

Pike Close Estate, Sundridge

Local Planning Authority: Bromley

local planning authority reference: 21/03622/FULL1

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and phased redevelopment comprising 178 residential units in buildings ranging from 2 to 14 storeys.

The applicant

The applicant is **The Riverside Group Ltd and Countryside Properties** and the architect is **HTA Design**

Strategic issues summary

Land use principles: The redevelopment of the estate to provide new and replacement housing is acceptable in principle. The same quantum of social rent units would be re-provided and there would be an increase in habitable rooms and floorspace terms. The re-provided social rent units would be made available to existing tenants on the same terms as existing. However, with no additional social rent units proposed, the rehousing of adult children has not been addressed through the scheme. An equalities impact assessment should be provided in advance of stage 2 for review and comment.

Affordable housing: The scheme proposes no additional affordable housing beyond the replacement of the existing social rent units. The submitted FVA is currently in the process of being reviewed to ensure that the development delivers the maximum quantum of affordable housing. Early, late and potentially mid stage viability reviews would need to be secured in any Section 106 agreement as well as the social rent tenure of the replacement affordable housing. Other issues on **housing, urban design, transport, and sustainability** also require resolution prior to the Mayor's decision making stage.

Recommendation

That Bromley Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 87. Possible remedies set out in this report could address these deficiencies.

Context

1. On 8 September 2021 the Mayor of London received documents from Bromley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Categories of the Schedule to the Order 2008:
 - 1A "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"; and
 - 1Cc "The building is more than 30 metres high and is outside the City of London"
3. Once Bromley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The existing Pike Close Estate is approximately 1.0 hectares in size and currently accommodates 92 residential units across four residential blocks, three of which are 3 storeys and there is also one 15 storey tower. The site is bounded by Burnt Ash Lane to the east, Kynaston Road, and buildings fronting onto Kynaston Road to the north, allotments and Ravensleigh Gardens to the west, and a residential building (133 Burnt Ash Lane) to the south. A two storey podium car park is also located within the south eastern corner of the site. The double storey parking podium is further located adjacent to the tower and provides parking for the residents of the Estate.
6. The site is not within a conservation area. However, Garden Road Conservation Area lies to the south, albeit some distance from the site (600 metres). There are no listed buildings in the vicinity of the site, the closest is Hollow Bottom Cottage to the south and Baring Hall Hotel to the north, both of which are Grade II listed and more than 800 metres from the site. There are also two locally listed buildings to the south, the Anderson Veterinary Clinic and Halls farm. Sundridge Park, to the south east, is a Grade II Registered Park and Garden. The site is within the Kenwood viewing gazebo to St Paul's Cathedral strategic viewing corridor extension.

7. The site is adjacent to a pair of bus stops serving three routes but the nearest rail station, Grove Park station at just over 1km away is just outside reasonable walking distance. Therefore, the site has a PTAL of 1b, on scale of 1-6.

Details of this proposal

8. The proposals involve the demolition of all existing buildings on site and redevelopment to provide a total of 178 residential units across six residential blocks ranging between two and 14 storeys.

Case history

9. There are no previous planning applications of relevance to the proposals.
10. GLA officers have held three previous pre-application meetings with the applicant regarding their proposals for the site. The first was held on 8 January 2019 (2018/4967/P2i), the second was held on 19 August 2019 (GLA Ref. 2019/4967/P2f/P2F) and the most recent on 23 March 2021 (GLA Ref. 2021/0318/P2F). Meeting discussions covered updates on strategic issues with respect to the principle of development, estate regeneration, housing, affordable housing, urban design, sustainable infrastructure, urban greening and transport.

Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Bromley Local Plan (January 2019) and the London Plan 2021.
12. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - The National Design Guide; and
 - The Affordable Housing and Viability SPG.
13. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth - London Plan;
 - Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Good Quality Homes for All Londoners draft LPG;
 - Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;

- Re-provision of housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Affordable Housing and Viability SPG;
- Urban design - London Plan; Character and Context SPG; Public London Charter draft LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG;
- Strategic views - London Plan, London View Management Framework SPG;
- Heritage - London Plan;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG
- Sustainable development - London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; London Environment Strategy;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Biodiversity - London Plan; London Environment Strategy.

