

Committee Date	20.01.2022	
Address	Bouverie Lodge 4 Rectory Road Beckenham BR3 1TU	
Application Number	21/01149/FULL1	Officer - Russell Penn
Ward	Clock House	
Proposal	Demolition of existing 4th floor, erection of two storey upward extension to create new 4th and 5th floors to provide 8 flats (4 x 1 bed, 2 x 2 bed, 2 x 3 bed) alongside associated works to communal core, new car parking arrangement, cycle and refuse store, new plant room and upgrades to landscaping, hardstanding and boundary treatment.	
Applicant	Agent	
Mr John Buckingham	Mr John Buckingham	
Bouverie Lodge Penthouse 4 Rectory Road Beckenham BR3 1TU	86-90 Paul Street Hackney London EC2A 4NE	
Reason for referral to committee	Call-In	Councillor call in Yes

RECOMMENDATION	Permission
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<p>KEY DESIGNATIONS</p> <p>Biggin Hill Safeguarding Area Biggin Hill Safeguarding Area London City Airport Safeguarding London City Airport Safeguarding Open Space Deficiency Smoke Control SCA 12</p>

Land use Details		
	Use Class or Use description	Floor space (GIA SQM)
Existing	Residential (Use Class	1865

	C3)	
Proposed	Residential (Use Class C3)	2048

Residential Use					
	Number of bedrooms per unit				
	1	2	3	4 Plus	Total / Payment in lieu
Market	4	4			8
Affordable (shared ownership)					0
Affordable (social rent)					0
Total					8

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	46	49	3
Disabled car spaces	0	2	2
Cycle	0	tbc	tbc

Electric car charging points	tbc by condition
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Representation summary	Neighbour letters were sent on 29/04/2021 and 09/11/2021.	
Total number of responses	45	
General comment	3	
Number in support	1	
Number of objections	41	

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site optimisation and unit type of the proposed scheme is acceptable, and the development would not be detrimental to the character and appearance of the area and locality.
- The proposed development would have a high quality design and would not have an unacceptable impact on the amenity of neighbouring occupiers.
- The standard of the accommodation that will be created will be good.
- The proposal would not have an adverse impact on the local road network or local parking conditions.
- The proposal would be constructed in a sustainable manner and would achieve good levels of energy efficiency.

2 LOCATION

- 2.1 The site is a corner plot measuring approximately 3022m² bounded by Rectory Road to the east and Blakeney Road to the north. This site is known as “Bouverie Lodge”, a modern 5 storey residential block comprising of 32 apartments, including two penthouse flats set back from the main building. The site features associated garages which are accessed from Blakeney Road and also benefits from further off-street parking which is accessed from Rectory Road.
- 2.2 The immediate surrounding area is pre-dominantly residential and characterised by a mixture of houses and flatted developments ranging from 2-4 storeys with the tallest blocks (4 storeys) situated to the east along Rectory Road and Hayne Road to the west of the site, also immediately to the north are 3 storey blocks facing onto Blakeney Road.
- 2.3 The site is within an area with a PTAL rating of 4 on a scale between 0 to 6b, where 0 is worst and 6b is excellent. The site is also designated as an ‘Area of open space deficiency’ and within an area with ‘Views of local importance’. The site is not located in a conservation area nor is the building listed.



