

Committee Date	01/12/2021		Agenda Item:
Address	32 Homefield Rise Orpington BR6 0RU		
Application number	21/03220/FULL1	Officer Jessica Lai	
Ward	Orpington		
Proposal	Demolition of number 34 and 36 Homefield Rise, retention of number 32 Homefield Rise. Formation of new access and erection of a part 3/part 4 storey block containing 17 apartments with 14 car parking spaces, cycle store and refuse store.		
Applicant		Agent	
Lansdown Goldman Klein & Clarion Housing Group Press House Crest View Drive Petts Wood BR5 1FE		Robinson Escott Planning Downe House 303 High Street Orpington BR6 0NN	
Reason for referral to committee	Major Application. Outside Delegated Authority	Councillor call in Yes	

RECOMMENDATION	<u>Approve, subject to planning condition and s106 legal agreement.</u>
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KEY DESIGNATIONS
Area of Archaeological Significance Biggin Hill Safeguarding Area London City Airport Open Space Deficiency

Residential Use – Phase 3 (No. 32, 34 and No. 36 Homefield Rise)			
	Number of bedrooms per unit (habitable room)		
	1 bed	2 bed	Total
Market	5 unit (16 habitable room)	6	11
Affordable rent	3	1	4
Intermediate	0	2	2
Total	8	9	17

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	N/A	14	+ 14
Disabled car spaces	N/A	1	+1
Cycle	N/a	24	+24

Electric car charging points	100 percent (3 Active and 11 Passive)
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Representation summary	A 28 day neighbouring consultation letters were sent on the 20 th August, 2021. A site notice was placed at the application site on the 30 th September, 2021. The application was also advertised in the News Shopper on the 25 th August 2021.	
Total number of responses		30
Number in support		10
Number of objections		20

Section 106 Heads of Term	Amount	Agreed in Principle
Carbon offset	£ 7,125	Yes
Affordable housing	6 affordable housing comprise of 4 affordable rent (3 x 1 bed and 1 x 2 bed) and 2 intermediate units (2 bed).	Yes
Affordable housing viability	Review mechanism	Yes
Legal monitoring fee	£ 500 per head of term	Yes
Total	£ 8,625	Yes

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site forms part of an allocated site 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 existing two houses (N0. 34 and 36 Homefield Rise) would be replaced by the proposal. Number 32 Homefield Rise would be retained. The applicant remains open for further discussion with the remaining owner of Site 11.
- The proposal would provide 17 residential unit including 6 affordable housing and this provision including review mechanism would be secured by a s106 legal agreement. The proposal would positively contribute to the Council's five year housing land supply.
- The design, layout, scale and appearance of the proposal would echo the approved phase 1 and phase 2 development. The proposal is designed to achieve a good quality living environment and would not have a significant impact on the neighbouring residential amenities.
- 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. Adequate parking and cycle storage facilities would be provided on site 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 planning conditions, 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 site forms part of the allocation site in the adopted Bromley Local Plan 2019 - (Site 11 – Homefield Rise for housing development providing around 100 residential units).
- 1.2 The application site comprises of three semi-detached houses (number 32, 34 and 36 Homefield Rise) and measures approximately 1, 800sq.m in area. The site is adjoining to number 30 Homefield Rise to the west and is situated between the approved Phase 1 and Phase 2 development, which was approved in November 2011 (ref:20/02697/FULL1). This approved development would provide 68 residential units. The demolition works for Phase 1 have commenced in the past few weeks.
- 1.3 The site is adjoining to the rear gardens of the detached houses on Lancing Road. Opposite to the site is a part 4 to part 9 storey residential

block and there is a public accessible surface level car park adjacent to this building. The site is located to the south of Walnuts Shopping Centre, Orpington College and adjacent to Orpington Town Centre.

- 1.4 The site is located on a slope. The ground level of the site drops down 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 on Lancing Road. There are no trees with Tree Preservation Orders within the site.
- 1.5 The public transport accessibility of the site on Homefield Rise is rated at 4. There are 17 bus routes (numbered 51, 61, 208, 353, 368, B14, R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11) within a 2 to 5 minute 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 subject to surface water flooding. The road outside the application site is subject to low risk surface water flooding.
- 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, 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 to 237 Orpington High Street (Nat West Bank). The Priory Conservation Area is located over 530 metres north from the site.



Photo 1. Front of the application site, including Phase 1.

2. PROPOSAL

- 2.1 Full planning permission is sought for the demolition of number 34 and number 36 Homefield Rise, erection of a part three and part four storey building to provide 17 private residential flats with 14 off-street parking spaces.
- 2.2 The proposed building would be part three storey and part four storey in height with a private car park and an area of outdoor space located to the rear of the proposed building. The proposed building would measure approximately 21 metres wide, 22 metres long, 9.5 metres high to the top of third floor and 12.6 metres high to the top of fourth floor. The height of the proposed building would drop down from east to west which reflects the topography of the site and the approved development in Site 2. The external finishes of the building would be brick and brown in colour.
- 2.3 A total of 17 residential units (43 habitable rooms) would be provided comprising of 8 x 1 bed/2 person unit, 5 x 2 bed/3 person and 4 x 2 bed/4 person. The proposal would provide 6 affordable housing units (15 by habitable rooms), achieving 35 percent affordable housing with a mixture of 1 bed or 2 bed affordable rent and intermediate units.
- 2.4 The internal floor spaces of the proposed units including the private outdoor spaces are well laid out and would meet the required internal and private outdoor space requirements. A child play area will also be provided within the site.
- 2.5 A private car park would be provided to the rear of the building with a total of 14 parking spaces including a disabled parking space provided within the site. Three active electric charging points would be provided, and the remaining eleven spaces would be provided with passive electric charging points.