Land use principles

14. London Plan Policy H8 requires that any developments which involve the loss of existing housing be replaced by housing at existing or higher densities with at least the equivalent level of floorspace. In this regard, the development involves the redevelopment of a residential estate comprising 92 existing residential units. The proposals would involve the redevelopment of the site to provide 178 new units resulting in the net gain of 86 homes and a significant increase in floorspace.

Alternatives to demolition

15. As the existing estate contains a number of affordable homes, evidence that due consideration has been given to alternatives to redevelopment balanced against the wider social and environmental impacts of either option must also be provided. In this regard, the applicant states that the estate is overcrowded with many of the units currently not meeting modern accommodation standards. The estate also has significant access issues, with no wheelchair accessible accommodation. It is considered that step free access would not be possible through refurbishment alone. The proposed redevelopment seeks to address current and future housing need to ensure that the housing on the estate can respond to current and emerging need and keep the existing community together in the long term. Furthermore, a ballot was undertaken in March 2019 and 82% voted in favour of redevelopment based on a 90% turnout. In respect

of environmental impacts, it is noted that the existing buildings do not benefit from the use of energy efficient forms of heating and power. The Circular Economy Statement demonstrates that in terms of embodied carbon, the overall emissions of the existing buildings are lower than the new structures for only 40 years at which point the justification for the demolition of the building is justified from an environmental perspective. As such, the principle of demolition of the estate is considered acceptable in terms of consideration of alternatives to demolition.

Like-for-like replacement

16. In addition to this, and as required by Policy H8 of the London Plan and the Mayor’s Good Practice Guide to Estate Regeneration (GPGER), the applicant has confirmed that the proposals would result in the replacement of all existing affordable units, comprising entirely social rented units, and would also result in an uplift in habitable rooms and floorspace as detailed below:

17. Table 1: Existing and proposed social rented units

	Existing	Proposed	Net change
Units	92	92	0
Hab. rooms	226	258	32
Floorspace (sq.m.)	8,082	9,384.6	1,302.6

Full right of return or remain for social tenants

18. The GPGER requires that residents who have to move off site are given a full right to a new home on the regenerated estate of adequate size for their needs, on the same or similar rent and the same security of tenure. In this regard, it has been confirmed that all residents would be have a right to return, all replacement units provided at social rent levels as existing and would be afforded the same security of tenure. This would need to be secured appropriately within the associated legal agreement. The existing estate comprising social rent units only. There are no existing leasehold units.

19. It is noted that the existing estate has experienced significant overcrowding, due in part due to the fact that the existing estate comprises 1 and 2 bed units only. The proposed replacement affordable housing mix has been based upon a recent housing needs survey. As such, the applicant has proposed an improved mix of replacement homes including 3 and 4 bed units. It is also noted that the applicant’s Offer Document (2019) states that it would ensure that adult children of existing residents living on the estate will also be offered a new home on the rebuilt estate. However, with no additional affordable proposed, unless the adult children have all chosen to move off the estate, the development would clearly not fulfil this objective. Furthermore, it is unclear to what extent the replacement units cater to tenants who require wheelchair adapted units. This should be addressed in full prior to stage 2.

20. In line with the GPGER, residents would remain on the site and only have to move once as part of the regeneration process. The redevelopment of the

estate would take place over four phases starting in February 2022 and ending with the landscaping and blocks E and F in March 2031. Whilst the majority of existing social rent tenants would be rehoused Block E would contain 3 social rent units, and therefore these tenants wouldn't be rehoused until the very end of the programme, which is not ideal. Furthermore, Block D, which is also an affordable block will not be delivered until 2029. Ordinarily it is expected that the existing tenants be rehoused within the replacement scheme at the front end of the development programme. However, given that the proposals only seek to replace the existing affordable units and in the interests of creating mixed and balanced communities, the phasing programme is considered acceptable in this instance.

21. The applicant's Offer Document states that all residents have been offered compensation of £6,300 for home loss and the cost of moving would also be reimbursed.

Maximising additional genuinely affordable housing

22. The application has been accompanied by a financial viability assessment (FVA) officers in line with London Plan Policy H8 Part E which is currently in the process of being reviewed by GLA viability officers. However, at this stage no additional affordable housing has been proposed over and above the replacement of the existing affordable housing on the estate as detailed in Table 1 above. Therefore, compliance with this part of Policy H8 would be established once it is ascertained whether the current offer amounts to the maximum reasonable affordable housing offer. If it is not, officers would seek to secure the provision of additional affordable housing accordingly.