Location Plan



Existing Streetscene View

3 PROPOSAL

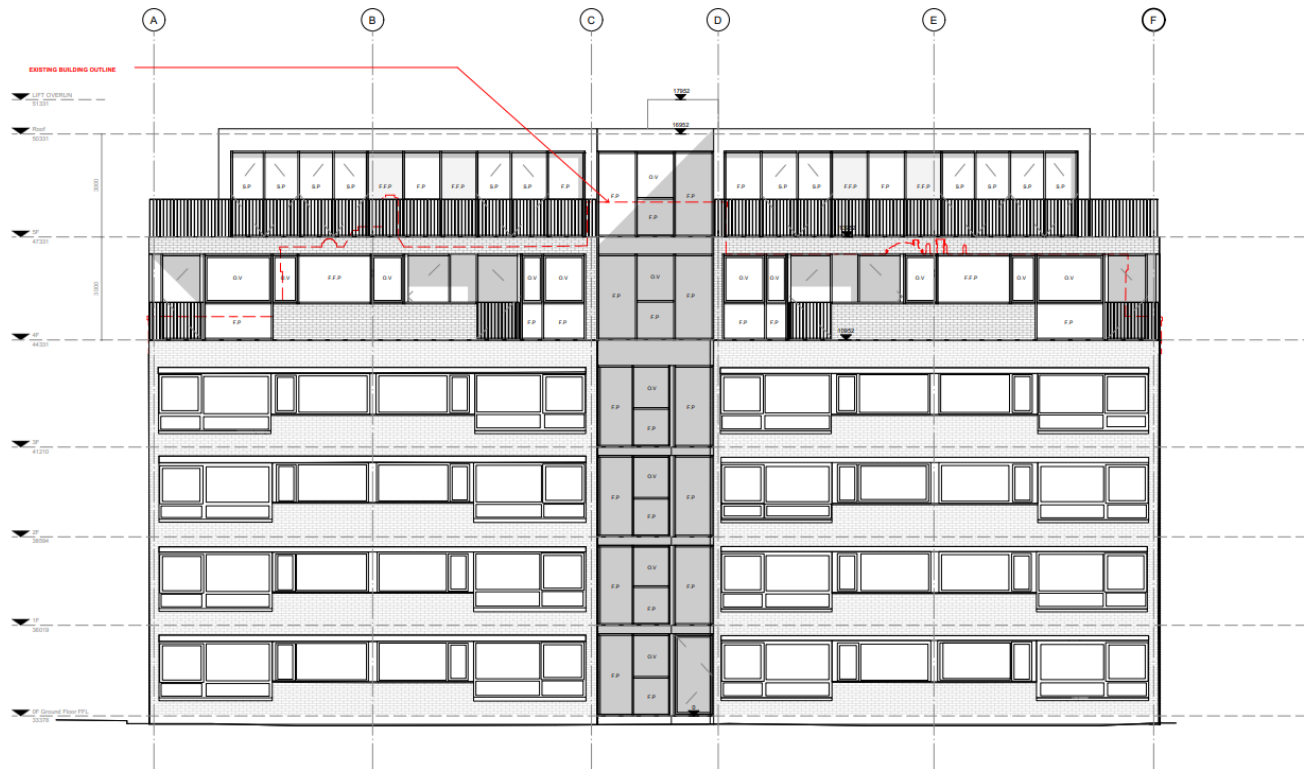
- 3.1 Planning permission is sought for the demolition of the existing 4th floor and the erection of a two storey upward extension to create new 4th and 5th floors to provide 8 flats (4 x 1 bed, 2 x 2 bed, 2 x 3 bed) alongside associated works to communal core, new car parking arrangement, cycle and refuse store, new plant room and upgrades to landscaping, hardstanding and boundary treatment.
- 3.2 This comprises a replacement fourth floor (fifth storey) to be constructed on the footprint of the existing third floor (fourth storey) roof with a fifth floor (sixth storey) above, that is set back approximately 2m from all elevations. The overhaul height of the upward extension construction is 6m which incorporates the mass of the existing fourth floor element to be removed. A proposed external plant room is located to the mid-section of the southern boundary closest to the car parking area.
- 3.3 In terms of materiality at fourth floor, a brick slip cladding that colour and texture matches the existing building, is proposed. Windows at this level are proposed to be white powder coated aluminium to respect the existing fenestration below. The set back fifth floor elevations are indicated to have metal cladding with external terrace areas being surrounded in vertical flat bar balustrades.
- 3.4 The existing floors of the building will be overhauled. The retained brickwork façade is proposed to be cleaned and re-pointed with a white tone mortar harmonising the with the new 4th floor addition. Existing timber windows and painted lintels are to be refinished where necessary along with removal of redundant wiring and similar to uplift the host building.
- 3.5 The application was supported by the following documents:
 - Design and Access Statement
 - Daylight and Sunlight - Impact on neighbouring properties report.