Homefield Rise Proposed Street Scene:

Fig 1. Proposed street elevation

3. RELEVANT PLANNING HISTORY

- 3.1 Full planning permission was granted for the 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) on the 20th December 2020 (20/02697/FULL1).

The approved housing and affordable housing mix for Phase 1 and Phase 2 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

- 3.2 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).

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 units 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.

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 Highway – No objection

Access

The existing accesses to individual houses will need to be stopped up at the cost of the developer. A communal access to the car park would be provided off Homefield Rise. A Stage 1 Road Safety Report is provided and has demonstrated the proposal would not have an adverse impact on highway safety. Swept Path Analysis is provided and confirmed vehicles can enter and leave the site in a forward gear.

Parking

The proposed parking ratio is 0.82 spaces per dwelling. The right for the future residents to apply for a parking permit should be removed. A car park management plan, service and delivery plan should be secured by a planning condition.

Cycle parking

Dedicated cycle storage area would be provided and this provision should comply with the London Plan requirements.

Waste Storage

The Council's Waste services should be consulted regarding to waste provision.

4.2 Drainage (lead local flood authority) – No objection

Prior to any development commencing on site, the design detail and measures to be implemented and in line with the submitted Flood Risk Assessment (issue 2 revision 4 dated 11/06/2021) shall be submitted to and approved by the Local Planning Authority.

4.3 Historic England (Archaeology) – No objection

Based on the information submitted, it is considered that no further assessment or conditions are therefore necessary.

4.4 Thames Water – No objection

Waste comments

Thames Water would advise that no objection is raised if the developer follows the sequential approach to the disposal of surface water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

There are public sewers crossing or close to the site and it is important that the risk of damage is minimized. Thames water will need to check the development does not limit repair or maintenance activity or inhibit the services provided in any other way. A petrol / oil interceptor be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

The proposed development is located within 15 metres of a strategic sewer. A piling method statement should be secured by a planning condition prior to any piling works took place.

Thames water raise no objection with regard to waste water network and sewage treatment works infrastructure capacity. Developer is reminded that a permit will be required for the discharge of ground water.

Water comments

Thames water must be notified prior to the use of mains water for construction purposes or potential fines may be issued for improper usage. Based on the information provided, no objection is raised to water network and water treatment infrastructure capacity. An informative advising Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes shall be attached. The developer should take

account of this minimum pressure in the design of the proposed development. The development boundary falls within a Source Protection Zone for groundwater abstraction which means these zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection and may wish to discuss the implication for their development with a suitably qualified environmental consultant.

b) Local groups

- **Lancing resident association - Objection**

It appears the members of DCC were misled in agreeing Phase 1 and Phase 2 development in November 2020. The developers have advised that Phase 3 covering number 30 to 36 Homefield Rise would be purchased and replaced by 22 apartments with a height on par with the existing houses, enabling a full redevelopment of Homefield Rise and avoid an undesirable situation of having existing housing between blocks of flats

The current proposal covers half of the Phase 3, replacing two houses for 17 apartments with an added storey. This will result in two semi-detached houses (numbers 30 & 32) being located between blocks of flats on each side. The proposal would represent a cramped development and of a high density which was previously rejected by the Planning Inspectorate in determining the earlier scheme in 2016. Lancing Road Residents Association and the residents objected to this proposal and considered that the proposal would be refused for the following reasons:

- a) the proposal is materially different from the information presented and agreed by the Council;
- b) replacing 2 houses with 17 flats represents over development and is denser than originally expected;
- c) the added height will create overlooking issues to neighbouring properties;
- d) Impact on street scene with 2 semi-detached properties surrounded by blocks of flats and this represent very poor design / planning.

The proposal is significantly different when Phase 1 and Phase 2 development was considered. The proposal would represent an undesirable development and should not be supported.

c) Adjoining Occupiers

Ten (10) letters of support have been received and the grounds are summarised as below:

1. The proposal will provide much needed housing and improve the area

2. The proposal would be in keeping with the High Street.
3. The site is allocated in the Local Plan for housing. The proposal would be in keeping with Phase 1 and Phase 2 development.

Twenty (20) letters of objection have been received and the grounds are summarised as below:

Grounds

1 Highway and traffic (addressed in section 6.5)

- Turning right from Gravel pit way to Homefield is already a hazard and the proposal would increase the traffic/pedestrian link in this area.
- No parking provision for 32 Homefield rise
- Increase traffic, parking pressure, accident and road hazard in the area

2 Impact of residential amenities (addressed in section 6.4)

- The location of proposed play space would be close to number 30 Homefield rise causing noise, disturbance, loss of privacy and impact on the wellbeing.
- Loss of sunlight to no. 30 Homefield Rise
- Loss of outlook and privacy

3 Infrastructure (addressed in section 7)

- Inadequate infrastructure to support the development

4 Overdevelopment (addressed in section 6.1 and 6.3)

- Phase 3 development is far denser than the approved development in Phase 1 and 2. The overall density and development at the remaining Phase 3 would exceed the original agreed units that was envisaged by the council when permission was granted for Phase 1 and Phase 2.
- Number 30 Homefield Rise is not sold to the developer. There is no assurance the remaining phase 3 can be developed and is much denser than the 2016 dismissed scheme.
- The approved plan indicates that the proposal would provide 22 units including Number 30 and 32 Homefield Rise.
- It appears the members were misled in approving Phase 1 and Phase 2 development.
- Additional storey is added.