Consultation

23. The GPGER also provides clear guidance to developers, housing associations and local authorities on how the design of such schemes should be developed. The overall objectives of estate regeneration proposals should be to:
 - deliver safe and better quality homes for local people;
 - increase the overall supply of new and affordable homes; and
 - improve the quality of the local environment through a better public realm and provision of social infrastructure (e.g. schools, parks, or community centres).
24. Though not a planning requirement, in line with the GPGER, the applicant carried out a ballot between 22 March and 15 April 2019 as it is in receipt of GLA funding. The result was 82% in support of the estate's regeneration with a 90% turnout.
25. The GPGER emphasises the importance in effective engagement with residents and stakeholders in developing plans including the need to be transparent, extensive, responsive and transparent. In this regard, since the residents' ballot, the applicant has held a large number of consultation events

since September 2018 up until May 2021 including workshops and resident events. Several virtual meetings have also been held with local political stakeholders, local community and residents' groups, and wider public consultation meetings to discuss the application throughout early 2021. A consultation website was set up and the estate and wider community was informed of the website via a leaflet drop to 7,500 residents. Following consultation, the following amendments have made to the scheme:

- Altered the massing and architectural treatment of buildings along Burnt Ash Lane to create more generous gaps between the buildings and step down the massing to better relate to the immediate context particularly Kynaston Road.
- Reduced the footprint of some buildings along Burnt Ash Lane, thereby increasing the amount of landscaping at ground level.
- Increased the landscaped and planted area of the site including retention of existing trees.
- Reduced the overall number of homes delivered by one.

26. The submitted SCI includes a copy of the leaflet sent out to residents and details of individual responses. Overall, it is considered that the programme of consultation adopted by the applicant has met the objectives of the GPGER.

Equalities

27. Objective GG1 of the London Plan supports and promotes the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.
28. More generally, the Equality Act 2010 places a duty on public bodies, including the GLA and the Mayor, in the exercise of their functions, to have due regard to the need to advance the quality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
29. Given that the development involves the redevelopment of an existing housing estate including affordable housing, an Equalities Impact Assessment should be prepared. This should comprise a thorough assessment of the impacts of the proposals on protected characteristics in the short, medium and long term as defined by the Equality Act 2010 and the ways in which the applicant has sought to minimise any potential negative impacts.

Housing

30. The development would deliver 178 new and replacement residential units. A net increase of 86 residential units:

Table 2: Existing and proposed mix

Existing						
Tenure	1 bed	2 bed	3 bed	4 bed	Total units	Total hab rooms
Social rent	50	42	0	0	92	226
Market sale	0	0	0	0	0	0
Proposed						
Social rent	44	37	7	4	92	258
Market sale	43	37	6	0	86	227
Total	87	74	13	4	178	485

Affordable housing

31. The development would provide 53% affordable housing by habitable room. There would be no increase in affordable housing beyond the existing in unit terms but a small increase of 32 habitable rooms and 1,303 sq.m. of social rent floorspace. As set out above, it is expected that estate regeneration schemes deliver net additional affordable housing. As such, all such schemes should follow the Viability Tested Route as required by Policy H8 of the London Plan to ensure that the affordable housing offer comprises the maximum reasonable quantum of affordable housing deliverable. Once GLA officers have concluded their assessment of the submitted FVA, the findings would be shared with the applicant and Council officers and additional affordable housing sought if deemed appropriate.
32. As a viability tested scheme, any permission would be subject to early and late stage viability review mechanisms, and possibly a further mid-stage review should one be considered necessary. The provision of these mechanisms would need to be appropriately secured within any Section 106 agreement. It is understood that the affordable housing would comprise 100% social rented units as existing. Again, this should be secured within the Section 106 agreement.
33. A draft Section 106 agreement must be provided to the GLA in advance of Stage 2 referral for review and comment to ensure that the review mechanisms and affordability clauses have been captured appropriately.