Proposed Scheme – West View



Proposed Scheme – East View



Red line denotes existing fourth floor outline.

4 RELEVANT PLANNING HISTORY

- 4.1 The relevant planning history relating to the application site is summarised as follows:
- 4.2 18/02395/FULL1- Attached garages x 2 adjacent to existing. Permitted 26.06.2018

5 CONSULTATION SUMMARY

A) Statutory

Environmental Health Pollution Officer: – No objection

- No objections raised subject to further details to be obtained by planning condition in respect of: construction management; external noise protection; internal noise transmission relating to lift core; background noise levels in relation to the external plant room; and for air quality in relation to Low NOx boilers and provision of Electric Vehicle Charging Points.

Drainage Officer – No objection

- No comments

Highways Officer – No objection

- According to Transport for London's (TfL) Planning Information Database the site has a PTAL rating of 4 which is classified as 'good' (on a scale of 0 – 6b, where 6 is the most accessible). The application is for demolition of existing fourth floor penthouse dwelling and erection of proposed new fourth floor comprising of 4 x 1 bedroom, 2 x 2 bedrooms apartments, plus extended fifth floor penthouse level comprising of 2 x 3 bedrooms penthouse apartments. The applicant is providing 5 no. new car parking bays (including 2 no. new garages and 2 no. new DDA parking bays).

B) Local Groups

No comments.

C) Adjoining Occupiers

Character and design (addressed in para 7.2)

- Additional floors are out of keeping with surrounding blocks of flats.
- Concerns with extra height against skyline in connection with elevated position of the building.
- Concerns with precedent for similar proposals to surrounding development.
- Comments the building would become tallest in the locality.
- Concerns regarding plans for and maintenance of external areas.
- Comments that the extension materials will not blend in.
- No need for more blocks of flats. Already surplus in the area. More houses are needed.
- Concerns with design style proposed.
- Plant rooms overbearing to existing ground floor flats
- The proposal due bulk, density, mass, scale, materials and architectural quality has a detrimental effect on its surroundings, neighbouring properties and townscape.

Standard of accommodation (addressed in para 7.3)

- Concerns with impacts to existing building stairwells and lobby areas.
- Comments regarding fire safety standards being met.
- Comments that no meaningful proposals to improve the condition of the current block for the existing residents
- Concerns with Part M compliance.

Neighbouring amenity (addressed in para 7.5)

- Concerns that extra height and additional windows will cause greater overlooking to blocks of flats and other dwellings surrounding the site and reduce privacy.
- Additional height will impact on light and sunlight to surrounding homes.
- Amended plans have not addressed height and privacy issues.

Highways and parking (addressed in para 7.4)

- Concerns with environmental pollution due to additional cars from the development.

- Concerns with increased parking congestion due to the development.
- Comments that additional parking is not enough for existing and future extra residents.
- Servicing/deliveries of the block need further consideration.

Noise and disturbance (addressed in para 7.5)

- Concerns with extra noise and disturbance from extra residents in the resulting building.

Other comments (addressed in section 7 and by planning condition)

- Concerns with initial level of notification carried out and with consultation from the developer to existing residents.
- Concerns regarding the impact of the construction process in terms of noise, pollution and length of the period of construction.
- Unclear of the benefit of this type of housing.
- Proposal does not benefit the existing blocks residents.
- Concerns with structural integrity of the existing building.
- Concerns with the current maintenance standards of the building.
- Provision for electric vehicles need to be made.
- Concerns the applications supporting information is not adequate.
- Comments that any potential protected species on site are protected.
- Alternative accommodation should be provided during works.

6 POLICIES AND GUIDANCE

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

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

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

6.3 The development plan for Bromley comprises the London Plan (March 2021) and the Bromley Local Plan (2019). The NPPF does not change the legal status of the development plan.