- Cramp development and the proposal is deviated from the original proposal in terms of height, density and appearance with a much larger footprint.
- The pandemic has proven outdoor spaces is needed instead of flats.
- The proposal would be taller than the Phase 1 and 2 development
- The proposal would not provide family housing.

Other

- The former residents of Homefield Rise should not be taken into account.
- The owner/occupiers of homefield road are being forced out of their homes for this development.
- The original plans for phase 3 should be implemented.
- The submitted planning statement para 6.12 states “The scheme that now comprises Phase 3 simply replicates the layout and design style of the consented buildings. Indeed, the Phase 3 proposal was shown indicatively on the overall Masterplan at the time that Phases 1 & 2 were approved. This statement is grossly misleading.

5. POLICIES AND GUIDANCE

5.1 National Policy Framework 2021

5.2 NPPG

5.3 The London Plan 2021

- 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

5.4 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)

5.5 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

5.6 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
- Environment health
- Drainage

6.1 Principle of development – Acceptable

6.1.1 Site 11 covering No.18 to No. 44 Homefield Rise is allocated for housing development in the Bromley Local Plan (2019). Proposals in Site 11 will be required to: -

- Deliver around 100 residential units;
- 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 An earlier planning application associated to part of this allocated site covering the properties between number 18 to 28 Homefield Rise (Phase 1) and number 38 to 44 Homefield Rise (Phase 2) for 68 residential units was granted in November 2020 (ref: 20/02697/FULL1).

6.1.3 A phasing plan was submitted in this earlier approved scheme (ref: 20/02697/FULL1) which shows how the development within Site 11 are intended to be connect to subsequent phases of the development. An illustrative block and massing of “Phase 3” (covering No 30, 32, 34 and 36 Homefield Rise) was illustrated on the phasing plan. It is important to note that “Phase 3” as illustrated in the earlier scheme does not form

part of the earlier approved development which was set out in the published planning committee report (Para 2.2, 6.12, 6.13 and 6.14 in the earlier report).

- 6.1.4 The current application site (Phase 3) forms part of the remaining allocated site (Site 11). The site comprises of number 32, 34 and 36 Homefield Rise. Number 34 and 36 Homefield Rise will be demolished and replaced by a part 3 and part 4 storey building. Number 32 Homefield Rise will be retained. The applicant had negotiated with the remaining freeholder for the redevelopment of the remaining Site 11. The applicant remains open for negotiation and discussion, should relevant parties decide to come forward. Irrespective of the outcome of the negotiation and discussion, the merit of current proposals should be considered in line with the adopted Development Plan without further delay.
- 6.1.5 The current proposal would provide 17 residential units and is designed to ensure the current proposal would not result in the future development if progressed coming forward. The quantum of housing development for Site 11 in the Local Plan is around 100 units. Along with the approved Phase 1 and Phase 2 development, the proposal would achieve a total of 85 residential units. As such, the quantum of this proposal is considered to be proportionate to the allocated site plan requirements. An informative would be attached to any decision advising the applicants of the Site 11 Policy requirements.

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 2nd November 2021. The current position is that the FYHLS (covering the period 2021/22 to 2025/26) is 3,245 units, or 3.99 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 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. The new London Plan's minimum target for Bromley is 774 new homes per annum (between 2019/20 – 2028/29).

6.2.5 Bromley Local Plan Policy H1 resists the loss of housing unless the housing is replaced at existing or higher densities with at least equivalent floor space. The proposal would replace 2 dwellings with 17 new residential units. This would represent an uplift of 15 residential units including 6 affordable housing units (4 affordable rent unit and 2 intermediate units).

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 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 March 2021 (Year 2018/2019) indicates that the net housing completion in Bromley was above the minimum housing target at 709 units. However, it should be noted that the number of affordable housing delivery remains lower than anticipated.

- 6.2.8 London Plan Policy H4 sets a strategic target for 50 percent of all new homes delivered across London to be genuinely affordable. A minimum of 30 percent affordable housing of which a minimum of affordable rent or social rent, a minimum of 30 percent intermediate products should be provided. The remaining 40 percent to be determined at local level.
- 6.2.9 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 the proposal which is 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.
- 6.2.10 Policy 2 of Bromley Local plan seeks 35 percent of affordable housing to be provided by habitable room with a split of 60 percent affordable rent and 40 percent intermediate unit. In line with 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, subject to an early-stage review mechanism being secured in a legal agreement.
- 6.2.10 A total of 17 residential units (43 habitable rooms) including 6 affordable housing units (15 by habitable rooms) with a mixture of 1 bed or 2 bed affordable rent and intermediate units. This would achieve 35 percent affordable housing provision and a split of 60 percent affordable rent and 40 percent intermediate requirements. In line with the London Plan, an early review mechanism is required to be secured by s106 and this approach is consistent with the approved development in Phase 1 and Phase 2.
- 6.2.11 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. 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. It also highlights the role of one and two bed units in freeing up family housing. The Council's Housing Division was consulted, and no issue 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.
- 6.2.12 Objections were raised regarding to the density of the proposal. The new London Plan promotes higher density development, particularly in

locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. There is no density matrix in the London Plan and a design-led approach is applied to determine the optimum development capacity of site. It is noted that the proposed residential density would be significantly higher than the existing. However, it should be noted that the quantum of the proposed housing within the site would reflect the policy requirement for around 100 units. As such, it is considered that making more efficient use of this allocated site at this suitable location would not be inappropriate with good connections to services and transport in the area.

