living, kitchen and dining room window (W2/11) which would be 9.71%. It should be noted that this living, kitchen and dining room also benefits from a primary east facing window. As such, it is considered that the availability of light of this habitable room remains acceptable in this instance.

6.23 The majority of the tested windows would achieve mid-teens VSC values or above. Two second floor studio windows (W7/12 and W12) would experience a noticeable difference. However, the VSC values of

these windows would be maintained at 17.39% and 18.46%. Given that the site is located within a town centre location and the number of units that would be affected would be limited to 2 studio units, it is considered acceptable within an urban context.

- *No-sky line (NSL)*

6.24 The studio flat on the first floor (W1/11 and W3/11) would experience a 20.44% reduction of existing NSL. This marginally exceeds (at 0.44%) the recommended 20% reduction in the BRE guidance and is considered acceptable. The studio flat on the second floor (W7/12 and W1/12) would experience an unnoticeable 19.22% reduction of existing NSL.

6.25 The second bedroom on the first floor (W4/11) and second floor would experience a noticeable reduction of light with a reduction of 45% and 66.13% of existing NSL respectively. Whilst the reduction of light would be noticeable, it should be noted that 26.6% of NSL valued would be retained and is considered acceptable at this town centre location.

- *Annual probable sunlight hours (APSH)*

6.26 BRE guidance recommends that the APSH received for the subject windows should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the loss is greater than 4%, the proposed value should not be less than 0.8 times their previous value in each period.

6.27 Three windows would be below the recommended guidance. However, it should be noted that the affected units are designed to be dual aspect with more than one window serving the unit and this is considered acceptable. The use and location of the windows below the recommended APSH value are as follows:-

Location	Window Numbering	Value
Primary living room window of the first floor two bedroom flat	W5/11	4%
Secondary living room window of the first floor two bedroom flat	W2/11	3%
Primary living room window of the second floor flat	W3/11	3%

6.28 The proposal would have an impact on sunlight and daylight to the studio units and the two bedroom flats in Crosby House. However, the impact would be limited and would not be beyond an acceptable level.

6.29 A total of 48 windows on Rafford Way are also tested and the VSC values would comply with the BRE guidance with no noticeable loss of

daylight. A ground floor room at 15 Rafford Way (R1/100) and 21 Rafford Way (R1/70) would experience a difference of 30.19% and 38.38% reduction of NSL and this is not considered unacceptable as over 60% NSL would be retained. Due to the distance to the proposed building and its proximity to the Town Centre, it is considered that the impact would be limited and is acceptable.

6.30 Officers note that objections are raised on the ground of overlooking, loss of privacy and loss of outlook issues. Officers would point out the land use of the site would remain identical as existing and there are office windows facing Rafford Way. The existing dated office building would be replaced by a well-designed and attractive building within Bromley Town Centre. Furthermore, the office would be mainly occupied during the office hours and would not be used in the same way as a residential building. The proposed building would be located approximately 65 metres from the houses on Radford Way. The separation distance to the Palace Estate is greater than the dismissed schemes at Conquest House, 25 Elmfield Road. On balance, it is considered that the proposal would not have an adverse impact on residential amenities in terms of loss of outlook and loss of privacy due to its proposed use and separation distance.

6.31 Nexus apartment is located approximately 130 metres south from the site. Due to its location and distance from the site, it is considered that the proposal would not have an adverse impact on the residential amenities.

- Noise and vibration

6.32 An environmental noise survey has been carried out to assess the impact upon the residential flats in Crosby House. The survey indicates that road and traffic noise is the main source of noise during day and night hours. This report establishes the lowest and highest background noise level over a 24 hour period, allowing noise emission limits to be calculated and set in compliance with the Borough's noise criterion providing that the mitigation measures are completed. It is recommended that the location of plantroom and ducts should be sited away from the northern end of the building and the details of mechanical ventilation systems including external plants and equipment should be submitted and approved prior to any installation. These details will be secured by planning conditions. Subject to the planning conditions, it is considered that the proposal would not have an adverse impact or greater impact to the neighbouring properties.

- Wind/microclimate

6.33 A wind assessment in line with the Lawson methodology is submitted which indicates that the prevailing winds blow from the south-west during the year, with secondary winds blowing from the north-east especially during the spring season. The wind condition of the site

would remain suitable and acceptable for pedestrians. However, the terraces on the upper levels would expect to be windier than desired and the proposed terraces should be screened by a 1.5 metres high shrub in planter. Subject to the planting details, it is considered that the proposed office layout would be acceptable and safe for the intended use.

