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| Committee Date | 19/11/2020 | |
| Address | 18 Homefield Rise Orpington BR6 0RU | |
| Application number | 20/02697/FULL1 | Officer: Jessica Lai |
| Ward | Orpington | |
| Proposal | Demolition of 4 pairs of semi-detached two storey houses and one detached bungalow and erection of one part 3/part 4 storey building at 18-28 Homefield Rise comprising 37 x 1 and 2 bedroom apartments with 22 parking spaces (Block A/Phase 1). Erection of one part 3/part 4 storey building at 38-44 Homefield Rise comprising 31 x 1 and 2 bedroom apartments with 20 parking spaces (Block B/Phase 2). Erection of cycle and refuse stores. Associated landscaping and tree planting (Amended Description). | |
| Applicant | Agent | |
| Lansdown Goldman Klein Ltd & Clarion Housing | Mr John Escott Robinson Escott Planning Downe House 303 High Street Orpington BR6 0NN | |
| Reason for referral to committee | Major application, Outside Delegated Authority | Councillor call in No |

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| RECOMMENDATION | PERMISSION SUBJECT TO LEGAL AGREEMENT |
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| KEY DESIGNATIONS Area of Archaeological Significance Biggin Hill Safeguarding Area London City Airport Safeguarding Open Space Deficiency |
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| Vehicle parking | Existing number of spaces | Total proposed spaces | Difference in spaces (+ or -) |
|----------------------------------|---------------------------|---|-------------------------------|
| Standard car spaces | N/A | 34 (18 in Phase 1 16 in phase 2) | +34 |
| Wheelchair accessible car spaces | N/A | 8 (4 in Phase 1 and 4 in Phase 2) | +8 |
| Cycle | N/A | 136 (70 in Phase 1 and 66 in Phase 2) | +136 |

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| Electric vehicle charging points | 9 Active (5 in Phase 1 and 4 in Phase 2 equates to 20 percent). 33 Passive (17 in Phase 1 and 16 Phase 2 equates to 80 percent). |
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| Representation summary | Neighbour letters were sent on the 11 th August 2020. A further 14 days re-consultation letter was sent on the 24 th September 2020 and the 29 th October 2020. A site notice was displayed at the site on the 21 st September 2020. The application was also advertised in the News Shopper on the 19 th August 2020. |
| Total number of responses | 81 |
| Number in support /comment | 25 |
| Number of objections | 56 |

| Section 106 Heads of Term | Amount | Agreed in Principle |
|----------------------------------|--|----------------------------|
| Education | £ 156,738.28 (Phase 1: £115,187.28; Phase 2: £73,087.58) | Yes |
| Health | £79,557 (Phase 1: £ 41,551.00; Phase 2: £38,006.00) | Yes |
| Energy | £93, 528 | Yes |
| Affordable Housing | 13 affordable rent unit 10 intermediate unit | Yes |
| Highway | £15,000 | Yes |
| Total | £331,323.28 | |

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site is allocated for housing development in the Bromley Local Plan for around 100 residential units. The principle to redevelop the site to make more efficient use of the land is therefore supported.
- The redevelopment of this allocated site is divided into three phases and this application covers the first phase of the development and would provide 68 new housing units including 23 affordable housing units comprising of a mixture of one bed and two bed units. The affordable housing provision and the proposed tenure split would comply with the policy requirements. The proposal would provide adequate internal and external living space for the future occupiers and a dedicated child play area would be provided in each phase of the development.
- The applicant has advised that an option agreement is secured with 3 owners of Phase 3 and is in discussion with a remaining owner to secure the land. For the purpose of this application, a phasing plan covering the entire Site 11 has been provided which indicates this proposal would not compromise the site allocation policy requirements.
- The proposal is designed to address the issues raised in the previous 2016 scheme. The previous planning appeal decision highlighted that the Council had a 5 year housing land supply at the time of the determination of the previous decision in 2018.
- The proposal would be visible from the neighbouring properties and the proposal would represent a change in the area. The siting of the proposed buildings would be set in from Homefield Rise and a greater distance would be provided towards its rear boundary and the neighbouring properties on Lancing Road. The use of angled windows, obscured glazed units and louvre screens would ensure an adequate level of privacy can be maintained and the perception of being overlooked can be minimised.
- The site is located within a highly sustainable location with easy access to public transport networks as there are 13 bus routes within 5 minutes walk from the site and access to local amenities. The proposal would provide 42 parking spaces and the level of parking provision is considered acceptable at this sustainable location. The access and cycle storage provisions are acceptable and the proposal would not have an adverse effect on the local highway network.
- A landscaping plan with mature trees would be secured by planning condition to ensure adequate replacement planting can be provided across the entire site.
- The development is considered acceptable from a sustainability, air quality and environmental health perspective. Subject to the planning conditions, s106 legal agreement and s278 highway agreement, it is

considered that the benefits of the proposal would outweigh the impact arising from this proposal and planning permission should be granted.

1. LOCATION

- 1.1 The application sites (Phase 1 and Phase 2) measure approximately 5,100 square metres in area and lies between Gravel Pit Way and Mortimer Road. The application sites comprises of 4 pairs of semi-detached houses and a detached house (Number 18 to 28 Homefield Rise and number 38 to 44 Homefield Rise).
- 1.2 Opposite the site is a part 4 to part 9 storey residential block and there is a surface car park adjacent to the site. The sites adjoin to the rear gardens of the detached houses on Lancing Road (Number 21 to Number 45).



Fig 1: Site location plan

- 1.3 The existing houses are located on a slope. The ground level of the sites drops from east to west and also drops down from south to north. The ground level of the houses on Homefield Rise is lower than the houses to the rear on Lancing Road. There are no TPO trees within the sites.
- 1.4 The sites form part of the allocated site (Site 11) in the Bromley Local Plan for housing development. The sites are located to the south of the Walnuts Shopping Centre, Orpington College and adjacent to Orpington Town Centre.
- 1.5 The public transport accessibility of the site on Homefield Rise is rated at 4. There are 17 bus routes (51, 61, 208, 353, 368, B14, R1, R2, R3, R4,

R5, R6, R7, R8, R9, R10, R11) within 2 to 5 minutes walk from the site. Orpington Railway Station is approximately 1,010 metres away from the site.

- 1.6 The site is located within Flood Zone 1. The site is not generally subject to surface water flooding, except part of the rear gardens of 18 and 20 Homefield Rise is subject to a low to high surface water flood risk.
- 1.7 The site is located within a public open space deficiency area and falls within the Orpington, Goddington and Knoll Renewal Area in the Local Plan.
- 1.8 The site is adjacent to an Archaeological Priority Area. The site is not located within or adjacent to any Conservation Area. There are no listed buildings within the site. The nearest locally listed building from the site is No. 235 – 237 Orpington High Street (Nat West Bank). The Priory Conservation Area is located over 530 metres north from the site.

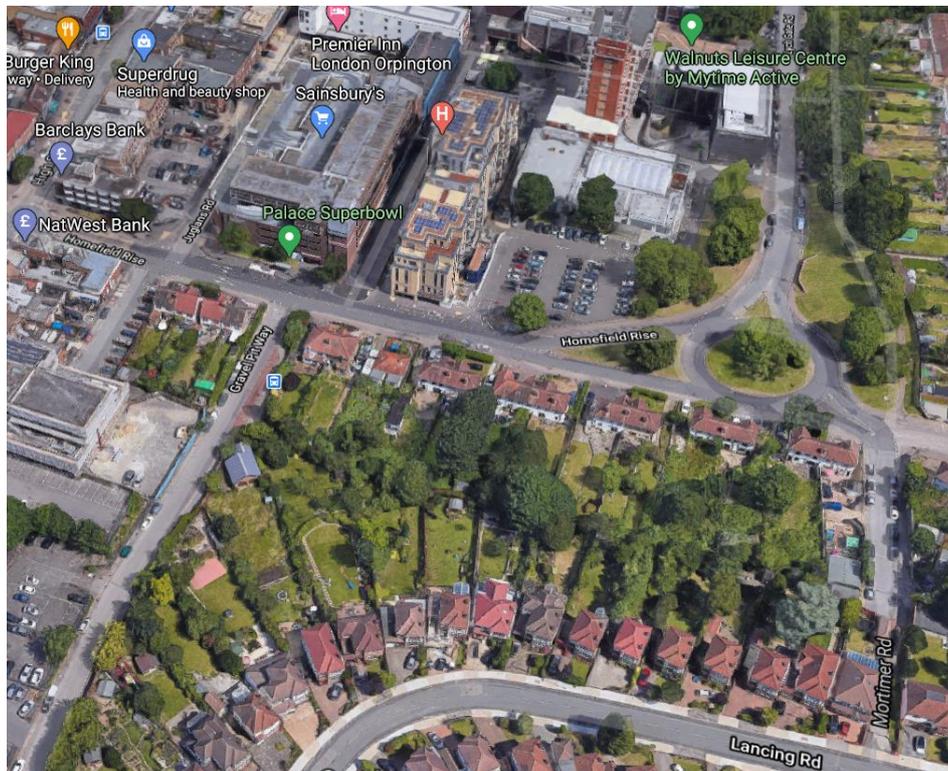


Fig 2: Aerial Photo of the Site (credit: Google Maps)

2. PROPOSAL

- 2.1 The redevelopment of this allocated Site 11 - Homefield Rise is divided into 3 phases. This entire allocated site measures approximately 158 metres in width, 49 metres in depth and 0.745 ha in area.

Site 11

Homefield Rise, Orpington



Fig 3: Bromley Local Plan – Site 11- Homefield Rise

- 2.2 This application covers Phase 1 and Phase 2. Phase 1 measures approximately 0.27 ha in area and is occupied by 5 houses (Number 18 to 28 Homefield Rise). Phase 2 measures approximately 0.24 ha in area and is occupied by 4 houses (Number 38 to 44 Homefield Rise). Phase 3 is occupied by 4 houses (Number 30 to 36 Homefield Rise) and does not form part of this application.