Play space

34. London Plan Policy S4 states that development proposals should include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child that is not segregated by tenure.
35. Based on Table 2 above, and assuming all of the affordable housing is social rented, the play space requirement for the development is currently 1015 sq.m. for children aged 5-11 years old. This is based on an outer London site with a PTAL of 2. The applicant proposes 845 sq.m. of play space in total. This comprises 491 sq.m. of space for children aged 0-4 years old and 346 sq.m. of space for children aged 5-11 years old, and 116 sq.m. for children aged 12+. As such, the proposed play space falls short of meeting the requirements of London Plan Policy S4.
36. The proposed play space is mainly located in the central area of open space. However, as noted at pre-application stage, this area is surrounded on all sides by access roads and car parking which raises concerns regarding the safety of residents and especially children accessing the play space and potential conflict with cars. There is a low fence proposed around this space but there are no demarcated crossing points identified on the plans, which would assist in reducing opportunities for conflict. A crossing point should be provided from the tower to the play space as a minimum. The applicant would need to confirm that all tenants would be able to access the proposed play space, irrespective of tenure.
37. The applicant has identified existing play space within 400 metres at King's Meadow Playing Fields and within 800 metres at Wydeville Manor Road as appropriate for 12+ play. Meadow Playing fields is relatively accessible via Burnt Ash Road and contains playing fields and a newly renovated playground. However, further details of the location of Wydeville Manor Road and its play facilities should be provided to be considered an appropriate off-site alternative. The Council should ensure that the applicant makes an appropriate contribution to play space offsite.

Residential mix

38. Policy H10 of the London Plan states that developments should provide a mix of housing sizes and tenures and that developments with more one and two bed units should be provided in areas with higher public transport accessibility and/ or town centres. For low cost rent products, unit mix should be based upon housing need. In this regard, in overall terms, the development provides a much higher proportion of one and two bed units at 90% of the total. For a site with a PTAL of 1b, this is a very large proportion. However, it is acknowledged that the existing site comprises one and two beds entirely. The replacement housing mix has been based upon an up to date housing needs survey, which identifies the need for additional family sized units due to overcrowding. As identified above, the applicant should indicate how it is intending to resolve overcrowding where adult children are still residing in units.

Residential quality

39. London Plan Policies D4 and D6 promote high quality in new housing provision, with further guidance provided in the Mayor's Housing SPG. Good Growth Objective 3 also sets out the Mayor's expectations in creating a healthy city.
40. The units would all meet the minimum size standards as set out in table 3.1 of the London Plan. However, confirmation is required that the residential units also comply with private internal and external space standards as set out in Policy D6 of the London Plan. The proportion of dual aspect units has been optimised but the applicant should confirm that the remaining single aspect units would be afforded adequate ventilation, daylight and avoid overheating as required by Policy D6.

Urban design

41. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Development layout

42. It is noted the site layout is highly constrained as a result of the single decant principle. Yet, despite this, the proposals seem logical and represent a generally well-considered use of the site.
43. The 12.5 metre separation between buildings A, B and C is acceptable considering the location and orientation of the habitable rooms (living rooms / balconies in particular).
44. Given that building F is so small, it is unclear as to why it has not been subsumed into building E. There is notable opportunity to relocate these dwellings within building E through reshaping / the introduction of stacked duplexes / triplexes etc. This would provide an opportunity for a significant increase in the area of communal open space within the site and may therefore provide scope to introduce further soft landscaping into the scheme and thereby increase the Urban Greening Factor score, which is currently reporting a shortfall. In response to the neighbouring context to both the north and south edge conditions, the built form proposals appear to suitably reduce in height and, as such, provide an appropriate scale in response.
45. Block B is particularly close to the street and would benefit from an increased setback to introduce additional soft landscaping and therefore soften the streetscape and the base of the building. It is unclear why the substation has not been incorporated into the built form. In any event, the treatment (façade and roof) of the pavilion substation and generator buildings within the landscape should be clarified.

Scale and massing

46. The site is not explicitly identified as appropriate for the development of tall buildings in the Local Plan as required by Policy D9 of the London Plan. Therefore, the proposals do not comply with this element of the policy. As such, the applicant is required to demonstrate how the proposed development would meet the tests of Part C of this policy, in respect of visual, functional and environmental impacts. In this regard, the applicant has provided some justification in visual, environmental, functional and cumulative terms for the proposed height of the development. In order to be considered acceptable, the applicant would need to fully address these issues.
47. The site is located within the background extension of the Parliament Hill Summit to St Paul's Cathedral LVMF view. This has not been considered in the townscape assessment. The applicant has confirmed that it has attempted to model the impact of the development but given the significant distance of St Paul's Cathedral from the site (21 kilometres), it is not possible to get a clear enough view to the site. Notwithstanding that it is highly unlikely that the development would be visible, evidence that this assessment has been carried out should be provided.