- Construction impacts

6.34 Demolition and construction activities are likely to cause some additional noise and disturbance, additional traffic generation and dust. In accordance with the development, a number of conditions are recommended to minimise these impacts. These will control working hours and require the approval and implementation of a Construction Environmental Management and Logistic Plan. The estimated construction vehicle movements, frequency and confirmation vehicles can leave the site in a forward gear on Elmfield Road should be provided. An appropriate over-sailing and hoarding licence would also be required from TfL.

Transportation and highway - Acceptable

- Access

6.35 The existing vehicular access to the surface level car park is located at the south-western corner of the site, via Elmfield Road. The existing vehicular access would be utilised to provide access to the proposed car park in the lower ground floor (See figure 9). A minimum of 2.4 m x 43m visibility splays for drivers leaving the site will be maintained.

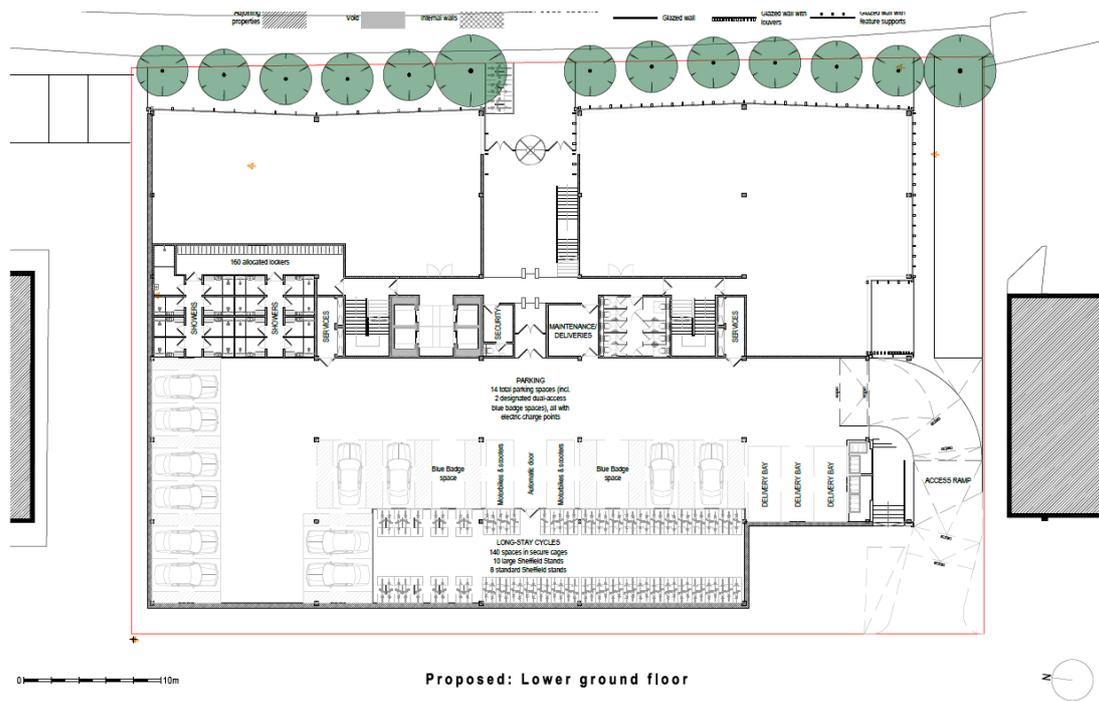


Figure 9. Proposed Lower Ground floor plan – car park level

6.36 A new pedestrian access is proposed connecting the site to Kentish Way (A21). This proposed access would not be accessible by motorists, except cyclists or visitors arriving on foot or public transport. TfL and the Council's Highways Department were consulted and no objection was raised regarding to the proposed pedestrian access connecting the site to Kentish Way. Subject to the boundary treatment and way finding details, it is considered that the proposed new access would improve the permeability and connectivity of the site to its surrounding highway network and as such, this part of the proposal is considered acceptable.

- Parking

6.37 In line with draft London Plan (Policy T6.2), a car free development should be provided as the site has an excellent accessibility rating by public transport. However, officers note that the on-street parking spaces are mostly occupied during the office hours. Officers consider the provision of parking should be considered on a case by case basis and weight should also be given to the proposed use and scale of the proposal. Officers also consider that there should be a provision for disabled person parking. As such, a car free development is not considered suitable when considering the existing and local context in Bromley.

6.38 Table 10.4 under Policy T6.2 sets a maximum office parking level standard for the Outer London Opportunity Area as 1 space per 600sq.m for office development and up to a maximum of 18 parking spaces could be provided. The proposal would provide 14 parking spaces and would comply with the policy requirement.

6.39 Furthermore, it should be noted that the proposed parking ratio would be reduced from 1 space per 111.4sq.m (34 spaces / 3,788.2sqm) to 1 space per 757.1sq.m (14 spaces /10,598.8sq.m). It is considered that the parking provision would be acceptable.