Fig.4. Propose Phasing Plan

- 2.3 The first two phases of the development would provide a total of 68 residential units, including 23 affordable housing units with 44 parking

spaces. The accommodation would be provided in two buildings, Block A (Phase 1) and Block B (Phase 2). The proposed affordable housing would be located in Phase 1 with 22 parking spaces, including 4 disabled parking spaces. Phase 2 would be provided with 20 parking spaces, including 4 disabled parking spaces.

- 2.4 The proposal would provide 35 percent affordable housing by habitable room and achieve a split of 60 percent rent and 40 percent intermediate units.
- 2.5 Each of the proposed units would be provided with private balconies and adequate internal living space would also be provided for each of the proposed units.
- 2.6 A total of 7 wheelchair units would be provided. Internal lifts would be provided in each phase of the development and this would be accessible to all floors. The details of housing mix, size and tenure is as follows:

| Phase I | 1 bed | 2 bed | Total |
|-------------------------------|--------------|--------------|--------------|
| Private | 2 | 12 | 14 |
| Rent | 4 | 9 | 13 |
| SO | 2 | 8 | 10 |
| Total | | | 37 |
| | | | |
| Phase 2 (Private Only) | 1 bed | 2 bed | Total |
| Private | 8 | 23 | 31 |

- 2.7 The proposed buildings are designed with a flat roof and would be part three and part four storeys in height. The proposed buildings would set in from Homefield Rise and would measure 5.5m to 5m metres from the pavement. The footprint of the buildings would be broadly rectangular in shape. The external materials would be mainly constructed in brick and light brown in colour.
- 2.8 Phase 1/Block A would measure 51 metres in width, 28.5 metres in depth and between 9.5 to 12.6 metres in height. The height of Block A would measure between 1.5 metres to 4.4 metres higher than the ridge line of the existing houses. The rear building line of this building would be positioned between 15 metres to 23.5 metres from its rear boundary. A communal vehicular access leading to the car park would be created via Homefield Rise. A dedicated child play area is provided and located to the rear of the proposed building.



Fig 5. Phase 1/Block A – Homefield Rise elevation

2.9 Phase 2/Block B would measure 42.5 metres in width, 28 metres in depth and between 9.5m to 12.6m in height. The height of Block B would measure between 3 to 5 metres higher than the ridge line of the existing houses. A communal vehicular access would be created via Mortimer Road. An amendment to the existing on-street parking spaces on Mortimer Road would be required. A dedicated child play area is also provided to the rear of the building.



Fig 6. Phase 2/Block B – Homefield Rise elevation

2.10 The roofline of the proposed part three/part four storeys buildings are designed reflect the topography of the site.



Fig 7. Computer generated image (CGI) – proposed front elevation plan facing Homefield Rise

2.11 A dedicated communal waste area would be provided for each phase of the development. Cycle storage areas to accommodate 136 spaces would also be provided.

2.12 Externally an indicative scheme of landscaping is proposed, including the provision of replacement planting, child play areas with equipment and external paths. The proposed car park would be paved with

permeable materials and a soakaway system would also be installed in each phase of the development.

3. RELEVANT PLANNING HISTORY

- 3.1 Outline planning permission (ref; 16/04563/OUT) was refused on the 25th July 2017 for the demolition of numbers 18-44 Homefield Rise and the construction of 103 residential apartments in four separate three and four storey blocks to be served by two accesses, together with associated car parking, cycle parking, refuse storage and private communal amenity space. The subsequent planning appeal was dismissed on the 13th February 2018 (ref 3183366).
- 3.2 The main issues/grounds in dismissing the previous 2016 scheme can be summarised as follows:

Issue 1: The effect of the proposal on the character and appearance of the area

- The previous scheme was not considered acceptable due to its design, scale, massing and close proximity to Homefield Rise.
- The residential density was 388 per hectare and was above the recommended density level. The existing dwellings are set back from the carriage way, in combination with the college car park opposite and the mature landscape highway verges providing a sense of openness and spaciousness on the approach into the town centre from Homefield Rise to Lych Gate Road.
- The roofscape of the previous scheme did not reflect the topography of the site as it drops down with the 2 central blocks much taller than Block D.
- The site was identified in the emerging local plan for housing development. However, the local plan was not adopted at the time the appeal was determined in 2018 and less weight was given by the Inspector to the emerging plan policy which required development at this site to create an effective transition between the adjacent town centre and the low rise residential area as well as respecting the amenity of adjoining properties.

Issue 2: The effect of the proposal on the living conditions of neighbouring occupiers, with particular regard to privacy and outlook.

- The habitable room windows on the flank wall of Block A and D including balconies were considered to result in overlooking to No. 10, 12, 16 and 48 Homefield Rise. The rear windows of Block B and C were considered to result in overlooking to the houses on Lancing Road given the scale of the buildings which were also considered to be substantial including the siting of the buildings and the depth of Block A and D. The proposal

was considered to result in a sense of enclosure, perception of overlooking and a loss of privacy.



Fig 8. Site layout of the previous 2016 scheme, dismissed in 2018.



Fig 9 Elevation plan of the previous 2016 scheme, dismissed in 2018.



Fig10. CGI of the previous 2016 scheme, dismissed in 2018.

- 3.3 Full planning permission (ref: 19/00732) was withdrawn on the 1st August 2019 for the demolition of Nos. 18-22 Homefield Rise and the construction of 9 x 4 bed houses with associated access and car parking (REVISED PROPOSAL to increase number of bedrooms per unit from 3 to 4 and increase height to 3 storeys with accommodation in the roof space).

4. CONSULTATION SUMMARY

a) Statutory:

4.1 Highways – No objection

Access

The access to Block A/Phase 1 is from Homefield Rise. A gate is proposed which sets back approximately 7 metres from the carriageway which is acceptable.

The vehicular access to Block B is from Mortimer Road. A gate set back from the road approximately 15 metres is proposed and is considered acceptable.

The stopping up of existing crossovers, reinstatement of footway and the relocation of any street furniture or parking bays/restrictions will be at the applicant's expenses.

Stage 1 Road Safety Audit (RSA)

A Stage 1 RSA is provided as requested. One issue raised was the parking bays on Homefield Rise and Mortimer Road and their potential impact on sightlines from the proposed access. Such situations are relatively common in urban areas. This was also raised in the previous application and it was suggested that should concerns be raised about the bays after occupation they could be removed or relocated and to allow the Council to monitor and subsequently undertake amendment a contribution of £5,000 should be secured by a s106 legal agreement. A Stage 2 and 3 RSA should be also secured by planning conditions at appropriate stages of development.

Parking

The parking ratio in Phase 1 is 0.59 spaces per dwelling and 0.65 spaces per dwelling in Phase 2. The parking ratio for both phases would be below the suggested range of 0.7 space to 1 space per unit in the Bromley Local Plan but would be higher than the former Police Station site at 0.55 spaces per dwelling.

Provision of free car club memberships and 20 hours driving hours per dwelling should be provided and secured by a legal agreement. A car

park management plan will be required to confirm how the parking spaces will be allocated.

Trip generation

The net vehicular trip generation (68 flats minus 9 houses) is shown below:

| Time period | Arrivals | Departures | Two way |
|----------------------|-----------------|-------------------|----------------|
| 08:00 – 09:00 | 2 | 8 | 10 |
| 17:00 – 18:00 | 11 | 7 | 17 |
| Daily | 44 | 59 | 114 |

The Transport Assessment submitted in the 2016 (proposed 105 units) includes an assessment of the mini-roundabout junction of Homefield Rise and the High Street which confirmed the development would be within capacity during the peak hours with flows factored up to 2021. Any new assessment carried out during Covid-19 since March 2020 would have underestimate the situation. Given the significant reduction of residential units in this application and the transport model covers under 2021, it is considered that the previous conclusions are unlikely to change.

Servicing

Waste vehicles would not enter the sites and would be serviced from the road. A planning obligation of £10,000 should be secured by a s106 legal agreement to monitor the servicing from the road for 5 years for any required highway works associated to this development. A refuse storage area should be located within 18 metres from the road and Waste services should be consulted.

Cycle parking

The provision of cycle spaces would comply with London Plan policy. The storage spaces should be waterproof in both phase of the development.

Construction phase

A construction management plan will be needed if permissions forthcoming, all deliveries and site staff parking will need to be accommodated within the site.

Should planning permission be granted, the following condition should be attached:

- Parking
- Hardstanding for was down facilities
- Cycle parking

- Stopping up of accesses
- Construction management plan
- Highway drainage
- Stage 2 and 3 Road Safety Audit
- Car park management plan

Developer is required to enter into a s278 highway agreement to construct the development. The following should be secured by a s106 agreement and these obligations will be return in 5 years if not used:

- £ 5,000 – future parking controls
- £ 10,000 – future highway works

4.2 **Drainage (lead local flood authority) – No objection**

The Flood Risk Assessment Report (prepared by Herrington Consulting Ltd dated 17/07/2020 issue 3 Revision 1) indicates that permeable paving will be used in the car park area and a large soakaway would be incorporated in each phase of the proposed development. The applicant has also acknowledged the low spot area in the south west of the site. The assessment and proposed measures in the report is considered acceptable and shall be implement and secured in full by a planning condition.

4.3 **Thames Water – No objection**

- The proposal is located within 15 metres of a strategic sewer. The details of pilling method statement will need to be secured by a planning condition. A Groundwater Risk Management Permit will be required from Thameswater to discharge groundwater into a public sewer, typically result from construction site dewatering, deep excavation, basement infiltration, borehole installation, testing and site remediation and an informative should be attached. Should there be any discharge of surface water into the public sewer, a prior approval from Thames water would be required.
- No objection with regard to the waste water network. sewage treatment work and water network infrastructure capacity. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9litre/minute at the point where it leaves Thames Waters pipes. The development should take account of this minimum pressure in the design of the proposed development. The site is located within 15m of Thames Water underground asset and the development could cause the assets to fail if appropriate measures are not taken. Developer should read our guide “Working near out assets” to ensure works are in line with the necessary processes.
- The development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. The prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities that may impact ground water resource. The applicant is encouraged to read the Environment Agency

approach to groundwater protection (www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitable qualified environmental consultant.