Standard of accommodation - Internal floor area

6.2.13 The NPPF para 127 sets an expectation that new development will be designed to create places that amongst other things have a ‘high standard’ of amenity for existing and future users.

6.2.14 In March 2015, the Government published 'Technical housing standards - nationally described space standard.' This document 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. This is supported by the Mayor's 'Housing' SPG 2016 reflect the national guidance and BLP Policies 4 and Policy 37.

6.2.15 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	50 to 62sq.m
2 bed /3 person	61sq.m	61sq.m
2 bed /4 person	70sq.m	72 to 74sq.m

Wheelchair unit and inclusive living environment

6.2.16 Many households in London require accessible or adapted housing to lead dignified and independent lives. London Plan Policy D7 states 10 percent of proposed new dwellings to meet Building Regulation requirement M4(3) Wheelchair users dwelling standard. The remaining dwellings should meet Building Regulation M4(2) accessible and adaptable dwellings.

6.2.17 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. A private wheelchair user unit will be provided on the ground floor with a dedicated disabled parking space. An internal lift would be

provided and would be accessible to all floor providing level access to all the proposed unit. It is considered that the proposal would provide an inclusive living environment for the future occupiers.

Private outdoor space

6.2.18 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.

6.2.19 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"

6.2.10 The proposed residential units would all be provided with a private balcony or terrace. The proposed balcony is designed to comply with the minimum balcony/terrace requirements. The sizes would be as follows:

	Policy requirement	Proposed balcony
1bed/2 person	5sq.m	5 to 7sq.m
2bed/3 person	6sq.m	6sq.m
2bed/4 person	7sq.m	7sq.m

Child play

6.2.11 London Plan Policy S4 states that development proposals that are likely to be used by children and young people should:

- a. increase opportunities for play and informal recreation and enable children and young people to be independently mobile;
- b. for residential development, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child.

6.2.12 The London Mayor's Shape Neighbourhoods: Play and Informal Recreation SPG (2012) suggests that there should be a clear requirement for all new residential developments generating more than 10 children to provide suitable play space as part of a new development. Developments with an estimated child occupancy of less than 10 children should be required to make an appropriate financial contribution to off-site play provision in line with the Play and Inform recreation SPG.

6.2.13 The estimated child yield of this proposal would be 2.6 child and a minimum of 26sq.m of child play area should be provided. The proposed

site layout plan indicates that an on-site child play area approximately 80sq.m would be provided. Subject to a planning condition securing the details of play equipment focusing on ages between 0 to 4 years old and 5 to 11 years old including its maintenance of the facilities, it is considered that the proposal would provide a good quality living environment and play space for the future occupiers.

Dual Aspect

6.2.14 Natural light is vital to a sense of wellbeing in the home and this may be restricted in densely developed parts of the city. Dual aspect development should be encouraged and single aspect north facing units should be minimised in line with Standard 29 of the London Housing SPD.

6.2.15 The proposed floor plan indicates that 65 percent of the proposed units (11 out of 17 units) are designed to achieve dual aspect. It is considered that the layout of the proposal would provide a good quality living environment for the future occupiers.

Secured by Design

6.2.16 London Plan Policy D3 states measures to design out crime should be integral to development proposals and be considered early in the design process. Development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety without being overbearing or intimidating. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places. This approach is supported by BLP Policy 37 (General Design).

6.2.17 The proposed layout indicates the private, communal and public spaces are well defined. 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.

Fire Safety

6.2.18 London Plan Policy D12 states in the interest of fire safety and to ensure the safety of all building users. All development proposals must achieve the highest standard of fire safety and a fire statement detailing how the development proposal will function. The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety

before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole.. A fire statement is submitted which indicates the means of escape route, control of fire spread, fire services access including water supplies for firefighting purposes are provided and is considered acceptable. The fire brigade were consulted and did not comment. Compliance to the fire statement will be conditioned however, compliance with the Building Regulations will still be required at the appropriate stage of the development.

6.3 Design and Layout – Acceptable

- 6.3.1 London Plan Policy D3.D.1 states development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types forms and proportions. BLP Policy 37 states all development proposals will be expected to be of a high standard of design and layout. Criteria (a) to (b) states that developments will be expected to be imaginative and attractive to look at, of good architecture quality and should complement the scale, proportion, form layout and materials of adjacent buildings and the area; positively contribute to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks or landscape features.
- 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 homes, 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 and the approved development for Phase 1 and Phase 2 are also relevant in considering this proposal.
- 6.3.4 The proposal is designed to echo the approved development for Phase 1 and Phase 2 and 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 the 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 positioned 1 metre from the pavement. The siting of the buildings failed to take into account the sense of openness and spaciousness of the site. The approved buildings associated to Phase 1 and 2 development range between 5.5 metres to 8 metres.
- 6.3.7 The front building line of the proposed building would be sited approximately 4.8 and 5.6 metres from the road. It is noted that the distance towards the road would be less than the approved development. It should be noted that the building line would be staggered and a good spatial distance would be maintained. The area between the front of the proposed building and the pavement would also provide adequate opportunities to introduce adequate replacement planting providing a good visual value when view from the road. It is considered the siting of the proposed building has taken into account the existing characteristics of the site and a good degree of spaciousness between the front of the proposed buildings and pavement on Homefield Rise can be maintained.