Public realm

48. The on-street car parking dominates the public realm. As a result, the hierarchy of the public realm does not currently prioritise pedestrians. As previously stated, routes from each of the buildings to the external communal amenity space should be enhanced and raised tables / thresholds / crossings introduced where appropriate.
49. The main communal amenity area would be delivered within Phase 4 of the proposals which is the last stage of the redevelopment. The applicant should consider whether a portion of this space could be delivered as part of an earlier phase.

Architectural quality

50. Considering Building B as the centrepiece of the development, there appears to be an overly complicated vertical arrangement of different "striped" brick finishes. Further simplicity would help provide calmness and clarity to the underlying design intent. To assist, additional horizontal elements should also be considered. The end presentation of parapet walls at the crown / top of the building fronting the street also appears "unfinished" in nature.
51. At the base of the Burnt Ash Lane fronting buildings, there are numerous applications of the black and white Flemish bond brickwork. The top horizontal alignment of which should better respond to the adjacent fenestration and balcony openings, additional soldier coursing provided or an alternate approach should be explored. The treatment and visual permeability of the balconies should be clarified considering they appear particularly 'solid" in nature and will provide poor outlook for residents.

Fire safety

52. In line with Policy D12 of the London Plan, development proposals must achieve the highest standards of fire safety.
53. The application is supported by a Fire Safety Statement prepared by Ashton Fire which addresses the various requirements of Policy D12. The Council must secure all the proposed measures as detailed in the statement through appropriate planning conditions.

Inclusive access

54. Policy D5 of the London Plan requires all developments to meet the highest standards of accessible and inclusive design. In this regard, proposed lifts would be passenger lifts and meet Building Regulations requirements. However, confirmation is required that an appropriate number of fire evacuation lifts would be provided per core. Plans showing space for these lifts must be provided and their provision must be secured by condition. Otherwise, the proposals are in line with London Plan Policy D5 and should be secured through appropriate conditions.
55. In accordance with London Plan Policy D7 10% of dwellings are to be provided as M4(3) 'wheelchair user dwellings' and the remainder as M4(2) 'accessible and adaptable dwellings'. However, it is unclear whether any of the existing residents would require a replacement wheelchair unit from the outset. These units should be provided in addition to the 10% baseline requirement. This should be secured by condition.

Heritage

56. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.
57. Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.
58. Paragraph 194 of the NPPF further specifies that in determining applications, local planning authorities should require an applicant to describe the significance of any affected heritage assets, including any contribution made by their setting. Furthermore, paragraph 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or

indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

59. The site is not within a conservation area. However, Garden Road Conservation Area lies to the south of the site. There are no listed buildings in the vicinity of the site, the closest is Hollow Bottom Cottage to the south and Baring Hall Hotel to the north, however, neither is less than 500 metres from the site. Both of which are Grade II listed. There are also two locally listed buildings to the south, the Anderson Veterinary Clinic and Halls farm. Sundridge Park, to the south east, is a Grade II Registered Park and Garden.
60. A Townscape, Visual and Heritage Assessment has been produced by the applicant. The document assesses the impact of the development on a number of views from around the site. Due to the fact that there is already a 15 storey tower on the site, it is already relatively visible in most of the identified views. Although more of the development would be visible from these views, given the high quality of the scheme, when compared to the existing, it is not considered that the development would give rise to any harm to the significance of any of the designated heritage assets in the vicinity of the site. The Council should consider the impact on non-designated assets to allow officers to provide an update at Stage 2.

Transport

Public transport and highways impact

61. From the multi-modal assessment provided, a significant residual impact on the local or strategic highway or public transport network would not be anticipated.

Healthy Streets and Active Travel Zone

62. The applicant has stated that this development will provide 'excellent north - south and east – west connectivity'. However, the proposed plans have not achieved this; only showing one shared access point for all modes of transport via Kynaston Road. In line with Vision Zero, more segregated walking and cycling routes should be provided across the site, increasing permeability.
63. The existing pedestrian crossing refuge islands on Burnt Ash Lane are too narrow for wheelchair and buggy users and those with small children to safely use which also impacts on access to southbound bus services. The increased width of the islands should be secured through a s278 agreement and consideration should be given to the provision of zebra or light controlled crossings. These would help to support Vision Zero and Healthy Streets criteria: 'pedestrians from all walks of life' and 'easy to cross' in line with London Plan Policy T2.