4.4 Historic England – No objection

No further assessment conditions are required for this development.

b) Local groups:

4.5 Lancing Road Resident Association – Objection

Objection is raised and the grounds of objection is summarized as follow:

The proposed development does not provide adequate parking provision and is not in keeping with the other houses in the area. The impact of the pandemic has resulted in a shift towards working from home and as this plays out more and more existing office space will become available for conversion into this type of housing provision. As such, there is an over-supply of these development in the area.

The vehicular entrance to the phase 1 development would be located opposite to an ambulance bay, close to the basement car park entrance associated to the residential block and the pay and display car park with buses traveling along Homefield Rise causing a road safety hazard. It is already very difficult to cross the road with many junctions where traffic can emerge. The proposal would introduce another point of emerging traffic and would have an adverse impact on road safety. There is already regular drug dealing taking place in the pathway between Mortimer Road and Lancing Road and the introduction of a poorly lit car park area nearby will encourage more antisocial behaviour.

c) Adjoining Occupiers:

4.6 Twenty-five (25) letter of support have been received and the grounds are summarised as below:

Proposal would be in keeping with the character of the area

- The proposal would provide a natural transition from the site to the old police station and surrounding houses. The proposal would fit in well with its surroundings, including the new development opposite to the site.
- The scale of the proposed development is acceptable when compared with the development opposite to the site. The height of the proposed buildings are acceptable and would not overlook the houses on Lancing Road. The existing houses are derelict and the proposal to redevelop the site would be acceptable.

Provision of housing and affordable housing

- The site is allocated for 100 units and more housing should be provided.
- The Council does not have a 5 year housing land supply and there are many people on the council's waiting list and in temporary accommodation. The site is close to public transport links and the High Street and is an ideal place to provide more housing.
- The proposal would provide affordable housing for local people.
- The proposal would provide much needed social housing and there is a lack of housing in the Borough.

Regeneration and improvement in the area

- The site has been boarded up for some time and semi-derelict. The proposal would regenerate the place and improve the environment and area.
- The proposal would improve to the High Street.
- Orpington needs radical improvement and the proposal would improve the current properties which are in deterioration.
- There is no coherent plan for Orpington and the new proposals are neither out of character nor do they impact on the adjacent properties, traffic or services.

Residential amenities

- The proposal would not have an adverse impact on residential amenities for the residents on Lancing Road in terms of privacy. The proposal is up to 4 storeys in height and it should be noted that the residential block opposite the site is already 9 storeys in height. The proposal would not have an adverse impact in terms of loss of light due to the orientation.
- The proposal would provide building trade and job opportunities.

Parking

- The proposal would provide adequate parking spaces for the future residents.

4.7 Fifty-six (56) letters of objection have been received and the grounds are summarised as below

Previous appeal dismissal reasons and site allocation (Addressed in para 6.3.1 -6.4.9, 6.4.1 -6.4.7)

- The previous appeal dismissal reasons in terms of the effect of the proposal on the character and appearance of the area and impact on neighbouring amenities has not been addressed. The tall building opposite the site is located within the town Centre and the application site poses a distinctly suburban presence on its edge. The scale and

height of the proposed building is not acceptable at this location and would have an adverse impact on the residential amenities on Lancing Road.

- The site should not be allocated for housing development to provide 100 residential units. This allocation should be removed from the Local Plan. Planning permissions for 105 and 103 units were received previously and this proposal should not be accepted.

Uncertainty of Phase 3 Development (Addressed in para 6.1.2 and 8.2)

- Phase 3 is not secured for redevelopment and planning permission should not be granted in the absence of any phase 3 development. The houses in between the two phases will have to put up with the proposed development and construction works for years. The proposal cannot be considered as a good design and desirable outcome.
- Two pair of semi-detached houses would be sandwiched in between the proposed blocks and would highlight the difference between high density urban living and a leafy suburban way of life.

Housing (Addressed in para 6.2.13 and 6.3.3)

- There are already 3 large scale residential developments in the area and the proposal is not needed in the area.
- Family housing is needed.
- More family housing is needed in Bromley, there are 43 flats being built above former shop at 257 -259 High Street and around 40-50 flats are proposed at 208 – 212 High Street. There are more plans to develop Orpington College and the Walnuts and there will be more flats than family houses.

Residential amenities (Addressed in para 6.3.1 -6.4.9 and 6.3.16)

Loss of privacy, loss of outlook, loss of light.

- The proposal would result in a wind tunnel effect towards the market square and the Walnuts centre.

Overdevelopment (Addressed in para 6.2.13 - 6.2.15, 6.38 – 6.3.10)

- The proposed building does not take into account the immediate context of the area.
- Excessive density and the proposal would provide over 40 additional units.
- The height of the proposed building should be limited to 2 storeys
- The highest part of the building would be towards the end of the block which is at the junction of Homefield Rise and Gravel Pit Way.
- The proposal is more suitable in an urban area rather than suburban area.

Inadequate outdoor space (Addressed in para 6.2.3 6.2.27)

- The proposal would be similar to the former police station site with no play area or garden area.
- Loss of green space and this is needed during the Covid 19.
- Lack of green space and play space for children and this could be provided above the car parking by providing a mezzanine level.

Design and character (Addressed in para 6.3.1 – 6.3.15, 6.5.10)

- The design and scale of the proposal is out of keeping and character. The principle to redevelop the land is supported as the current properties are falling into disrepair. However, the proposal would be facing Gravel Pit way and would be too close to the road. Orpington High Street can be extended to this site providing more local facilities.
- The proposal represents another example of demolishing perfectly good housing to build box houses leading to the loss of the suburban character of Orpington. Homefield Rise and Lancing road are family houses with large gardens and good wildlife. These houses provide a clear delineation between the town centre and the residential area. The height, scale and bulk of the proposed development is too high and excessive. Two to three storey town houses would be a better option.
- The access to phase one is via an “arch” and delivery van or wheelchair accessible mini buses between 2.5 metres and 3 metres high would not be able to reach the rear of the site.
- There are minor changes associated with this amended plan and this does not address the previous objections. The previous objections still apply and should be considered before planning permission is granted
- The revised proposal does not address the previous objections.

Sustainability and biodiversity (Addressed in para 6.6.1 to 6.6.11)

- The proposal would increase the hard-standing area and surface water risk. The Urban greening drawing indicates mature trees would be removed from the site and this does the opposite of what urban greening is intended to do.
- Bat survey hours are limited to 2 to 3 hours. Residents have evidence of bats existing in the area.
- The Tree survey was carried out in 2015 and an updated survey should be provided. The survey indicates that 6 trees will be removed with mitigation measures which are located outside the application site and under other ownership. The suggested mitigation measures imply there is an agreement with the neighbouring owner. The design access statement states that where trees are proposed to be removed, a replacement planting strategy is proposed. This is not an accurate statement as there has been no dialogue regarding replacing the trees proposed to be removed which currently fall outside the application site.
- Loss of trees.

Transport (Addressed in para 6.5.1 – 6.5.10)

- Inadequate off-street parking and on-street parking in the area.
- Increased level of traffic in the already busy area.
- The junction of Homefield Rise and Gravel Pit Way is extremely hazardous for pedestrians at present due to the lack of a pavement on one side of Gravel Pit Way. A safe crossing refuge should be included for any successful proposal.
- The proposal would be unsafe for pedestrians and people coming from Gravel Pit Way.
- Homefield Rise is the only access road to the whole of the Walnuts Estate, the Walnuts Leisure Centre and the car park for the High Street. The existing transport network cannot cope with the proposed development.

Pollution (Addressed in para 6.8.1 -6.8.5)

- Impact on air quality, noise and light pollution.

Inadequate infrastructure (Addressed in para 7.1)

- Inadequate utilities network, school and health facilities such as doctors surgeries.

Others

- The properties are bought and deliberately left in a poor state, similar to 21 Lancing Road.
- The proposal is supported by the occupiers of the site. Some of the supporters do not live near the site. There is no need to change Orpington into Croydon.
- The existing tenants would be removed from the site.
- Increased fire hazard. There was a fire at the Village Hall last summer and the residential units above remained unoccupied.
- There has been no consultation about this proposal, despite the claims from the developer. The application is submitted to the council during the summer and most of the people were away during the summer which limited the consultation responses.

5. POLICIES AND GUIDANCE

5.1 National Policy Framework 2019

5.2 NPPG

5.3 The London Plan

- 2.14 Areas for regeneration

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 3.14 Existing housing
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.14 Water quality and wastewater infrastructure
- 5.15 Water use and supplies
- 5.18 Construction, excavation and demolition waste
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public Realm
- 7.6 Architecture
- 7.8 Heritage and archaeology
- 7.13 Safety, security and resilience to emergency
- 7.14 Improving 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
- 7.21 Trees and woodlands
- 8.2 Planning obligations
- 8.3 Community infrastructure levy
- 8.4 Monitoring and review

5.4 Draft London Plan

- 5.4.1 The 'Intend to Publish' version of draft London Plan (December 2019) is a material consideration in the determination of this planning application. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are

unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework.