6.4 The application falls to be determined in accordance with the following policies:-

6.5 **National Policy Framework 2021**

6.6 **London Plan 2021**

D1	London's form and characteristics
D3	Optimising site capacity through the design-led approach
D4	Delivering good design
D5	Inclusive design
D6	Housing quality and standards
D7	Accessible housing
D9	Tall Buildings
D11	Safety, security and resilience to emergency
D12	Fire safety
D13	Agent of change
D14	Noise
H1	Increasing Housing Supply
H2	Small sites
H5	Threshold Approach to application
H10	Housing Size Mix
S4	Play and informal recreation
G5	Urban greening
G6	Biodiversity and access to nature
G7	Trees and woodlands
SI1	Improving air quality
SI4	Managing heat risk
SI5	Water infrastructure
SI7	Reducing waste and supporting the circular economy
SI12	Flood risk management
SI13	Sustainable drainage
T2	Healthy Streets
T3	Transport capacity, connectivity and safeguarding
T4	Assessing and mitigating transport impacts
T5	Cycling
T6	Car parking
T6.1	Residential Parking

6.7 Bromley Local Plan 2019

1	Housing Supply
4	Housing Design
8	Side Space
30	Parking
32	Road Safety
33	Access for All
34	Highway Infrastructure Provision
37	General design of development
47	Tall & Large Buildings
73	Development and Trees
74	Conservation and Management of Trees and Woodlands
77	Landscape Quality and Character
112	Planning for Sustainable Waste management
113	Waste Management in New Development
115	Reducing flood risk
116	Sustainable Urban Drainage Systems (SUDS)

- 117 Water and Wastewater Infrastructure Capacity
- 118 Contaminated Land
- 119 Noise Pollution
- 120 Air Quality
- 122 Light Pollution
- 123 Sustainable Design and Construction
- 124 Carbon dioxide reduction, Decentralise Energy networks and Renewable Energy

6.8 Bromley Supplementary Guidance

SPG1 – General Design Principles

SPG2 – Residential Design Guidance

Housing: Supplementary Planning Guidance. (March 2016)

Technical housing standards - Nationally Described Space Standard (March 2015)

National Design Guide – (September 2019)

7 ASSESSMENT

7.1 Principle of Development - Acceptable

- Housing Supply

7.1.1 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.

7.1.2 The NPPF (2021) 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.

7.1.3 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.

7.1.4 London Plan Policy H1 sets Bromley's housing target at 774 homes per annum. In order to deliver this target, boroughs are encouraged to optimise the potential for housing delivery on all suitable and available brownfield sites. This approach is consistent with Policy 1 of the Bromley Local Plan, particularly with regard to the types of locations where new housing delivery should be focused.

7.1.5 Policy H2 requires Boroughs to pro-actively support well-designed new homes on small sites (below 0.25 hectares in size). Policy D3 requires all development to make the best use of land by following a design led approach.

7.1.6 This application includes the provision of eight additional residential dwellings and would represent a minor contribution to the supply of housing within the Borough. This will be considered in the overall planning balance set out in the conclusion of this report, having regard to the presumption in favour of sustainable development.

- Optimising Sites:

7.1.7 Policy H1 Increasing Housing Supply of the London Plan states that to ensure housing targets are achieved boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions. Policy 1 of the Local Plan and Policy H1 of the London Plan set the context in the use of sustainable brownfield sites for new housing delivery.

7.1.8 Policy H2 Small Sites of the London Plan states that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to significantly increase the contribution of small sites to meeting London's housing needs.

7.1.9 The London Plan does not include a prescriptive density matrix and promotes a design-led approach in Policy D3 to optimise the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. Policies D2 and D4 are also relevant to any assessment of development proposals, including whether the necessary infrastructure is in place to accommodate development at the density proposed.

7.1.10 Local Plan Policies 4 and 37 accord with paragraph 130 of the National Planning Policy Framework, which requires development to be sympathetic to local character whilst optimising the potential of sites.