Car Parking

64. 91 car parking spaces have been proposed for this development, which is equivalent to a parking ratio of 0.61. Whilst the quantum of car parking does not exceed the maximum in London Plan Policy T6.1 (noting the PTAL of 1b), the applicant expects 45% of trips would be made via private vehicle. Improvements to active travel routes and access to buses along with good cycle parking provision and an effective travel plan would be needed to facilitate a strategic modal shift at this site in line with Policy T1 to meet the Mayor's objective that by 2041 80% of all trips in London are made by sustainable modes.
65. Three disabled person parking spaces are proposed which is equivalent to 2% of dwellings having access to a disabled persons' parking space from the outset. For the whole development, five disabled person parking spaces should be accessible from the outset, in line with London Plan Policy T6.1 a Parking Design and Management Plan should be secured through condition, which will detail how further spaces can be provided, as and when demand arises, in line with Policy T6.
66. At least 20% of parking spaces will have active electric vehicle charging points (EVCP) with passive provision for all remaining spaces, in line with London Plan minimum requirements. This should be secured through condition. It is encouraged that all disabled persons' parking is provided with active EVCP from the outset.

Cycle Parking

67. 317 long-stay and six short-stay cycle parking spaces have been proposed. Whilst meeting the numerical minimum standards in London Plan Policy T5, the proposals are not in line with London Cycle Design Standards (LCDS). The applicant is advised that access to cycle stores should be via internal lobbies rather than via the public realm for security reasons; clarification is required regarding the location of parking for building E; properly scaled plans are required; and wider access provision provided outside of building F. Amendments to the design and layout of the cycle parking are therefore required and should be prior to determination of this application to enable delivery of a policy compliant scheme.

Delivery and Servicing and Construction

68. Delivery and servicing are proposed to take place on site. However, the swept path analysis shows that vehicles will be expected to turn around on private highway outside of the boundary. Therefore, the applicant should confirm the relevant permissions exist for this arrangement.
69. Further information is required to ensure delivery and servicing, including waste collection, is undertaken to meet the Mayor's Vision Zero approach. In addition, noting the increase in on-line deliveries, further assessment is required to demonstrate that the proposed arrangements can safely accommodate

demand without impact on other parts of the scheme including the public realm or upon pedestrian and cycle provision.

70. A detailed Delivery and Servicing Plan should be secured through condition, in line with Policy T7 of the London Plan.
71. A full Construction Logistics Plan is required through condition in line with London Plan Policy T7. However, at this stage further discussion is required with TfL in respect of the proposed permanent relocation of the bus cage adjacent to the site and any changes to passenger facilities and access during the works. Should TfL agree to this being moved, the applicant will have to pay for this, and it would be subject to the usual consents.

Travel Plan

72. An outline travel plan has been provided, however, the targets identified are not in line with the Mayor's Strategic Mode Shift target and revisions are required. Additional measures are required to facilitate an active mode shift. These should be incorporated into an updated travel plan. A full travel plan should be secured through condition in line with Policy T4 of the London Plan.

Sustainable development

Energy strategy

73. The applicant has submitted an energy strategy; however, additional information should be submitted in accordance with the detailed technical comments that have been sent to the applicant and the Council under separate cover.
74. In summary, the following is required: further energy efficiency measures; overheating clarifications; information required on district heating potential and future-proofing; information on the PV potential required; and information on the proposed air source heat pumps (ASHPs) to meet the requirements of London Plan Policy S12.
75. The applicant should also review the 'Be seen' energy monitoring guidance to ensure that it is fully aware of the relevant requirements to comply with 'be seen' policy. The Council should secure these monitoring requirements via a Section 106 agreement.

Whole Life Carbon

76. In line with London Plan Policy S12, the applicant has submitted a Whole Life Carbon assessment. Detailed technical comments have been sent to the applicant and the Council under separate cover. The main comments are that the material types and quantities table needs to be fully completed, with each material/product included, listed and assessment 2 should be completed as well as assessment 1.

77. The Council should secure via condition the submission of a post-construction assessment to report on the development's actual WLC emissions.

Circular Economy

78. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. The applicant has submitted a Circular Economy Statement and detailed technical comments have been sent to the applicant and the Council under separate cover.
79. The Council should secure via condition the submission of a post-construction report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement.