- 5.4.2 The draft New London Plan was submitted to the Secretary of State (SoS) on 9 December 2019, following the Examination in Public which took place in 2019. This was version of the London Plan which the Mayor intended to publish, having considered the report and recommendations of the panel of Inspectors.
- 5.4.3 The London Assembly considered the draft new London Plan at a plenary meeting on 6 February 2020 and did not exercise their power to veto the plan.
- 5.4.4 After considering the 'Intend to Publish' Plan, on 13 March 2020 the Secretary of State for Housing, Communities and Local Government wrote to the Mayor identifying directed changes to a number of policies in the draft plan. The SoS considered these changes were necessary to address concerns regarding inconsistencies with national policy. The Mayor cannot publish the New London Plan until the directed changes have been incorporated, or until alternative changes to address identified concerns have been agreed with the SoS. This could affect the weight given to the draft plan with regard to the directed policies.
- 5.4.5 At this stage, the Council's up-to-date Local Plan is generally considered to have primacy over the draft London Plan in planning determinations. However, where no modifications have been directed the draft London Plan policies are capable of having significant weight (as seen in a recent SoS call-in decision in the Royal Borough of Kensington and Chelsea). Where specific draft London Plan policies have been given particular weight in the determination of this application, this is discussed in this report.

5.5 Mayor Supplementary Guidance

- Housing (March 2016)
- Affordable Housing and Viability Supplementary Planning Guidance (Aug 2017)
- Energy Assessment Guidance (Oct 2018)
- Accessible London: Achieving an Inclusive Environment (2014)
- Sustainable Design and Construction (2014)
- Shaping Neighbourhoods: Character and Context (2014)

5.6 Draft London Plan

- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy

- GG6 Increasing efficiency and resilience
- SD6 Town Centres and high streets
- SD10 Strategic and local regeneration
- D1 London's form
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D11 Safety, securing and resilience to emergency
- D12 Fire safety
- D14 Noise
- H1 Increasing housing supply
- H4 Delivery affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H10 Housing size mix
- S4 Play and informal recreation
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- G9 Geodiversity
- SI-1 Improving Air quality
- SI-2 Minimising greenhouse gas emissions
- SI-3 Energy infrastructure
- SI-8 Waste capacity and net waste self-sufficiency
- SI 13 Sustainable drainage
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- Accessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- DF1 Delivery of the plan and planning obligations
- M1 Monitoring

5.7 Bromley Local Plan 2019

- 1 Housing Supply
- 2 Affordable Housing
- 4 Housing Design
- 30 Parking
- 31 Relieving congestion
- 32 Road Safety
- 33 Access for all

- 34 Highway Infrastructure provision
- 37 General Design of Development
- 46 Ancient Monuments and Archaeology
- 59 Public open space Deficiency
- 72 Protected Species
- 73 Development and Trees
- 74 Conservation and Management of Trees and Woodlands
- 77 Landscape Quality and Character
- 78 Green Corridors
- 79 Biodiversity and Access to Nature
- 113 Waste Management in New Development
- 115 Reducing Flood Risk
- 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 reduction, decentralised energy networks and renewable energy
- 125 Delivery and Implementation of the Local Plan

5.8 Bromley Supplementary Guidance

- Planning Obligations (2010) and subsequent addendums

6. ASSESSMENT

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

- Principle of Development
- Housing
- Design and layout
- Impact on Neighbouring Amenities
- Transport and Highways
- Trees and Biodiversity
- Energy and Sustainability
- Environmental Health - Air Quality
- Drainage

6.1 Principle of development - Acceptable

6.1.1 The application sites (Phase 1 and Phase 2) form part of the allocated site (Site 11 – No. 18 to 44 Homefield Rise) in the Bromley Local Plan (2019). Site 11 measures approximately 0.75 hectare in area and is surrounded by a mixture of residential and commercial properties, off Orpington High Street. Proposals in Site 11 will be required to:

- Deliver around 100 residential units (net increase in 87);
- Create an effective transition between the adjacent town centre and lower rise residential area; and,
- Respect the amenity of adjoining residential properties.

6.1.2 The application sites (Phase 1 and Phase 2) measure approximately 5,100sq.m in area and comprise 9 residential dwellings (No. 18 to 28 Homefield Rise and No.38 to 44 Homefield Rise). Whilst the current application does not cover the entire allocated site, a phasing plan is submitted which indicates the proposal and redevelopment of this allocated site is divided into three phases. The siting and layout of this proposal is designed to enable the entire allocated site to be redeveloped in accordance with the allocated policy requirements in the Local Plan. The applicant has advised that an option agreement is agreed with 3 of the Phase 3 land owners and that they are in discussion with the remaining owner with a view to the redevelopment for Phase 3.

6.1.3 For the purpose of this application, a phasing plan covering the entire allocated site - Site 11 is provided, which indicates the proposed layout in Phase 1 and Phase 2 is designed to ensure an acceptable layout covering all phases can be achieved and delivered. The phasing plan also indicates the proposal would not prevent the future redevelopment of Phase 3. It is acknowledged that the anticipated development in Phase 3 would be around 20 units as illustrated in the proposed plan and would be below the 100 units (net 87) as specified in the Local Plan. It should be noted that the proposal is designed to optimise the potential of the site. As such, it is considered that the quantum of the proposed units contained within the application sites, the siting and layout of the proposal including the phasing plan covering the entire Site 11 would be acceptable. An informative would be attached to any decision advising the applicants of the Site 11 Policy requirements.



Fig 11. Proposed site layout plan

- 6.14 This application covers Phase 1 and Phase 2. The phasing details of the entire Site 11 is tabled as follows:

| Phase 1/ Block A | Existing | Proposed |
|--|-----------------|--------------------|
| 18 to 28 Homefield Rise | 5 houses | 37 flats |
| Phase 2 / Block B | Existing | Proposed |
| 38 to 44 Homefield Rise | 4 houses | 31 flats |
| Phase 3 / Block C (N.B. Phase 3 does not fall part of this application) | Existing | Anticipated |
| 30 to 36 Homefield Rise | 4 houses | 22 flats |

6.2 Housing - Acceptable

Housing Supply

- 6.2.1 The current position in respect of Bromley's Five Year Housing Land Supply (FYHLS) was agreed at Development Control Committee on 24th September 2020. The current position is that the FYHLS (covering the period 2020/21 to 2024/25) is 2,690 units, or 3.31 years supply. This is acknowledged as a significant undersupply and for the purposes of assessing relevant planning applications means that the presumption in favour of sustainable development will apply.
- 6.2.2 The NPPF (2019) sets out in paragraph 11 a presumption in favour of sustainable development. In terms of decision-making, the document states that where a development accords with an up to date local plan, applications should be approved without delay. Where a plan is out of date, permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 6.2.3 According to paragraph 11(d) of the NPPF in the absence of a 5 year Housing Land Supply the Council should regard the Development Plan Policies for the supply of housing including Policy 1 Housing Supply of the Bromley Local Plan as being 'out of date'. In accordance with paragraph 11(d), for decision taking this means where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

6.2.4 The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. Table 3.1 of the London Plan (Policy 3.3) sets out housing target for Bromley is to deliver 641 new homes per year until 2025. The new/intended to published London Plan's minimum target for Bromley will be increased to 774 new homes per annum (between 2019/20 – 2028/29).

6.2.5 London Plan Policy 3.14 and Bromley Local Plan Policy H1 resist the loss of housing unless the housing is replaced at existing or higher densities with at least equivalent floor space. The proposal would replace 9 dwellings with 68 new residential units. This would represent an uplift of 59 units including 23 affordable housing.

6.2.6 The redevelopment of this allocated site making more efficient use of the land is considered acceptable and would positively contribute to the housing and affordable housing supply in the Borough. The site allocation policy requirements, planning merits and impacts of the proposal will be considered and assessed in line with the development plan. The overall planning balance of the proposal having regard to the presumption in favour of sustainable development is set out in the following sections of this report.

Affordable housing and tenure

6.2.7 The Council's draft Housing Strategy 2019-2029 recognises that there is an increasing need for housing and affordable housing in the Borough due to the rising population of Bromley. The latest Annual Monitoring report published by the Greater London Authority in October 2019 (Year 2017/2018) indicates that the net housing completion in Bromley was above the minimum housing target at 686 units. However, it should be noted that the number of affordable housing delivery remains lower than anticipated, recorded at 88 units.

6.2.8 Policies 3.11 to 3.13 of the London Plan and Policy 2 of Bromley Local plan seek 35 percent of affordable housing to provide by habitable room with a split of 60 percent affordable rent and 40 percent intermediate unit. In line with the emerging London Plan and the Mayor of London's Affordable Housing and Viability SPG (2017), if a scheme delivers 35 percent affordable housing and meets the tenure and mix requirements, it is able to proceed through the viability fast track route and does not

need to provide viability information. This approach is consistent with the Bromley Local Plan 2019 Policy 2.

6.2.9 The proposal would provide a total of 68 units (194 by habitable room) including 23 affordable housing units (69 by habitable rooms) with a mixture of 1 bed or 2 bed affordable rent and intermediate units.

6.2.10 The affordable housing units would be located in Phase 1. A total of 13 affordable units and 10 immediate units would be provided. The proposed affordable housing tenure would achieve a split of 60 percent affordable rent and 40 percent intermediate by habitable room and no viability assessment is required as the proposal would comply with the affordable housing policy requirements. The proposed housing and affordable housing tenure details are tabled as follows.

| Phase I | 1 bed | 2 bed | Total (by Unit) | Total (by Habitable room) |
|--|--------------|--------------|----------------------------|--------------------------------------|
| Market | 2 | 12 | 14 | 40 |
| Affordable Rent | 4 | 9 | 13 | 41* |
| Intermediate | 2 | 8 | 10 | 28 |
| Total | 8 | 29 | 37 | 109 |
| *6 of the affordable rent units is provided with a living room and a separate dining and kitchen room with internal floor area measures 13sq.m or above. | | | | |
| Phase 2 | 1 bed | 2 bed | Total (by Unit) | Total (by Habitable room) |
| Market | 8 | 23 | 31 | 85 |
| | | | | |
| Phase 1 and Phase 2 | 1 bed | 2 bed | Total (by Unit) | Total (by Habitable room) |
| Total | 16 | 52 | 68 | 194 |

6.2.11 Draft London Plan Policy H5 requires development to provide an early stage viability review if an agreed level of progress on implementation is not made within 2 years of the permission being granted or agreed with the LPA. This approach covers proposal considered under the “Fast Track Route”. Should planning permission be approved and in line with the GLA’s SPG guidance, a clause to manage and monitor the progress on implementation of the development should be secured in the S106 agreement.