7.1.11 The site is located within a wider primarily residential area with varying forms of housing typology surrounding the wider locality of the site as detailed above. The provision of additional housing will contribute to the need to meet housing targets set out in the London Plan and Policy 1 of the Bromley Local Plan. Therefore, in this location, the Council will consider additional development to the existing building provided that it is designed to complement the character of surrounding developments, the design and layout make suitable residential accommodation, and it provides for garden and/or amenity space. Any adverse impact on neighbouring amenity, conservation and historic issues, biodiversity or open space will need to be addressed.

- Housing unit mix

7.1.12 Policy H10 Housing size mix of the London Plan states that schemes should generally consist of a range of unit sizes and regard should be had to local evidence of need.

7.1.13 Local Plan Policy 1 Supporting Text (paras 2.1.17 and 2.1.18) highlight findings from the 2014 Strategic Housing Market Assessment (SHMA) that the highest level of need across tenures within the Borough up to 2031 is for one bedroom units (53%) followed by 2 bedroom (21%) and 3 bedroom (20%) units. Larger development proposals (i.e. of 5+ units) should provide for a mix of unit sizes and be considered on a case by case basis.

7.1.14 The application proposes an additional 4 one bedroom, 2 two bedroom and 2 three bedroom residential units which is considered an acceptable mix at this location.

7.2 Design – Acceptable

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

7.2.2 Paragraph 126 of the NPPF (2021) states that beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

7.2.3 Paragraph 130 of the NPPF (2021) requires Local Planning Authorities to ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). New development shall also establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development

(including green and other public space) and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- 7.2.4 London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.
- 7.2.5 Policy D3 of the London Plan relates to 'Optimising site capacity through the design-led approach' and states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Form and layout should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape. The quality and character shall respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.
- 7.2.6 Policy D4 of the London Plan outlines the various methods of scrutiny that assessments of design should be based on depending on the level/amount of the development proposed for a site.
- 7.2.7 Policy D5 of the London Plan relates to 'Inclusive Design' and states that development proposal should achieve the highest standards of accessible and inclusive design.
- 7.2.8 Policy D9 of the London Plan relates to 'Tall Buildings' and states that development proposals should address visual impacts; functional impacts; environmental impacts and cumulative impacts of tall buildings
- 7.2.9 Policy H2 of the London Plan states that Boroughs should also recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites.
- 7.2.10 The general aims of the Council's design policies state that housing development should be designed to the highest level both internally and externally. In addition, the Council seeks that developments should have regard for the wider context and environment and should seek to enhance the residential environment and attractiveness as a place to live.
- 7.2.11 Policy 4 of the Local Plan details that all new housing developments will need to achieve a high standard of design and layout whilst enhancing the quality of local places respecting local character, spatial standards, physical context and density. To summarise the Council will expect all of the following requirements to be demonstrated: The site layout, buildings and space around buildings be designed to a high quality, recognising as well as complimenting the qualities of the surrounding areas; compliance to minimum internal space standards for dwellings; provision of sufficient external, private amenity space; provision of play space, provision of

parking integrated within the overall design of the development; density that has regard to the London Plan density matrix whilst respecting local character; layout giving priority to pedestrians and cyclists over vehicles; safety and security measures included in the design and layout of buildings; be accessible and adaptable dwellings.

7.2.12 Policy 37 of the Local Plan details that all development proposals, including extensions to existing buildings, will be expected to be of a high standard of design and layout. To summarise developments will be expected to meet all of the following criteria where they are relevant; be imaginative and attractive to look at, of a good architectural quality and should complement the scale, proportion, form, layout and materials of adjacent buildings and areas; positively contribute to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks or landscape features; create attractive settings; allow for adequate daylight and sunlight to penetrate in and between buildings; respect the amenity of occupiers of neighbouring buildings and those of future occupants; be of a sustainable design and construction; accessible to all; secure; include; suitable waste and refuse facilities and respect non designated heritage assets.

7.2.13 Policy 47 of the Local Plan details that proposals for tall and large buildings will be required to make a positive contribution to the townscape ensuring that their massing, scale and layout enhances the character of the surrounding area.