Environmental issues

Urban greening

80. As Bromley Council's Local Plan has not yet adopted an urban greening factor for new developments then predominantly residential developments are required to achieve an urban greening factor score of 0.4 in accordance with Policy G5 of the London Plan. An urban greening factor score of 0.37 has been calculated for the development owing in part to the overdominance of parking and vehicular routes. Opportunities to improve the overall score have been identified in the urban design section of this report and should be explored further prior to Stage 2.
81. The applicant has indicated that the proposed development would secure a net biodiversity gain of 12.33% in accordance with Policy G6(D) of the London Plan, which is welcomed.

Sustainable drainage and flood risk

82. The submitted Flood Risk Assessment generally complies with London Plan Policy SI12. The surface water drainage strategy for the proposed development generally complies with London Plan Policy SI13; however, rainwater harvesting should be incorporated and further above ground green SuDS should be shown on the drainage strategy plan. The applicant should also consider water harvesting and reuse to reduce consumption of water across the site in line with Policy SI5 of the London Plan. This can be integrated with the surface water drainage system to provide a dual benefit. Further detailed technical comments have been provided to the Council and applicant for further consideration.

Local planning authority's position

83. Bromley Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

84. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

85. There are no financial considerations at this stage.

Conclusion

86. London Plan policies on estate regeneration, equalities, affordable housing, urban design, heritage, transport and sustainability are relevant to this application. Whilst the proposal is supported in principle, the application does not currently comply with these policies, as summarised below:
- **Land Use Principles:** The redevelopment of the estate to provide new and replacement housing is acceptable in principle. The same quantum of social rent units would be re-provided and there would be an increase in habitable rooms and floorspace terms. The re-provided social rent units would be made available to existing tenants on the same terms as existing. However, with no additional social rent units proposed, the rehousing of adult children has not been addressed through the scheme. An equalities impact assessment should be provided in advance of stage 2 for review and comment.
 - **Affordable housing:** The scheme proposes no additional affordable housing beyond the replacement of the existing social rent units. The submitted FVA is currently in the process of being reviewed to ensure that the development delivers the maximum quantum of affordable housing. Early, late and potentially mid stage viability reviews would need to be

secured in any Section 106 agreement as well as the social rent tenure of the replacement affordable housing.

- **Play space:** The quantum of proposed playspace would fall below the on-site requirement. The main playspace area is not currently afforded a safe means of access, this must be remedied. The Council should secure an appropriate payment in lieu to off-site provision to make up the shortfall. However, it is not clear where one of the alternative off-site play spaces are in relation to the site, this should be clarified. This must be remedied prior to Stage 2.
- **Residential mix and quality:** The mix is based on current housing needs across the estate however, it is unclear how the development would cater for adult children and residents requiring wheelchair accessible housing. The quality of the residential units is generally acceptable. However, confirmation is required that they would meet the detailed space standards as set out in Policy D6 of the London Plan.
- **Urban design:** The applicant should consider combining buildings E and F to increase soft landscaping and should set building B further back from the street. Safe crossings should be provided throughout the development and the delivery of the main public realm brought forward if possible. The materiality of the tallest block requires simplification. The treatment of the Burnt Ash Lane frontages and balconies should also be reconsidered. For the height of the tall building to be considered acceptable, the applicant would need to address its visual, functional, environmental and cumulative impacts.
- **Transport:** Improvements are required for active travel both within and outside the site and the Travel Plan revised to promote sustainable travel to deliver the Mayor's strategic mode shift target. Further work is also required in relation to the delivery and servicing arrangements and discussion with TfL on construction impacts on bus operations. Amendments are required to cycle parking to ensure alignment with both parts of Policy T5 of the London Plan.
- **Sustainable development:** In respect of the energy strategy, the following is required: further energy efficiency measures; overheating clarifications; information required on district heating potential and future-proofing; information on the PV potential required; and information on the proposed ASHPs. Comments regarding the submitted circular economy report and whole life carbon assessment have been issued to the Council and applicant for review and should be addressed.
- **Environmental issues:** The UGF score falls short of the 0.4 required target score. This should be reviewed in light of the urban design comments. Comments regarding drainage and water use should also be addressed.

For further information, contact GLA Planning Unit (Development Management Team):

Hannah Thomas, Principal Strategic Planner (case officer)

email: hannah.thomas@london.gov.uk

Reece Harris, Team Leader – Development Management

email: reece.harris@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

We are committed to being anti-racist, planning for a diverse and inclusive London
and engaging all communities in shaping their city.