Housing mix

6.2.12 Pursuant to Policy 3.8 of the London Plan, new residential development should offer genuine housing choice, in particular a range of housing sizes and types. London Plan Policy 3.9 states that communities should be mixed and balanced by tenure and household income, supported by effective design, adequate infrastructure and an enhanced environment.

6.2.13 It is noted that there are no larger family units (3 bedrooms or more) provided and the proposed housing size and mix would be limited to one and two bed units. However, it should be noted that the proposed accommodation would include a range of housing sizes up to 4 person occupancy and an acceptable range of tenures would be provided. Draft London Plan Policy H10 states that a higher proportion of one and two bed units is generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. Draft London plan Policy H10 also highlights the role of one and two bed units in freeing up family housing. The Council's Housing Division was consulted, and no objection was raised in respect of the proposed housing mix at this location. Given that the site is located within a highly sustainable location with good access to the local amenities and transport, it is considered that the proposed housing mix would be acceptable at this location.

Density

6.2.14 London Plan Policy 3.4 states that planning decisions should take into account local context and character, the design principles in Chapter 7 of the London Plan, public transport capacity, and that development should optimise housing output for different types of location within the relevant density range. This approach is supported by Bromley Local Plan Policy 2 and 37. Draft London Plan policy D3 emphasis on optimising site capacity through design-led approach.

6.2.15 The site is located within a transition area between dense development to the north adjoining to the Orpington Major Centre and domestic development to the south. The setting of the site is categorized as "Urban" with a mix of different uses, medium building footprints and typically buildings of two to four storeys in the area. The PTAL rating of the site is rated at 4 and the appropriate density range of this site is between 200-700 habitable rooms per hectare (HRH). The proposed residential density in each phase of the development and the proposed sites would comply with the relevant policies. The density level is outlined as follows.

| Policy range | Phase 1 | Phase 2 | Phase 1 and 2 |
|-----------------------|----------------|----------------|----------------------|
| 650–1100 hr/ha | 403 | 354 | 366 |

Standard of accommodation - Internal floor area

6.2.16 London Plan Policy 3.5 'Quality and design of housing developments' requires new housing to be of the highest quality internally and externally. The London Plan explains that the Mayor regards the relative size of all new homes in London to be a key element of this strategic policy issue. Local Plans are required to incorporate minimum space

standards that generally conform to Table 3.3 - 'Minimum space standards for new development.' Designs should provide adequately sized rooms and convenient and efficient room layouts. Guidance on these issues is provided by the Mayor's 'Housing' SPG 2016.

6.2.17 In March 2015, the Government published 'Technical housing standards - nationally described space standard.' This document deals with internal space within new dwellings 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 Minor Alterations to the London Plan 2016 and the Mayor's 'Housing' SPG 2016 reflect the national guidance.

6.2.18 All of the proposed units would meet or exceed the National Housing Standards minimum internal space standards and adequate internal living space would be provided. The ranges of the proposed internal floor areas would be as follows.

| | Policy requirements | Proposed internal floor area |
|-----------------------|----------------------------|-------------------------------------|
| 1 bed/2 person | 50sq.m | 50sq.m to 61sq.m |
| 2 bed/3 person | 61sq.m | 61sq.m to 63. 5sq.m |
| 2 bed 4 person | 70sq.m | 70sq.m to 71. 5sq.m |

Wheelchair unit and inclusive living environment

6.2.19 Paragraph 3.3 under London Plan Policy 3.1 states "The Mayor is committed to ensuring a London that provides equal life chances for all its people, enabling them to realise their potential and aspirations, make a full contribution to the economic success of their city - and share in its benefits - while tackling problems of deprivation, exclusion and discrimination that impede them. This includes understanding and addressing the physical and social barriers that prevent disabled people participating".

6.2.20 London Plan Policy 3.8 requires that 10% of new housing meets Building Regulation requirement M4(3) Wheelchair users dwelling; 90% of new housing meets Building Regulation M4(2) accessible and adaptable dwellings. London Plan Policy 7.2 requires new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.

6.2.21 Paragraph 2.3.10 under Standard 11 of the London Housing SPD states that LPAs should seek to ensure that dwellings accessed above or below the entrance storey in buildings of four storeys or less have step-free access.

6.2.22 The proposal would provide 7 wheelchair user units (4 in Phase 1 and 3 in Phase 2) which would be located on the ground floor providing a step

free environment. Internal lifts would be provided and would be accessible to all floors in each phase of the development. As such, it is considered that the proposal would achieve an inclusive living environment and would comply with the policies above.

Private outdoor space

6.2.23 Standard 26 and 27 of the London Housing SPD requires a minimum of 5sq.m private outdoor space to be provided for a 1 to 2 person dwelling and an extra 1sq.m to be provided for each additional occupant. The minimum depth and width of all balconies and other private extension spaces should be 1,500mm.

6.2.24 Paragraph 2.3.31 of the Housing SPD states "Private open space is highly valued and should be provided for all new housing development. Minimum private open space standards have *been* established in the same way as the internal space standards, by considering the spaces required for furniture, access and activities in relation to the number of occupants".

6.2.25 A private balcony would be provided for each residential unit. The proposed balcony is designed to comply with the minimum balcony size requirement. The balcony sizes would be as follows.

| | Policy requirements | Proposed balcony floor area |
|-----------------------|----------------------------|------------------------------------|
| 1 bed/2 person | 5sq.m | 5sq.m to 7. 5sq.m |
| 2 bed/3 person | 6sq.m | 6sq.m to 7. 5sq.m |
| 2 bed 4 person | 7sq.m | 7sq.m to 7. 5sq.m |

Child play

6.2.26 London Plan Policy 3.6 and draft London Plan Policy S4 seek to ensure that development proposals include at least 10 sqm per child of suitable play provision. Based on the proposed housing mix and tenure, the child yield of this proposal would be 20. A minimum of 200sq.m play space would be required in line with the London Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).

6.2.27 The proposed landscaping plan indicates that an outdoor play area would be provided in each phase of the development and this would measure approximately 373sq.m in total (288sq.m in Phase 1 and 85sq.m in phase 2). Whilst indicative play equipment is shown on the proposed landscaping plan, it is considered that these details including an updated landscaping plan incorporating adequate replacement planting should be secured by appropriate planning conditions. As such, it is considered that adequate child play areas can be provided within the site and the proposal would comply with the policies.

Secured by Design

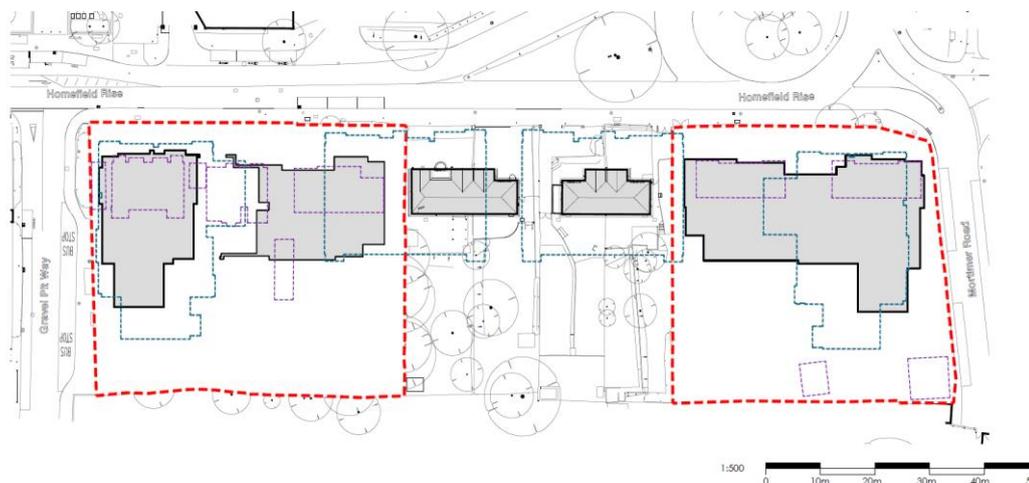
- 6.2.28 London Plan Policy 7.3 (Designing out crime) states development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. This approach is supported by BLP Policy 37 (General Design).
- 6.2.29 The proposed layout is designed to ensure a good degree of natural surveillance can be provided and achieved. The windows of the proposed buildings are designed to front Homefield Rise and its car park to the rear. The access to the proposed car parks would be secured by a gate. The design out crime officer was consulted, and no objection was raised in respect to the proposed layout, subject to a planning condition requiring the proposed development to achieve Design Out Crime accreditation. As such, it is considered that the siting and layout of the proposal would be acceptable and would comply with the policy.

6.3 Design and Layout - Acceptable

- 6.3.1 Development Plan policies require high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places. The Local Plan requires developments to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales. Development should be of an appropriate scale, height, mass, bulk and form in its site and context.
- 6.3.2 This allocated site is positioned between the town centre where high density development and night time economy is expected to take place in Orpington Town Centre and domestic properties where large scale development or non-residential activities are generally discouraged on residential roads such as Homefield Rise and Lancing Road, Walnuts Road to the east and beyond.
- 6.3.3 The site allocation policy does recognise the opportunities and challenging positions of this allocated site in delivering around 100 new home, as part of the Council's 5 year housing land supply. The policy requires development to create an effective transition between the town centre and residential area, and to respect to the neighbouring residential amenities, and these are the key planning consideration in determining this proposal. The appeal decision associated to the 2016 scheme is also relevant in considering this proposal.
- 6.3.4 The proposal is designed to address the shortcomings of the 2016 scheme in terms of the impact on character of the area and residential amenities on the neighbouring properties in terms of perception of being overlooked and sense of enclosure.