6.40 Table 10.6 under Policy T6.5 requires 10 percent of disabled parking spaces to be provided. Two disabled person parking spaces (14.3%) would be provided and would exceed the 10 percent policy requirement. However, it should be noted that this policy requirement is neither maximum nor minimum. On balance, it is considered that the provision of 2 disabled parking spaces would be acceptable in this instance.

6.41 Policy 6.13 of the current London requires 1 in 5 parking spaces (both active and passive) be provided with an electric charging point. The applicant has confirmed electric charging points would be provided for all parking spaces and would comply with the policy.

- Trip generation

6.42 The trip generation (person trips per 100sq.m) would be increased from 119 to 361 during the AM peak hours (08:00 -09:00) and from 103 to 313 during the PM peak hours (17:00- 18:00). However, the proposal would result in a significant reduction of off-street parking spaces and the lack of parking opportunities in the surrounding area would suggest there will be a reduction in vehicle trips associated with the site. As such, it is considered that the proposal would not result in demonstrable harm to the operation of the highway network.

6.43 A workplace travel plan including a range of measures and initiatives are provided and is considered acceptable. The proposed measures would promote walking, cycling and use of public transport. The travel plan would be reviewed on a regular basis by a travel plan coordinator. Transport for London recommends on-site bicycle maintenance equipment should be available and an updated travel plan should be provided in line with the reduction of parking spaces. This detail can be secured by a planning condition.

- Cycle

6.44 Table 10.2 under Policy T5 of the draft London plan sets the standards for long-stay and short-stay cycle storage provisions. Policy T5 requires cycle parking be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

6.45 The proposal would provide 158 long-stay cycle storage spaces in the lower ground level including 10 large Sheffield stands for larger bicycles and 8 standard size Sheffield stands. This level of provision slightly exceeds the minimum requirements of current standards.

6.46 The short-stay cycle storage would be located at the street levels with 8 cycle storage spaces located adjacent to the main building access on Elmfield Road and a further 3 Sheffield Stands for 6 cycles located adjacent to the Kentish Way entrance to the building.

- Healthy Streets and vision zero

6.47 TfL have introduced the Healthy Streets approach aiming to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work and play. The Healthy Street approach prioritises walking, cycling and public transport over car use.

6.48 A Healthy Street and Active Travel Zone Assessment is submitted which identifies the routes to local services that will be used by site

users within a 20 minute walking and cycling distance. The healthy streets indicator indicates that the overall scoring of the proposal would be increased from 78% to 88 % when assessing against the following elements:

- Pedestrians from all walks of life;
- Easy to cross;
- Shade and shelter;
- Places to stop and rest;
- Not too noisy;
- People choose to walk, cycle and use public transport;
- People feel safe;
- Things to see and do;
- People feel relaxed; and ,
- Clean air.

6.49 The proposal would provide more opportunities for active travel as a new pedestrian access from Kentish Way would be provided. The proposal would also improve provision for cyclists with 158 cycle parking spaces, locker and shower facilities including short-stay spaces provided adjacent to the entrances to the proposed building. This assessment also indicates the majority of footways surrounding the site are step-free and of adequate quality. The platforms at Bromley South and Bromley North stations are both step-free. Overall, it is considered that the proposal would represent a positive improvement when compared with the existing layout.

- Servicing and delivery

6.50 Three dedicated on-site servicing and delivery bays would be provided in the car park for light goods vehicles. Any larger deliveries would be accommodated on-street on the existing single yellow line and managed by the on-site management team. The proposal is likely to attract up to 30 deliveries per day and this will vary subject to the end users. The serving and delivery procedures will be monitored and be reviewed by the facilities management team on a regular basis. Business waste will be managed by the facilities management on collection days. It is considered that the servicing and deliveries arrangement including the waste collection arrangement would be acceptable.

Land contamination- Acceptable

6.51 The application has been accompanied by a Phase one desk study which assessed the likely contamination of the site. This report indicates that the site has historically been used for residential purposes followed by conversion into a high school. This report indicates that the site is subject to the following contamination risk: -

- low to moderate risk of contact with contaminated soils by current and future users;
- moderate risk of asbestos in the buildings;
- low risk of mobile contaminants such as hydrocarbon impacted the underlying aquifer;
- low to moderate risk of infrastructure such as pipes being impacted by potential hydrocarbons;
- moderate risk of gaseous vapours from spillage; and ,
- low risk of site-based contaminants impacted on adjacent properties.