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 building height of the approved development in Phase 1 and 2 is part 4 and part 3 storey. The approved development is designed to reflect the topography of the land. The application site is located on a slope and situated between Phase 1 and Phase 2. The height of the proposed building would drop down from four to three storeys which echoes the topography of the land and the approved development in Phase 1 and Phase 2. It is noted that the existing building at 32 Homefield Rise would be retained, and the current application does not include No. 30 Homefield Rise. However, it should be noted that the proposal is designed to ensure the proposal would not compromise the future development of the remaining Site 11 when the remaining site is ready

to come forward. As such, it is considered the proposed roofscape would be acceptable.

Scale and massing

6.3.10 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.

6.3.11 The height of the proposed building would measure between 9.5 and 12.6 metres in height. The maximum depth and width of the proposed building would both measure approximately 21 metres. 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. The rear elevation of the proposed building would be positioned approximately 22 metres from its rear boundary towards the back garden of houses on Lancing Road, of a comparing distance when compared with the approved Phase 1 and Phase 2 development (range between 15 metres and 23.5 metres).

6.3.12 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 designed to address the issue raised in the previous appeal and would be compatible with the approved development in Phase 1 and Phase 2. It is considered that the proposed medium rise buildings would sit well in between high-rise development in the town centre and lower rise development with domestic houses to the south of the site and this would create a good transition between the town centre and the domestic houses in the area.

6.3.13 With regard to the external appearance of the proposed building, the elevational treatments are designed to echo the approved building in phase 1 and 2. The arrangement of windows and balconies would provide a sense of rhythm, scale and proportion of the buildings and adequately reflect the approved scheme, which is under construction. It is considered that the scale and massing of the proposal would not be inappropriate 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 its policy requirements.

6.4 Impact on Neighbouring Amenities

Loss of sunlight and daylight

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 house at no. 30 Homefield Rise and houses to the rear on Lancing Road. The distance between the proposal and the neighbouring properties are as follow:

- The distance between the proposed building and Sapphire House opposite to the site measures approximately over 33 metres;
- Side of the proposed building would be located approximately 15 metres to the side boundary of No.30 Homefield Rise.
- The back to back distance between the proposed building to the rear of the houses on Lancing Road measures between 40 metres to 44 metres.

6.4.2 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

6.4.3 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 Number’s 10, 12, 16 and 48 Homefield Rise.’

6.4.4 The proposed building would be sited between Phase 1 and Phase 2 and adjoining to Number 30 Homefield Rise. The proposed building would not impinge on the 45 degree line from the rear of the neighbouring rear windows, including Number 32 Homefield Rise which forms part of the application site to be retained. It should be noted that the secondary habitable room windows would be installed with obscured glazed windows.

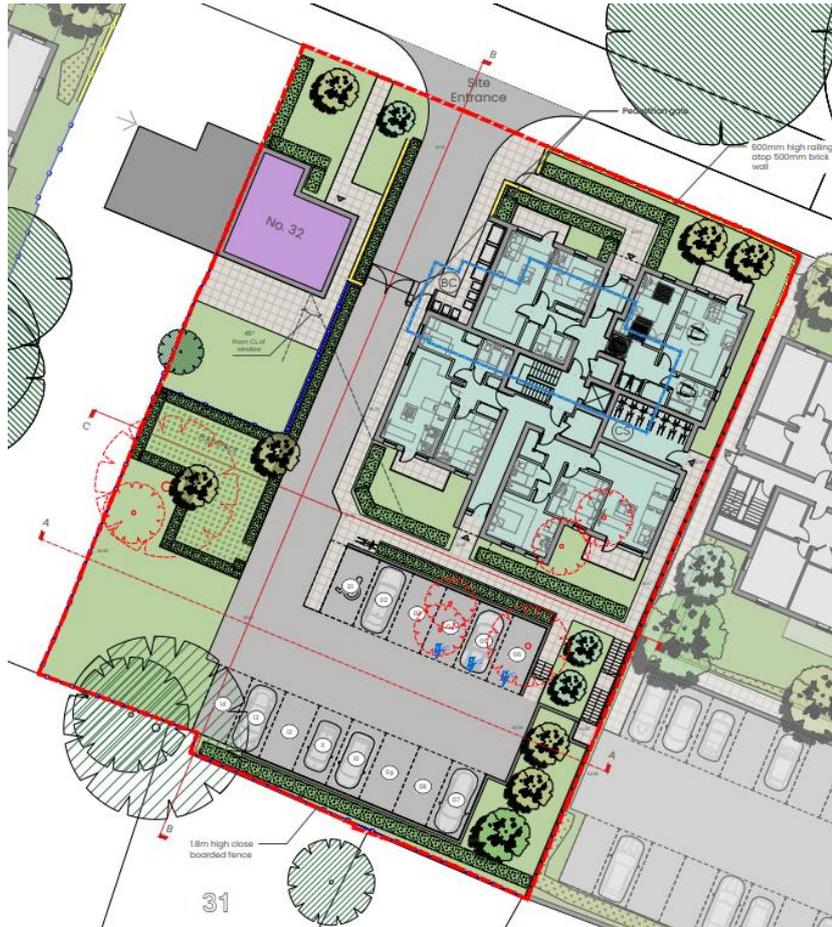


Fig 2. Proposed site layout and 45 degree line (NEED CHANGE)

- 6.4.5 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. 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.
- 6.4.6 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.
- 6.4.7 In the event that the remainder of the site remains undeveloped, the proposed floor plans indicate that the proposals would not have an adverse impact on the neighbouring residential amenities of the existing dwellings. A good distance between the proposed development would be maintained and adequate size of garden would be retained for the existing dwelling at Number 32 Homefield Rise. It is considered that the

proposal would not have an adverse impact on neighbours' residential amenities.