Proximity to the road

- 6.3.5 The front of the existing houses is positioned approximately 7 metres from the pavement. The domestic houses in the area are well spaced out with their front gardens and spacious rear garden areas which form part of the key local character and appearance as identified by the Planning Inspector. Para 11 of the appeal decision states *“The set back of the dwellings from the carriage way, in combination with the college car park opposite and maturely landscape highway verges coming to provide a sense of openness and spacious on the approach into and past the town centre from Homefield Rise and Lych Gate Road”*.
- 6.3.6 The buildings associated to the 2016 scheme were positioned very close to Homefield Rise with buildings positioning 1 metre from the pavement. The siting of the buildings failed to take into account the sense of openness and spaciousness of the site.
- 6.3.7 The proposed buildings (Phase1/ Block A and Phase 2/ Block B) would set in from the pavement between 5.5 metres and 8 metres from Homefield Rise. The distance of the proposed building has taken into account the distance between the existing houses and the road, which measures approximately 7 metres. The areas between the front of the proposed building and the pavement would also provide adequate opportunities to introduce adequate replacement planting and echo the mature landscaped highway verge located opposite the site. As such, it is considered the siting of the proposed building has taken into account the existing characteristics of the site and a good degree of speciousness between the front of the proposed buildings and pavement on Homefield Rise can be maintained. A siting and layout comparison between the current proposal and the previous scheme is attached below.



(N.B. Red line represents application sites; Green line represent the 2016 scheme; Area in grey represent the site coverage of the proposed buildings. The existing houses in phase 3 does not form part of the current proposal).

Roofscape

- 6.3.8 The tallest buildings (Block B and C) were placed at the centre of the site and did not correspond to the site topography in the 2016 scheme. Para 16 of the appeal decision states that “*there would be little rhythm to the roofscape as it steps down Homefield Rise, with the blocks set a different height and the 2 central blocks much tallest than Block D*”.
- 6.3.9 The application sites (Phase 1 and Phase 2) are located on a slope. The proposed buildings would be part three and part four storeys in height. The siting of the proposed buildings is arranged and designed to reflect the topography of the site with building heights dropping down from east to west when viewed from Homefield Rise. The maximum height of Phase 2/Block B would measure 76.95m AOD in height, dropping down to Phase 1/Block A with a maximum building height measuring 70.6m AOD. It is noted that Phase 3 does not form part of this application. However, the design of the proposed buildings (Phase 1/ Block A and Phase 2/Block B) have addressed the lack of roofscape issue as outlined in the previous appeal. The proposal is also designed to ensure the proposal would not compromise the future development of phase 3. As such, it is considered the proposed roofscape would be acceptable.
- 6.3.10 Furthermore, it should be noted that the proposed side elevation plans also indicate the height of the proposed building would also be dropped from 4 storeys to 3 storeys to its rear towards Lancing Road. This would also reflect the ground level of the application sites is lower than the houses on Lancing Road. As such, a degree of transition in height would be provided due to the proposed building heights and difference in ground levels.

Scale and massing

- 6.3.11 The maximum depth of Block A and Block D in the 2016 scheme was approximately 34.2 metres, with the rear walls positioned 8 metres from the boundary with Lancing Road. The maximum building height of the previous scheme was up to 13.9 metres.
- 6.3.12 The height of the proposed buildings in both phases would measure between 9.5 and 12.6 metres in height. The maximum depth of the proposed buildings would be 28.5 metres (ranging between 17 metres to 28.5 metres) and has been reduced when compared with the 2016 scheme. The proposed buildings would also set a greater distance to the boundary and would be positioned between 15m and 23.5 metres from its rear boundary. Whilst the height, scale and bulk of the proposed building would be increased when compared with the existing and surrounding houses, it should be noted that the scale and massing of the proposed buildings has been substantially reduced when compared with the 2016 scheme. It is considered that the proposed medium rise buildings would sit well in between high-rise development in town centre

and lower rise development with domestic houses to the south and east of the sites and this would create a good transition between the town centre and the domestic houses in the area.

6.2.13 The sites have a long street frontage on Homefield Rise. The side and rear elevations of the proposed buildings would also be visible from Gravel Pit Way and Mortimer Road. The proposed elevation plans indicate that there is a strong vertical emphasis on the proposed buildings. This approach does mirror the design and appearance of the part 4 to part 9 storey new residential block (Sapphire House) which is located opposite the site.



Fig 12 Street view of Sapphire House opposite the site.

6.3.14 The use of vertical and horizontal brick patterning adjacent to the windows, between ground and first floor and near the roof level would assist into preventing the buildings from appearing monolithic and provide a degree of visual interest. The windows and façade of the proposed buildings also play an important part in defining a building's character and their arrangement is an important element in breaking down the scale of building frontages. The elevational treatments of the proposed buildings including the arrangement of windows and balconies would provide a sense of rhythm, scale and proportion of the buildings. Consequently, it is considered that the design, scale and massing of the proposed building would reflect the site being situated in a transitional area. The scale of the proposal is considered to be appropriate achieving the envisage quantum of development at this allocated site. The design of the proposal would also provide a good degree of transition between the contrasting character of Town Centre and domestic residential area and would comply with policy requirements.

6.3.15 A materials condition is recommended to secure the final details and specifications for all the external materials.

6.3.16 Concern is raised regarding the proposal in that it would result in a wind tunnel effect towards the market square and the Walnuts Centre. The market square and Walnuts Centre is located approximately 84 metres

from the site and given the height of the proposed buildings would be limited to part3/part4 storeys, it is considered that the proposal would not have a significant impact upon the microclimate in area.

6.3.17 It is noted that Phase 3 is located in between the proposed sites (Phase 1 and Phase 2) and there is a potential that the existing houses in Phase 3 could remain in-situ, should there be any failure to secure the land ownership of the entire Phase 3. The applicant has entered into an option agreement with three of the owners of Phase 3 and is in discussion with a remaining owner to secure the ownership of a remaining property in Phase 3. Irrespective of the outcome of negotiations by the applicant, it should be noted that the Site Allocation policy to provide around 100 units would remain in the Bromley Local Plan to deliver additional housing. The proposed front elevation plans, and the CGI as illustrated in Fig 7 above indicates the proposal would also respond to the roofline of the existing houses located in Phase 3 should they be retained. As such, it is considered that the proposal has taken into account the conditions of the entire site, including the possibility of Phase 3 remaining undeveloped.

6.4 Impact on Neighbouring Amenities - Acceptable

6.4.1 The nearest residential properties that would be affected by this proposal are the residential flats in Sapphire House located opposite the site, the domestic houses located to the east and west of the site on Homefield Rise (number 6 to 12 and 46 Homefield Rise) and the domestic houses on Lancing Road (Number 21 to 45).

Loss of sunlight and daylight

6.4.2 The proposed buildings would be part three and part four storeys in height. The distance between the proposed building and the neighbouring buildings are as follows:

- Front to front distance between Phase 1/Block A and Sapphire House opposite to the site measures approximately 24 metres;
- Side to side distance between Phase 1/Block A and Number 12 Homefield Road measures 15.5 metres;
- The back to back distance between Phase 1 to the rear of the houses on Lancing Road (21 to 27 Lancing Road) measures over 50 metres;
- Side to side distance between Phase 2/Block B and 46 Homefield Rise measures 15 metres;
- Back to back distance between Phase 2/ Block B and Number 35 to 45 Lancing Road would be between 34.5 metres and 50.5 metres.

6.4.3 The proposed buildings would be positioned between 5 to 5.5 metres from Homefield Rise. The rear of the proposed building would be located between 15 metres to 23.5 metres from its rear boundary. Due to the distances between the proposed building and the neighbouring properties, it is considered that the proposal would not have an adverse

impact on neighbouring amenities in terms of loss of sunlight and daylight.

Loss of privacy to the neighbouring gardens, overlooking and sense of enclosure

- 6.4.4 Paragraph 22 of the appeal decision states that “ *the flank elevation of Block A and D would contain habitable room windows serving habitable accommodation and in Block D, balconies would be located at first second and third floor level which would result in overlooking to 10, 12, 16 and 48 Homefield Rise.*
- 6.4.5 The side habitable room windows would be installed with angled windows. The angled windows would comprise of an obscured glazed and a clear glazed window which would direct the view and outlook away towards Mortimer Road and Gravel Pit Way instead of the neighbouring gardens. The secondary habitable room windows would be installed with obscured glazed windows and this is not considered to result in overlooking. Louvred privacy screens would be introduced on the balconies and these are designed to address any potential and direct overlooking issues.
- 6.4.6 The use of angled windows, obscured glazed units and louvred privacy screens is not uncommon within an urban area. It is considered that the proposed measures would ensure that adequate privacy can be maintained for the neighbouring properties and a good living environment can also be provided for the future occupiers.
- 6.4.7 The 2016 scheme was considered to be in close proximity to the rear gardens on Lancing Road resulting in an increased sense of enclosure and perception of being overlooked. The proposal is designed to address these issues which were highlighted by the appeal decision.
- 6.4.8 Angled windows and louvred privacy screens would also be introduced on the rear elevations of the proposed buildings. It is considered that these measures would ensure a degree of privacy can be maintained between the proposed buildings and the neighbouring properties. It should be noted that the proposal would provide a greater distance between the proposed building and its rear boundary when compared with the 2016 scheme. The rear walls of the proposed building would be located 15 to 23.5 metres away from its rear boundary. The 2016 scheme was 8 metres. Furthermore, it should be noted that the height of the proposed buildings would be lower than the 2016 scheme. Given the distances to its rear boundary, it is considered that an acceptable level of privacy and outlook can be maintained for the current proposals.
- 6.4.9 Having regard to the above, the development is considered acceptable in that it would not have any significantly adverse impacts on the amenities of local residents including those occupiers of the adjacent sites.