7.2.14 In terms of the consideration of the height of the building, for assessment purposes the resultant height of the building at a maximum 17.95m to the top of the lift shaft enclosure and 16.95m to the majority of the roof to the fifth floor but with 6 storeys is considered to fall within the remit of tall building policy.

7.2.15 However, while the site is prominent and bounded on three sides by roads, the site itself is generous in its spatial setting and proximity to surrounding properties. This affords some flexibility to the height that a building can achieve on site in terms of long range views, mid range views and immediate views from surrounding streets because the resultant building will be seen in its own immediate context against the backdrop of the surrounding buildings as opposed to being positioned directly against them.

7.2.16 Therefore, Officers consider that the resultant scale and height is acceptable and given that the proposed sixth storey is appropriately set back 2m from the main building elevations. As such the sixth storey is not visually prominent and the development is more perceived as a five storey building (not defined as a tall building) when viewed from the street.

7.2.17 In terms of the design of the elevations, the revised materiality sets out how the design will propose to improve the appearance of the existing building and the elevation drawings and illustrations demonstrate how the proposed changes visually integrate the existing building and proposed upward extension of the building. The arrangement of windows and balconies would provide a sense of rhythm and articulation reflective of the lower floors existing elevations. In design terms, the approach is supported. However, it is recommended that planning conditions are used to protect design quality which is considered central to the

acceptability of the development proposal, particularly works to the existing building, proposed materials and architectural finishes.

7.2.18 The proposed external plant building positioned towards the southern boundary of the site will not be any taller than the garages located outside of the site on Beck River Park with proposed landscaping around the building. This is not considered to harm the character and appearance of the site or locality.

7.3 Standard of residential accommodation - Acceptable

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

7.3.2 Policy D6 of the London Plan relates to 'Housing quality and standards' states that housing development should be of high quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. The policy also prescribes internal space within new dwellings and external spaces standards that are in line with the National Technical Housing Standards.

7.3.3 Policy D7 of the London Plan - Accessible Housing, states that to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and; all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

7.3.4 In this case Part M of the Building Regulations is not directly applicable as the application is for extensions to an existing building.

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

- 7.3.6 The floor space size of each of the additional residential units ranges between 45m² and 120m² respectively over single levels. The nationally described space standard requires various sizes of a GIA depending on the number of bedroom and persons intended. The sizes of the flats have been reviewed on this basis. The floorspace provision for the one bedroom flats falls short of the required GIA of 50m². The units have a double bedroom and are therefore considered a one bedroom two person unit. Given the addition of an external balcony and the sustainable location this minor shortfall is considered acceptable on balance. The shape and room size in the proposed flats is generally considered satisfactory where none of the rooms would have a particularly convoluted shape which would limit their specific internal use by occupiers.
- 7.3.7 A modified internal lift would also be provided and would be accessible to all floors providing level access to all the proposed units. It is considered that the proposal would provide an inclusive living environment for the future occupiers.
- 7.3.8 In terms of amenity space, balconies/terraces are provided for all the additional floors flats. The size of the balconies comply with the provisions generally required in the London Plan. On balance amenity space is considered acceptable for the unit types proposed.
- 7.3.9 Policy D12 of the London Plan states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for fire appliances to be positioned on; appropriate for use as an evacuation assembly and are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire including appropriate fire alarm systems and passive and active fire safety measures; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape, and associated evacuation strategy for all building users; develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in; provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.
- 7.3.10 For buildings less than 18m in height or with six storeys or less, the matter of fire safety compliance is covered by Part B of the Building Regulations. Compliance with the Building Regulations will be required at the appropriate stage of the development.

7.4 Highways – Acceptable

- 7.4.1 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The NPPF clearly states that transport issues should be considered from the earliest stage of both plan making and when formulating development proposals and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

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

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

- Car parking

7.4.4 The Council's Highway Officer has reviewed the application and not raised specific objection to the level of parking provided. However, it is considered that further details of the management of the allocation of the spaces is required in respect that the provision is for the building as a whole across all the existing units and those proposed. Given the close proximity to public transport and Beckenham Junction railway station and resultant sustainable location the proposal is considered generally acceptable from a highway's perspective subject to details of a car parking management strategy.