6.5 Transport and Highways

Access

- 6.5.1 BLP Policy 32 states the Council will consider the potential impact of any development on road safety and will ensure that it is not significantly adversely affected.
- 6.5.2 A communal vehicular access would be created leading to the proposed car park located to the rear of the building. A Stage 1 Road Safety Audit and Transport Statement are submitted and have been reviewed by the Council Highway division. A swept path analysis confirming vehicles can enter and leave the site in a forward gear was provided. Subject to a Stage 2 and Stage 3 Road Safety Audit, the proposed access is considered acceptable and would not have an adverse impact on highway safety. The cost to remove the existing vehicular accesses to the houses should be removed at the cost of the development. These details will be secured by a planning condition.

Parking provision

- 6.5.3 London Plan Policy T1 states that 80 percent of all trips in London should be made by foot, cycle or public transport by 2041. The London Plan seeks to encourage more sustainable travel, enabling car-free lifestyles that allow an efficient use of land and improve well-being by encourage cycling and walking. London Plan Policy T6.1 and Table 10.3 of the London Plan sets the maximum parking standard for new residential development.
- 6.5.4 The maximum London Plan parking standard is 1 spaces (between 0.5 to 0.75 spaces per new dwelling). A total of 14 parking spaces including a disabled parking space and 2 parking spaces for 32 Homefield Rise would be provided. This provision will meet the London Plan standard. A car club management plan confirming its management would be secured by a planning condition.
- 6.5.5 London Plan sets the standards for electric charging facilities for residential development, a minimum of 20 percent (3 spaces) parking spaces should have active charging with passive provision for all remaining spaces (11 spaces). This standard is indicated in the transport statement and will be secured by a planning condition.

Cycle

- 6.5.6 London Plan Policy T5 set the standard for cycle parking. A minimum of 21 long stay spaces (1 space per 1 bed and 1.5 spaces per 2 bed unit).

A minimum of 2 short stay spaces should be provided for development provided 5 to 40 dwellings.

- 6.5.7 The planning application form indicates that 24 cycle storage spaces will be provided. Whilst a cycle storage area is indicated on the proposed layout plan, the storage area within the building does not appear to be accommodate the required spaces. Having reviewed the proposed layout of the site, the required provision can be accommodated to the rear of the building. A condition requiring this provision will be secured by a planning condition.

Waste services

- 6.5.8 BLP Policy 113 states major development proposal will be required to implement site waste management plans to reduce waste on site and manage remaining waste sustainability. New development will be required to include adequate space to support recycling and efficient waste collection.

- 6.5.9 Dedicated, secured, adequate location and size of waste storage area should be provided for new residential development. A dedicated waste storage area accommodating 3 x 1,100 litre non-recycle waste, 3 x 240 litre for bottle and 3 x 240 for paper would be provided. The proposed storage area would be located next to the vehicular entrance gate. The Council's waste services have raised no objection to its location and size of storage area, subject to a condition requiring this provision be provided prior to first occupation and confirming the storage area would be secured and not abused by non-residents.

6.6 Trees and Biodiversity

- 6.6.1 BLP Policy 72 states planning permission will not be granted for development that will have an adverse effect on protected species, unless mitigation measures can be secured to facilitate survival, reduce disturbance, or provide alternative habitats.

- 6.6.2 A tree survey including a tree constraint and protection plan is submitted which indicates 7 category C tree (T8 – Apple, T10 – Pear, T13 – Twisted Willow, T21 - Holly, T22 - Cherry and T23 - Hawthorn) and 2 category C hedges (G7- Privet and G20 - Privet) would be removed from the site.

- 6.6.3 The submitted tree survey indicates that 2 category B trees (T19 Birch and T25 Maple, 1 category U trees (T25 – Maple) and 1 category C hedge are located in the neighbouring gardens and near to the rear boundary. Any removal or treatment of this planting would be subject to agreement with the relevant owners. Root protection plans are provided to ensure the longevity of these trees during construction works.

- 6.6.4 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 a 10 percent biodiversity net gain can be achieved and value of the sites can be maintained. Subject to the details of the landscaping plan, it is considered that the proposal would be acceptable.

6.6.5 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.

6.6.6 A preliminary ecological appraisal (June 2021) 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, scrub and ruderal habitats, buildings and hardstanding. There are areas of taller grassland and scrub identified within the site along with a number of scattered trees.

Bats

6.6.7. The records from Greenspace in Greater London highlight the presence of common and soprano pipistrelles in a 1km radius within the last 10 years, both of which are commoner species, particularly in more developed areas. Although it is possible that additional species are present using site, no known roosts of more significant species such as Bechsteins, barbastelle or horseshoe bats exist in the local area. It is considered unlikely that large numbers of bats are using the site, with habitat of limited suitability for bats largely consigned to the margins of the site in the rear gardens and around scattered trees.