6.4.10 In the unlikely event that the existing houses were to be retained and phase 3 not developed, the proposed floor plans indicate that the proposals would not have an adverse impact on the neighbouring residential amenities of the existing dwellings if they are retained and phase 3 is not completed. The flank walls of the proposed buildings (Phase 1 / Block A and Phase 2 /Block B) would be positioned approximately 2 metres from both side boundaries towards the existing dwellings (Phase 3). The rear wall would project 5 metres further than the neighbouring houses and a 45 degree line will be maintained between the proposed buildings and the adjoining houses in Phase 3. The secondary windows on the flank walls would be obscured glazed. As such, it is considered that the proposal would not have an adverse impact on neighbours' residential amenities.

6.5 Transport and Highways - Acceptable

Access

6.5.1 A communal vehicular access would be created leading to the proposed car park in each phase of the development. The access to Phase 1 would be via Homefield Rise and the access to Phase 2 would be via Mortimer Road.

6.5.2 The Council's Highway Division has requested an updated Stage 1 Road safety Audit be provided and that it takes into account the existing layout associated to the Health Centre opposite the site. This has been carried out in August 2020 and a Council's highway traffic team has attended the site when the road safety audit was carried out.

6.5.3 The road safety report indicates that the rear of large delivery vehicles could overhang the main carriageway whilst waiting outside the proposed gate. The applicant has confirmed that service and delivery vehicles including waste collection vehicles would be serviced from the road. As such, it is considered that this issue would not have an adverse impact on highway safety. It should be noted that the proposed gate would be located approximately 8 metres from the road.

6.5.4 The Road Safety Audit makes recommendation that the existing on street parking spaces on Homefield Rise located outside of the site should be removed to avoid any potential impact on sightlines and highway safety. The Council highway officer has advised that this issue was raised in the previous application and a planning obligation of £5,000 should be secured via a s106 legal agreement enabling the Council to monitor and carry out the works, if necessary. An amendment to the existing on-street parking spaces on Mortimer Road will be required and this works should be secured via a 278 agreement. The Council's highway division has also advised that should planning permission be recommended, that Stage 2 and 3 RSA's should be secured by a planning condition. Should planning permission be

granted, the recommended planning conditions including a car park management plan and a swept path analysis of construction vehicles should be attached.

Parking provision

- 6.5.5 Table 1 in the BLP Policy 30 (Parking) sets the off-street parking standard for new residential development and the standards, subject to the particular characteristics of the development and the public transport accessibility. The site has a PTAL rating of 4. The recommended parking standard for development falls within a range of PTAL 2 to 6 is 0.7 to 1 space per 1 or 2 bed unit.
- 6.5.6 A total of 42 parking spaces including 8 disabled spaces would be provided. The proposal would achieve a ratio of 0.62 spaces per dwelling which would be below the recommended policy requirement. However, consideration should be given to the fact that the site is located within an urban part of the Borough adjoining to Orpington High Street with 13 bus routes within 5 minutes walk from the site. Further consideration should also be given to the proposed housing size and mix as there is no family unit proposed. On balance, it is considered that the deficiency of less than 0.1 parking spaces per dwelling would not warrant as a reason to refuse this application as the site benefits from easy reach to the public transport network, including Orpington Railway Station which is located approximately 1,010 metres from the site. A car park management plan detailing the allocation and management of the residential parking spaces would be secured by a planning condition and this would enable the uses of the residential parking spaces to be optimised between the future occupiers. The Council's highway officers has also advised that a 2-year free car club membership should be secured via a S106 legal agreement.
- 6.5.7 The draft London Plan sets the minimum standards for electric charging facilities for residential development, a minimum of 20 percent (8.4 spaces) parking spaces should have active charging with passive provision for all remaining spaces. The applicant has confirmed the required active and passive electric charging will be provided in line with the draft London Plan. Subject to a planning condition securing a minimum of 9 active and 33 passive electric charging points, it is considered that adequate electric charging facilities can be provided to meet the need of the future residents and would comply with the policy requirements. These provisions and details would be secured by a planning condition.

Cycle Parking

- 6.5.8 Table 6.3 of the London Plan require 1 long stay cycle space be provided for each of the 1 bed unit and 2 spaces be provided for each of the 2 cycle. A minimum of 136 long stay and 2 further short stay cycle storage spaces would be required.

- 6.5.9 The proposed site layout and floor plans indicates that the required cycle spaces would be provided for each phase of the development. Subject to a planning condition to ensure the required waterproof cycle spaces will be provided and maintained during the lifetime of the development. It is considered that this part of the proposal would be acceptable.

Waste storage

- 6.5.10 Refuse collection would be undertaken on street from Homefield Rise. The Council's highway officer has advised that a planning obligation of £10,000 should be secured by a s106 legal agreement to monitor the servicing from the road for 5 years for any highway works may be required associated to this development. The contribution will be returned in 5 years if not used. A communal waste storage area would be provided in each phase of the development and would be located 18 metres from the road. The proposed floor plans indicate each of the communal waste storage areas would be able to accommodate the required waste and recyclable waste for the future occupiers. The Council's Waste Services was consulted, and no objection was received. As such, it is considered that the siting, location and waste storage provision would be acceptable.

6.6 Trees & Biodiversity - Acceptable

Trees

- 6.6.1 A tree survey including a tree constraint and protection plan is submitted which indicates 1 category B tree (T16), 13 category C trees (T2- Sycamore, T3- Sycamore, T4 - Ash, T5 – Sycamore, T15 – Ash, T36 - Leylandii, T38 - Juniper, T39 – Lawson cypress, T45 - Lawson cypress, T46 - Lawson cypress, T47 - Birch, T48 - Holly, T51 - Lawson cypress) and 6 category C hedges (G1 – Leylandii, G6 – Privet, G35 Privet, G37 Thuja, G50 – Leylandii, G52 – Leylandii) will be removed from the application sites. The Council's tree officer has reviewed the tree survey and raised no objection to the proposed works, subject to a satisfactory landscape plan. There are opportunities to incorporate high quality trees into the local street scene and a degree of supervision is likely to be required from an arboricultural consultant.
- 6.6.2 An indicative landscaping plan is provided which indicates new planting will be incorporated within the sites. Officers consider that native species of suitable quality and quantity should be incorporated and provided in order to ensure the biodiversity value of the sites can be maintained or improved. Subject to the details of the landscaping plan, it is considered that the proposal would be acceptable.
- 6.6.3 The submitted tree survey indicates that 5 category C trees and 2 category C hedges in the neighbouring gardens will be removed and this is subject to agreement with the relevant owners. Objections are

received on the grounds of ownership of the trees and hedges. There is a lack of communication between the applicant and the neighbouring properties regarding to the trees and the proposal. Concern has also been received regarding the survey date of the report which was dated in 2015.

6.6.4 The applicant has advised a rear boundary wall is proposed and this is in response to the previous objection raised by the residents regarding security issues. The applicant has advised that the boundary wall can be replaced with a boundary fence and these identified trees in the neighbouring gardens could be retained with adequate tree protective measures. Subject to the details of any updated tree survey including tree protection plan and boundary treatment covering the entire sites, it is considered that the use of a rear boundary fence would not be unacceptable in this instance. The applicant has also confirmed a further site visit has been carried out by the Tree Consultant in the updated tree report accompanying this application.



Fig 13 Indicative landscaping plan including child play areas

6.6.5 A Preliminary Ecological Appraisal dated July 2020 was submitted with the application which considers any likely impact of the scheme upon protected species inclusive of bats and badgers. The assessment found that the site does not lie within or adjacent to any statutory or non-statutory designated sites. The site is comprised mainly of amenity grassland, building, two water bodies and hardstanding.

Bats

6.6.6 There are a number of mature trees which were identified on site. However, the majority of these were considered to be too young or too thin to be suitable as bat roosts. There were several mature ivy covered sycamore trees situated towards the middle of the site in the rear

gardens of house 28. These three trees were considered to have low roosting potential, with no specific roosting features noted but with a covering of ivy on the trunk that may conceal features from view. The majority of the on-site habitats are considered to have low potential for commuting and foraging bats. Given that the sites are connected to other gardens to the properties to the rear, this could provide foraging habitat and connectivity to bats that may be in the local area.

- 6.6.7 A single emergence survey was carried out in August 2020 and no bat was recorded at the application sites. The dusk emergence survey was taken at the optimum time when bats are most active, at least 15 minutes before sunset until 2 hours after sunset in line with the Bat Conservation Trust (2016) guidelines.
- 6.6.8 The buildings were not resurveyed internally for roosting bats due to the current social distancing requirement. However, the previous internal surveys in 2017 indicate that there was no evidence of roosting bats. It was considered that there is a “low” sustainability to support roosting bats. Should planning permission be granted and prior to any demolition works commencing, it is considered that updated bat surveys including the roof and loft of the buildings will be required.

Badgers

- 6.6.9 No badger setts were located on or within close proximity of the site where access was possible. Mammal holes were identified in several of the rear gardens (garden 18, 24, 28) but these were considered to be in use by foxes. No badger latrines or snuffle holes were identified on site and no badger hairs were found on fence lines.

Great Crested Newts

- 6.6.10 Two water bodies were identified. Pond 1 in the rear garden of 22 Homefield Rise at the time of the previous survey (2016) was considered to contain ‘poor’ habitat suitability for great crested newts. The pond was small and highly shaded due to encroaching scrub and surrounding trees. The water level was also low at the time of survey and very few ponds were present in the local area. During the update survey in 2020, the pond was almost dry and scrubbed over. There was no open standing water. Pond 2 in the rear garden of No, 40 Homefield Rise was previously a small concrete fish pond. During the update survey, the pond had been drained and filled with rubbish. As such, foraging opportunities is considered to be little.

Reptiles

- 6.6.10 The majority of the site consisted of buildings, short sward amenity grassland and hard standing, all of which provide negligible foraging potential for reptiles, lacking the abundance or diversity of invertebrate

prey required by common reptile species. It is considered that there is limited potential to support common reptile species.