6.52 The Council's Environmental Health was consulted and it is recommended that a Phase II Intrusive Investigation should be undertaken including chemical analysis of soil and ground water in conjunction with a programme geotechnical component which should be provided prior to any works commencing at the site. It is also recommended that a pre-demolition asbestos survey should be undertaken prior to any works commencing on site. These details can be secured by planning conditions. The Council's Environmental Health Officer has raised no objection to the proposal.

Air quality - Acceptable

6.53 The air quality and air quality neutral assessment has been reviewed by the Council's Environmental Health and no objection is raised. The air quality and air quality neutral assessment shows that the development will not result in any significant impacts on air quality. The proposed development will be supplied with electricity through Photovoltaics PV and heat through air source heat pumps. There will be no on-site building emissions. The transport emissions associated to this proposal would be less than the total transport emission benchmarks for both NO_x and PM 10. The proposed development would not have an adverse impact on local air quality and the road traffic movements predicted for the proposed development would be neutral. The demolition and construction works would have an impact on air quality. A Construction Environmental Management Plan (CEMP) details all procedures for managing the risks of pollution (air, land, noise and water) and outlines how a construction project will avoid and minimise or mitigate effects on the environment and surrounding area and this should be secured through a planning condition. The Council's Environmental Health Officer has raised no objection to the proposal.

Trees - Acceptable

6.54 An Arboricultural Impact Assessment is submitted which indicates that there are no trees covered by Tree Preservation Orders within the site. A total of six trees (T1 – Rowan/category U, T4 – Sycamore/category U, T5 - Ash/category B, T6 - Ash/category B, T7 – Ash/category B and T8 - Ash/category B) would be removed as a result of the proposal. A

landscaping plan is provided which indicates there will be a net gain of new planting to mitigate the loss of the trees. Subject to the details of a planting schedule, it is considered that the proposal would provide an opportunity to create high quality urban landscaping initiatives. It should be noted that the proposal would incorporate a number of roof planting on the upper floor. The Council's Tree Officer has raised no objection to the proposal.

Climate change and sustainability- Acceptable

- Drainage and flooding

6.55 Development plan policies seek to manage flood risk and encourage the use of sustainable urban drainage. The site is located within Flood Zone 1 and part of the site is subject to a medium surface water flood risk. The application is supported by a surface and foul water drainage strategy which demonstrates that there would be no increase in surface water runoff from the development. A range of surface water mitigation measures would be incorporated to manage and minimise surface water runoff. The proposed measures would include permeable pavement, green roofs, rainwater harvesting, an attenuation storage tank and proprietary treatment systems. The Council's Drainage Officer has raised no objection to the proposed mitigation measures and the details would be secured by condition and are therefore considered acceptable.

- Carbon reduction

6.56 In line with the adopted development plan, the proposal is required to achieve a minimum of 35% carbon reduction on site below 2013 Building Regulations standards.

6.57 The sustainability and energy statement indicates that the proposal is designed to comply with the minimum requirement. Air source heat pumps (ASHP), solar water heating and an approximate area of 203sq.m solar photovoltaic would be used to achieve the requirements. The total regulated carbon reduction savings for the site are 46 tonnes per year, equivalent to 50 percent carbon reduction and would comply with the policy requirement.

Community Infrastructure Levy

6.57 Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), the proposal would be liable to the Mayor of London's CIL.

S106 Legal Agreement

6.58 Part 11 of the Community Infrastructure Regulations 2010 introduced the requirement that planning obligations under Section 106 must meet

3 statutory test, i.e. that they area (i) necessary to make the development acceptable in planning terms, (ii) directly related to the development, and (iii) fairly and reasonably related in scale and kind to the development.

Head of Terms

6.59 Bromley High Street and Town Centre Improvement Scheme £24,300.

7. Conclusion

7.1 Please see the summary and key reasons for recommendation above

RECOMMENDATION:

PERMISSION BE GRANTED SUBJECT TO STAGE 2 REFERRAL TO THE MAYOR OF LONDON, PLANNING CONDITIONS AND LEGAL AGREEMENT.

SUMMARY OF CONDITIONS AND INFORMATIVES

Pre-commencement Conditions

1. Surface water strategy
2. Pilling method statement in consultation with Thames water
3. Contamination and asbestos
4. Construction environmental management and logistic plan in consultation with TfL

Above ground conditions

5. External materials
6. Landscaping plan including terraces

Pre-occupation conditions

7. Energy measures
8. Travel plan
9. Servicing and delivery plan
10. Secured by Design
11. External plant and ventilation details
12. Internal lighting details out of office hours

Compliance conditions

13. Time limit of 3 years
14. Drawing numbers
15. 2 disabled parking spaces.
16. Car park
17. Cycle storage
18. Electric charging points

Informatives

1. Thames water
2. TfL
3. CIL