6.6.8 The previous surveys indicate that the site did not identified any of the buildings with supporting evidence of roosting bats, both internally or externally. The activity and emergency survey undertaken in 2020 did not records any bats utilising the site. The most recent external survey also found there to be negligible potential for roosting bats no further surveys of these buildings is therefore recommended.

Badgers

6.6.9 There are no confirmed evidence of badgers, such as setts, latrines or snuffle holes, was identified at the time of the survey. A number of holes was identified in the rear garden of several of the houses, and a number of the rear gardens could not be fully accessed due to dense scrub and fly tipping. It is recommended that dense pockets of scrub are sensitively cleared to assess whether there are more holes present. The works should be undertaken by a suitably qualified ecologist.

Reptiles

6.6.10 The majority of the habitats on site were considered sub-optimal for foraging reptiles. Hardstanding, amenity grassland and buildings do not support significant numbers of invertebrates and provide little in the way of cover. The areas of tall ruderal grassland, and compost heap identified in the garden of house number 36, could provide some foraging habitat for reptiles, especially slow worms. Given the small size of these suitable areas and their isolation from each other and other suitable habitats it is considered unlikely reptiles are present. It is recommended that a sensitive working practice for the removal of the vegetation is undertaken in the unlikely event of a reptile being found.

6.6.11 The site is not considered to be constrained by dormice, great crested newts, stage beetles or any other protected species such as otters. It is considered that no further survey work for these species is required.

6.6.12 The following enhancement works are proposed:

- Nesting birds may use the trees and scrub on site. It is recommended that clearance work on site be undertaken outside of the breeding bird season (March-September inclusive) or immediately after a nesting bird check by a suitably qualified ecologist.
- Native species such as beech (*Fagus sylvatica*), hornbeam (*Carpinus betulus*), rowan (*Sorbus aucuparia*), field maple (*Acer campestre*), London plane (*Platanus x Hispanica*), broad leaved privet (*Ligustrum lucidum*) and alder (*Alnus* species.)
- Nest boxes and bricks should be installed in order to provide new nesting opportunities for birds
- The use of raised beds and planters could be incorporated into the design of the scheme where green space on site is limited.

6.6.13 Should the application be considered acceptable overall, tree and ecology conditions, to include the requirement for new and additional planting along the site boundary and the provision of ecological enhancements such as bat and bird boxes, would be recommended. Overall, it is considered that the impact of the proposal on biodiversity would be acceptable.

6.7 Energy and Sustainability

6.7.1 BLP Policy 72 states planning permission will not be granted for development that will have an adverse effect on protected species, unless mitigation measures can be secured to facilitate survival, reduce disturbance, or provide alternative habitats.

6.7.2 BLP Policy 124 and London Plan Policy SI 2 requires major development should be net zero- carbon, reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy.

- 1) Be Lean: use less energy and manage demand during operation;
- 2) Be Clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;
- 3) Be Green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site;
- 4) Be Seen: monitor, verify and report on energy performance.

6.7.3 London Plan requires a net zero-carbon target for all new major developments with at least a 35% on-site reduction beyond Part L 2013 of the Building Regulations. Under the Be Lean measures, residential development should achieve 10 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site, any short fall should be provided in agreement with the borough, either:

- 1) Though a cash in lieu contribution to the borough's carbon offset fund or
- 2) Off-site provided that an alternative proposal is identified and delivery is certain.

6.7.4 An updated Energy Assessment following the GLA's energy hierarchy has been received and have been reviewed by the Council's Energy officer. Under the "Be Lean" category, a range of passive design features would be employed to reduce the heat loss and demand for energy. The measures include building fabric performance and insulation, glazing design and specification, wall and pipework insulation, are proposed to reduce the carbon emission of the proposed development. A minimum 10 percent reduction is required for domestic development requirement as outlined in the GLA energy guidance and this is considered acceptable.

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

6.7.6 Under "Be Green" category, a range of on-site renewable energy technologies. It is considered that the use of air source heat pumps, and solar photovoltaic (PV) would be the most feasible options for this site.

6.8.8 The source heat pumps would operate by extracting heat energy from the surrounding air and transferring that for space and water heating. The solar panel capacity would be 13kW peak.

6.8.9 The updated energy assessment indicates that the total regulated carbon saving on the site would achieve 85.8 percent (15.1 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 14.2 percent carbon saving, equivalent to 2.5

tonne (£7,125) would be secured by a S106 legal agreement. The breakdown is as follow:

- On site regulated carbon dioxide emissions (Building Regs 2013 Compliant Development) = 17.6 tCO₂ per annum
- Proposed on site reduction of carbon emissions from energy demand/ASHP/Solar PV renewables = 15.1 tCO₂ per annum
- On site shortfall = 2.5 tCO₂ per annum
- Payment-in-lieu amount calculated as 2.5 (tCO₂) x £95 (per tCO₂) x 30 (years) = £7,125

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 - Air Quality

6.8.1 The NPPF at para 170 states decisions should among other things prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Development should, wherever possible, help to improve local environmental conditions such as air quality. Proposals should be designed and built to improve local air quality and reduce the extent to which the public are exposed to poor air quality.

6.8.2 BLP Policy 120 states developments which are likely to have an impact on air quality or which are located in an area which will expose future occupiers to pollutant concentrations above air quality objective levels will be required to submit an Air Quality Assessment. Developments should aim to meet "air quality neutral" benchmarks in the GLA's Air Quality Neutral report. London Plan Policy SI-1 also echo this requirement.