- Cycle parking

7.4.5 Cycle parking is required to be 1 space for studio and one bedroom units and 2 spaces for all other unit types. A cycle storage area is indicated in the front curtilage close to Blakeney Road. Further details in terms of quantum of spaces and a containment structure are recommended to be sought by planning condition.

- Refuse

7.4.6 All new developments shall have adequate facilities for refuse and recycling. A refuse storage area is indicated in the front curtilage close to Blakeney Road with suitable proximity to the highway for collection services. Further details in terms of quantum of refuse bin provisions and a containment structure are recommended to be sought by planning condition.

7.5 Neighbouring Amenity – Acceptable

7.5.1 Policy 37 of the Bromley Local Plan seeks to respect the amenity of occupiers of neighbouring buildings and those of future occupants, providing healthy environments and ensuring they are not harmed by noise and disturbance, inadequate daylight, sunlight, privacy or by overshadowing.

7.5.2 Policy 4 of the Bromley Local Plan also seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

- 7.5.3 In terms of outlook, the fenestration arrangement will provide outlook from all elevations as per the current arrangement from the lower floors.
- 7.5.4 Concerns have been raised regarding loss of privacy and overlooking to surrounding properties due to the raised height of the building. Generally, it is considered that the fenestration arrangement will maintain privacy to surrounding property due to the separation distances in these directions. Furthermore, views from one property to the curtilage of another in an urban environment is commonplace.
- 7.5.5 A Sunlight and Daylight report has also concluded that all surrounding properties would not experience BRE (British Research Establishment) reductions to their Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH) levels following implementation of the proposed development.
- 7.5.6 The flats within Bouverie Lodge itself have also been assessed in respect of the daylight and sunlight impact that the proposed development may have. The assessments have demonstrated that there may be some alterations beyond BRE guidance to a number of windows within the building. However, on review that the view of skyline would not change there would be no alteration to daylight amenity. The minor impacts of the development in this respect are within the recommended tolerances and BRE guidance. As such this is not considered a reason for refusal in this case.
- 7.5.7 Consideration is also made in respect of the level of occupation of the site in that noise and disturbance will increase due to the increase in intensity of its density use especially with use of the balconies proposed. On balance there will be an increased impact of this nature, however, in an urban environment the increase in terms of noise only is not considered unduly unacceptable at this location.
- 7.5.8 On balance the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance is considered acceptable at this location.

7.6 Sustainability – Acceptable

- 7.6.1 The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. London Plan and Local Plan Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions.
- 7.6.2 Paragraph 9.2.3 of the London Plan states that Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal) and use innovative building materials and smart technologies. This approach will reduce carbon emissions, reduce energy costs to occupants, improve London's energy resilience and support the growth of green jobs.

7.6.3 Local Plan Policy 123 states that all applications for development should demonstrate how the principles of sustainable design and construction have been taken into account.

7.6.4 An informative is recommended with any approval to ensure that the development strives to achieve these objectives.

7.7 Flooding and Sustainable Drainage

7.7.1 Policy S1 12 of the London Plan states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

7.7.2 Policy SI 13 Sustainable Drainage of the London Plan states that 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.

7.7.3 Policy 116 of the Local Plan details that all developments should seek to incorporate sustainable Urban Drainage Systems (SUDS) or demonstrate alternative sustainable approaches to the management of surface water as far as possible.

7.7.4 A small section of the south east corner of the site is located within Flood Zone 2. In terms of ground level development within the scheme, this comprises only of the proposed external plant room. The plant room building is located outside of the Flood Zone 2 boundary and it therefore does not increase or impact local flood risk in the locality. In terms of drainage the upwards extension of the building will not impact surface water run-off rates over and above that which currently exist on site.

7.8 Air Quality

7.8.1 Policy SI 1 Improving Air Quality, outlines in summary that development proposals should not lead to further deterioration of existing poor air quality and shall minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro fitted mitigation measures.