6.6.11 Should the application be considered acceptable overall, tree and ecology conditions, to include the requirement for additional planting along the southern site boundary and the provision of ecological enhancements such as bat and bird boxes, would be recommended.

6.6.12 Overall, it is considered that the impact of the proposal on biodiversity would be acceptable.

6.7 Energy and Sustainability - Acceptable

6.7.1 Paragraph 153 of the NPPF states that in determining planning applications, LPAs should expect new developments to comply with policies and requirements for decentralised energy supply unless this is demonstrated to not be feasible or viable. Policy 5.1 of the London Plan seeks an overall reduction in carbon dioxide emissions whilst policy 5.2 of the London Plan and policy 124 of the Local Plan state proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the GLA energy hierarchy. Policy SI 2 of the Intend to Publish London Plan requires major residential development how the zero carbon target for residential developments will be met, with at least a 35% on-site reduction beyond Part L 2013.

6.7.2 An updated Energy Assessment following the GLA energy hierarchy has been received and this has been reviewed by the Council's Energy officer. Under the "Be Lean" category, a range of passive design features and demand reduction measures such as glazing design and specification, wall insulation, mechanical and natural ventilation through openable windows are proposed to reduce the carbon emission of the proposed development. These measures would meet the minimum 10 percent requirement as outlined in the GLA energy guidance and this is considered acceptable.

6.7.3 As there is no district network in the area, it is not possible to achieve any carbon reduction under "Be Clean" category at the present time and no reduction can be awarded.

6.7.4 A range of on-site renewable energy technologies including solar thermal, solar PV panel, hydroelectric, wind turbines, heat pumps and biofuel were considered. It is considered that the use of solar panels (equates to 360sq.m and 52kWp) would be the most feasible option for this site. The carbon reduction calculation is tabled as follow:

| Scenario – Whole Scheme | Regulated CO ₂ emissions (Tonnes CO ₂ /annum) | CO ₂ reduction (%) | Cumulative CO ₂ reduction (%) |
|-------------------------|---|-------------------------------|--|
| Baseline | 80.75 | - | - |
| Be Lean | 72.53 | 10.18 | 10.18 |
| Be Clean | 72.53 | 10.18 | 10.18 |
| Be Green | 51.99 | 28.32 | 35.62 |

6.7.5 The assessment indicates that the total regulated carbon saving on the site would achieve 35.6 percent (28.32 tonne on-site carbon saving) against Part L 2013 of the Building Regulations Compliant Development. In line with the GLA Energy Assessment Guidance, the shortfall of 64.4 percent percent carbon saving, equivalent to 51.99 tonne (£93, 582) would be secured by a S106 legal agreement.

6.7.6 A condition is recommended to secure the carbon saving measures as set out in the energy strategy report. Details of the siting and design of solar panel and related equipment to be installed at the site should also be secured by condition to ensure a satisfactory visual impact is achieved.

6.8 Environmental Health - Acceptable

Air Quality

6.8.1 London Plan Policy 7.14 minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plan.

6.8.2 An air quality assessment is submitted which assess the likely effects of the proposals on the site and the surrounding area in terms of air quality. The site is located over 5, 000 metres away from the Air Quality Management Area. The assessment indicates the proposal would not have an adverse impact on air quality, except mitigation would be required during the construction phase of the development. The assessment has been reviewed by the Council's Environment Health and no objection has been raised, subject to a construction management plan in line with the Council's Control of Pollution and noise from demolition and construction site code of practice 2017.

6.8.3 In accordance with the London Plan, all construction plant would need to adhere to the emissions standards for NO₂ and PM₁₀ (particles with a diameter up to 10µm) and PM_{2.5} (particles with a diameter up to

2.5µm) set out for non-road mobile machinery (NRMM). Subject to the planning conditions, it is therefore considered the likely effect of construction plant on local air quality would not be significant. Overall, the development is considered acceptable from an air quality perspective.

Noise and light pollution

- 6.8.4 The site is located within an urban area and is not subject to any land contamination. The proposal to intensify the residential use of this site would not result in any change in terms of land use and is compatible to its surrounding area. The proposed buildings would be located approximately 15 metres to 23.5 metres from its rear boundary and it is considered that the proposal would not give rise to undue harm in terms of noise or light pollution.
- 6.8.5 The proposed car park would be secured by a gate and the parking spaces would be limited to 22 spaces in phase 1 and 20 spaces in phase 2 to be used by the future occupiers. It is considered that the proposed car park would not give rise to any unacceptable level of noise. The details of external lighting in the car park would be secured by a planning condition.

6.9 Flooding and Drainage - Acceptable

Surface water drainage

- 6.9.1 Policy 5.13 of the London Plan seeks to ensure that development proposals include sustainable urban drainage system that aim to return water run-off rates back to greenfield levels and manage surface water runoff as close to source as possible. The NPPF states that major development should incorporate sustainable drainage systems which should take account of advice from the lead flood authority; have appropriate proposed minimum operational standards; have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and where possible, provide multifunctional benefits. Policy SI.13 of the Intend to Publish London Plan sets out the drainage hierarchy.
- 6.9.2 The application site is not located in an area at risk of river or sea flooding as defined by the Environment Agency. Due to the topography of the site, the south-west corner of the application site in phase 1 associated to the gardens of 18 and 20 Homefield Rise is subject to a low to high risk of surface water flooding. The land level within phase 1 varies between 57.2m AOD and 67.5m AOD and the land level within phase 2 is between 53.38m AOD and 67.71m AOD.
- 6.9.3 The impermeable area of the application sites would be increased from approximately 1,376sq.m to 3,000sq.m as a result of this proposal. A flood risk assessment including a surface water management strategy is

submitted which demonstrates how surface water run-off of the site can be managed with the following measures:

- Minimum land level of phase 1 be set at 57.6m AOD;
- Use of rainwater harvest – water butts;
- Use permeable servicing materials in the car parks;
- Soakaway systems;
- maintenance of the above measures during the life time of the development.

6.9.4 The submitted drawing indicates the minimum land level of phase 1 would be 58m AOD. A soakaway system with a volume of 170 cubic metres would be installed in each phase of the development. Permeable paving totalling 562 square metres would be created within the sites. The Council's drainage officer has raised no objection to the proposal and the measures contained in the submitted flood risk assessment. Subject to the measures to be implemented in full as outlined and the maintenance responsibility detail of the soakaway systems including the above measures to be secured by planning conditions, it is considered that the proposed measures would be acceptable and would comply with the policies above.

7. OTHER ISSUES

CIL:

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

Heads of Terms:

7.2 The following planning obligations will need to be secured as part of an S106 legal agreement, which the applicant has agreed to in principle, should permission be granted:

- Education £ 156, 738.28
- Health: £ 79,557
- Energy £ 93, 528
- Highway £15, 000
- Early stage affordable housing review in 2 years
- 2 Year car club members and a minimum of 20 hours of free dwelling time per dwelling.
- Obligation monitoring fee: £500 per head of terms

7.3 These obligations meet the statutory tests set out in Government guidance, i.e. they are necessary, directly related to the development and are fairly and reasonably related in scale and kind to the development.

8. CONCLUSION

- 8.1 The redevelopment of the site to provide more housing would accord with the Site Allocation policy requirements in the Bromley Local Plan. The proposal would provide much need housing and affordable housing in the Borough at a sustainable location.
- 8.2 Whilst this proposal covers the first 2 phases of the development, a phasing plan is provided which indicates the proposal would not compromise the remainder of the allocated site being brought forward for development. The applicant has advised that an option agreement is agreed with 3 of the land owners in Phase 3 and is in discussion with the remaining owner with a view to redevelop Phase 3.
- 8.3 The proposal is designed to address the shortcomings of the 2016 scheme. The siting of the proposed building has taken into account the issues raised in the previous appeal in respect to the character and appearance and impact on neighbours' residential amenities.
- 8.4 The proposed would provide adequate internal and external living spaces and would provide adequate parking spaces to accommodate the need for the future occupiers. A car park management plan to manage and optimise the use of the car parks and a 2 year car club membership with 20 free driving hours per dwelling would be provided. The application demonstrates that the traffic and parking provision would not have a significant impact on local highways infrastructure or road safety and the proposed parking and access arrangements are acceptable.
- 8.4 Subject to compliance with the recommendations in the technical reports and implementation of the recommended works and survey being undertaken where necessary, no protected species would be adversely affected and the development has the potential to enhance the biodiversity value of the site.
- 8.5 Furthermore, the development is considered acceptable from a sustainability, air quality and environmental health perspective.
- 8.6 Consequently, there are no material planning considerations which indicate that the application should be refused. The application is recommended for permission, subject to conditions and the prior completion of a S106 legal agreement.

RECOMMENDATION: PERMISSION SUBJECT TO LEGAL AGREEMENTS

SUMMARY OF CONDITIONS AND INFORMATIVES

Standard Conditions:

1. Time limit of 3 years
2. Drawing numbers

Pre-Commencement Conditions:

3. Construction and Environmental Management Plan
4. Arboricultural method statement and Tree Protection Plan including the rear boundary treatment
5. Bat surveys

Above Ground Construction Conditions:

6. Secure by Design
7. Landscaping
8. Bicycle parking
9. Energy Statement including solar panels
10. Child play equipment
11. Details of external materials
12. Electric charging points (active and passive)
13. Privacy screening
14. Stage 2 Road Safety Audit

Prior to occupation conditions:

15. Car park management plan
16. Parking spaces and turning spaces in accordance with approved details
17. Stopping-up of existing access
18. Stage 3 Road Safety Audit
19. Cycle storage

Compliance conditions:

20. Surface Water Drainage
21. Hardstanding for wash-down facilities for construction vehicles
22. All Non-Road Mobile machinery to comply with relevant emissions standards
23. Wheelchair units
24. Parking spaces
25. Refuse storage provision

Informatives

- Mayoral CIL

- **Secured by Design**
- **Dust Monitoring**
- **Vehicle crossover application**
- **Thames Water (various)**
- **Site 11 policy requirement**