6.8.3 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 Air Quality assessment is submitted which 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 have considered and no objection has been raised, planning condition requiring the following should be secured by a planning conditions:

- Any gas boiler must meet a dry NO_x emission rate of <40mg/kWh.
- Electric charging point should also be secured by condition,. 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.

- 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).
- Construction management plan.

6.8.4 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

6.8.5 London Plan Policy D13 agent of change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise sensitive development. Development should be designed to ensure the established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

6.8.6 A noise impact assessment including a noise survey was carried out which indicates the accommodation would be suitable for the proposed use. The noise survey was carried out on a 24 hour basis for 4 days during the weekend. The Council's Environmental Health Division have reviewed the detail provided and considered that an acoustic assessment is acceptable at application stage. A noise assessment to include noise survey during the night time weekend hours should be submitted to confirm the adequacy of mitigations measures, as necessary in light of the results of assessment, (covering façade, glazing and ventilation specifications to achieve suitable internal noise levels in line with guidance in BS8233:2014). Subject to the planning condition, it is considered that the proposal would be acceptable.

6.8.7 In term of impact upon the neighbouring properties, the proposed use is considered to be compatible with its surrounding. It is noted that a child play area and a car park would be provided. The access to these areas would be gated and would only be provided for the residents living within the site. As such, it is considered that the proposal would not have an adverse impact on noise and disturbance. The details of external lighting in the car park would be secured by a planning condition.

6.9 Drainage

Surface water drainage

6.9.1 The NPPF states that major development should incorporate sustainable drainage systems which should take into 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. London Plan Policy SI-13 and BLP Policy 116 states development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

6.9.2 The application site is located within Flood Zone 1 where the probability of river or sea flooding is less than 0.1% (1 in 1000) chance in any given year as defined by the Environment Agency. A flood risk assessment is submitted which indicates the site is not subject to surface water flooding. The surrounding highway network outside the site is subject to low to high risk of surface water flooding.

6.9.3 The submitted flood risk assessment indicates that the impermeable area would be increased from approximate 986sq.m to approximately 1,050sq.m. The proposal would follow the drainage hierarchy. Infiltration is the preferred option to deal with the water at source. As there are no watercourses within close proximity to the site and there is no opportunity to discharge surface water to an existing water course. The proposed drainage strategy would employ the following measures:

- Water butts (from 100 litres to up to 2, 000 litre);
- Permeable surface for the car park and access road; and,
- A 140 cubic metres geo - cellular storage crate.

6.9.4 The Council's drainage officer have reviewed the submitted flood risk assessment and considered that details are acceptable at application stage. The design detail and measures to be implemented and in line with the submitted Flood Risk Assessment (issue 2 revision 4 dated 11/06/2021) shall be submitted to and approved by the Local Planning Authority before development commence on site. No objection is raised by Thames Water and have requested a piling method statement be submitted and provided in consultation with Thames Water prior to commencement of the development. A number of informatives are also requested which outlined in the consultation response section of this report. Subject to the conditions and informative, it is considered that the proposal would be acceptable.

7 Planning Obligations and CIL

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.

7.2 The Council's local CIL is adopted on the 15th June 2021 and the development is subject to local CIL.

Head of Terms

7.3 The following planning obligations will need to be secured as part of a legal agreement under s106 of the Town and Country Planning Act

- Carbon offset £7,125;
- Affordable housing provision;
- Review mechanism- early stage;
- Monitoring fee: £500 per head of terms; and,
- Legal fee TBC.

7.4 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 including affordable housing to meet the need of the Borough at a sustainable location. The proposal would positively contribute to the Council's five year housing land supply.

8.2 The proposal would cover number 32, 34 and 36 Homefield Rise and does not cover number 30 Homefield Rise. The applicants have continued negotiations with the freeholder associated to the remainder of Site 11. The applicants remain open for negotiations and discussion to bring the remainder site forward.

8.3 The proposal is designed to address the shortcomings of the 2016 scheme and the approved development in Phase 1 and Phase 2. 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. The proposed would provide adequate internal and external living spaces and would provide adequate parking spaces to accommodate the need for the future occupiers.

8.5 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.

8.6 Furthermore, the development is considered acceptable from a sustainability, air quality and environmental health perspective.

- 8.7 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 and documents

Pre-Commencement Conditions:

3. Construction and Environmental Management Plan
4. Piling method statement in consultation with Thames Water
5. Design details associated to flood risk assessment
6. Noise impact assessment
7. Arboricultural method statement and Tree Protection Plan including the rear boundary treatment
8. Land contamination

Above ground

9. Stage 2 Road Safety Audit (moved from pre-commencement as requested by applicant)
10. Secure by Design
11. Details of external materials
12. Electric charging points (active and passive)
13. Privacy screening
14. Landscaping
15. Bicycle parking
16. Child play provision and equipment
17. Ecology supervision, enhancement and biodiversity net gain including bird box and swift bricks.

Prior to occupation conditions

18. Car park management plan
19. Stopping-up of existing access
20. Stage 3 Road Safety Audit
21. Refuse storage provision confirming its enclosure
22. Energy Statement verification (moved from above ground)

Compliance

23. Hardstanding for wash-down facilities for construction vehicles

24. All Non-Road Mobile machinery to comply with relevant emissions standards
25. Wheelchair units
26. Parking spaces
27. Air quality
28. Fire strategy

Informatives

- Mayoral and Local CIL
- Secured by Design
- Environmental Health
- Vehicle crossover application
- Thames Water (various)
- Site 11 policy requirement