7.8.2 Policy 120 of the Local Plan states that 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.

7.8.3 The site is located within the Bromley AQMA. In this case, given the location close to local roads, it is considered prudent for the development to incorporate Ultra Low NOx boilers for the flats. A condition is recommended in this regard.

7.9 Landscaping

7.9.1 Policy 73 of the Bromley Local Plan states that proposals for new development will be required to take particular account of existing trees on the site and on adjoining

land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained.

7.9.2 Policy 77 of the Bromley Local Plan states that development proposals will seek to safeguard the quality and character of the local landscape and seek the appropriate restoration and enhancement of the local landscape through the use of planning obligations and conditions.

7.9.3 An indicative landscaping layout has been submitted that details the areas given over to hard and soft landscaping. Further details are recommended to be obtained by planning condition in respect of landscaping species and planting.

7.10 Other matters

7.10.1 Concerns from representations received have been raised regarding the initial planning application consultation procedure. All Bouverie Lodge residents have been consulted on 20/05/2021. Additionally, following amendments received to the application a full renotification procedure was carried out again on 09.11.2021.

7.10.2 Comments have been received regarding the construction management process in respect of the specific impacts to existing residents of Bouverie Lodge on the floors below the upwards extension. It is considered prudent that a planning condition is imposed to provide specific details as to how the impacts of the construction process will be managed in respect of the existing residents of Bouverie Lodge to ensure sufficient measures can be secured throughout the whole build programme in the interests of the residential amenities of the residents.

7.11 CIL

7.11.1 The Mayor of London's CIL and the Borough CIL (adopted 15/6/21) is a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

8 CONCLUSION

8.1 Taking into account the above, the proposed development would have a high quality design and would not have an unacceptable impact on the amenity of neighbouring occupiers. It is considered that the site optimisation and unit type of the proposed scheme is acceptable and that the development would not be detrimental to the character and appearance of the area and locality. The standard of the accommodation that will be created will be good. The proposal would not have an adverse impact on the local road network or local parking conditions. The proposal would be constructed in a sustainable manner and would achieve good levels of energy efficiency. It is therefore recommended that planning permission is granted subject to the imposition of suitable conditions.

8.2 On balance the positive impacts of the development are considered of sufficient weight to approve the application with regard to the presumption in favour of sustainable development to increase housing supply.

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

RECOMMENDATION: Application Permitted

Subject to the following conditions:

Standard condition

- 1. Standard time limit of 3 years**
- 2. Standard compliance with approved plans**

Pre-commencement

- 3. Details of a Construction and Environmental Management Plan (specifically taking account of existing residents).**

Prior to above ground works

- 4. Details of landscaping for hard and soft areas.**
- 5. Details of materials.**
- 6. Details of lighting scheme.**
- 7. Architectural details re transitional areas.**
- 8. Scheme for protecting the proposed development from external noise.**
- 9. Specifications of works of sound insulation against airborne and structure-borne noise arising from the lift.**
- 10. Acoustic assessment covering all proposed noise-generating fixed plant.**
- 11. Details of car park management scheme.**
- 12. Details of arrangements for the means of enclosure of a combined cycle storage and storage of refuse and recyclable materials structure.**
- 13. Details of balcony screening**

Prior to occupation/use

- 14. Parking arrangements to be installed as approved.**
- 15. Details of electric car charging points.**

Compliance conditions.

- 16. No additional pipes or plumbing to be installed on outside of buildings.**
- 17. Hardstanding for wash-down facilities.**
- 18. Restrict Plant/Equipment on roof.**
- 19. Slab levels compliance.**
- 20. Restrict New Telecommunications Equipment on roof.**
- 21. Installation of ultra-low NOx boilers.**
- 22. Non-Road Mobile Machinery compliance.**

Any other planning condition(s) considered necessary by the Assistant Director of Planning

Informatives:

- 1. Reminder regarding submission of pre commencement conditions.**
- 2. Contact naming and numbering Officer at the Council.**
- 3. Reminder of CIL payments.**
- 4. Energy efficiency measures.**