

Segas Sports Club, Beckenham

Local Planning Authority: Bromley

Local Planning Authority reference: 21/05503/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 all existing buildings on site and redevelopment to provide residential development comprising a mix of 95 houses and apartment blocks (part 3 and part 5 stories in height), including provision of 52% affordable housing, alongside the provision of public open space fronting Worsley Bridge Road, onsite play space and areas for public sports facilities, associated landscaping, car parking and ancillary works.

The applicant

The applicant is **Caerus Developments**, and the architect is **Davis Architect**.

Strategic issues summary

Land use principles: The development is inappropriate development on Metropolitan Open Land. Given the harm that would be caused, the VSC put forward do not justify the proposed development on MOL. The partial loss of the playing fields is not justified, and further information is needed to determine whether the new sports facilities would outweigh this loss. As it currently stands, the proposed development is not acceptable in land use terms (para 14 to 31).

Affordable housing: The provision of the 52% affordable housing must be quantified by habitable rooms, and a tenure split provided, and a viability assessment must be submitted as the proposal would be inappropriate development on MOL. Early and late stage reviews are required (Para 32 to 39).

Other issues on **urban design, sustainable development and environmental issues**, and **transport** also require resolution prior to the Mayor's decision-making stage (Para 40 to 86).

Recommendation

That Bromley Council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 90. Possible remedies set out in this report could address these deficiencies. The Mayor does not need to be consulted again if the borough decides to refuse the application.

Context

1. On 10 January 2022 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 Mayor's Order 2008:
 - Category 3D: *“Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building.”*
 - Category 3C: *“Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which— (a) is used as a playing field at the time the relevant application for planning permission is made; or (b) has at any time in the five years before the making of the application been used as a playing field.”*
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; or allow the Council to determine it itself. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission.
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 application site which has an area of approximately 2.14 hectares is in private ownership and comprises a rectangular plot of land on the northern side of Worsley Bridge Road. The site is within Metropolitan Open Land (MOL) and forms part of the South East London Green Chain (SELGC). The site is not within a Conservation Area, or within the setting of any listed buildings.
6. To the eastern part of the site, there is a large expanse of hardstanding, which was used as the vehicular access to the site and as a car park. Alongside this is a large former clubhouse and storage facility. To the west of the parking area and clubhouse the site remains predominantly open, albeit is in an overgrown state and comprises redundant former playing fields.
7. The site is adjacent to part of the borough highway network. Bromley Road, the nearest part of the Transport for London Road Network (TLRN) is

approximately 1.5 kilometres away. The nearest part of the Strategic Road Network is approximately 500 metres away on Beckenham Hill Road. The site is adjacent to a southbound bus stop with the northbound one across the road. These serve one route. Lower Sydenham rail station, providing services between Central London and Kent is about 500 metres away. Consequently, the site has a public transport accessibility level (PTAL) of 2, on a scale of 1-6b, where 6b is the highest.

Details of this proposal

8. The detailed application seeks permission for the demolition of all existing buildings on site and redevelopment to provide residential development comprising a mix of 95 houses and apartment blocks (part 3 and part 5 stories in height), including provision of 52% affordable housing (by units), alongside the provision of public open space fronting Worsley Bridge Road, onsite play space and areas for public sports facilities, associated landscaping, car parking and ancillary works.

Case history

9. A pre-application meeting was held between the project team and GLA officers on 13 April 2021 (GLA reference 2021/0275/P2I) to discuss the redevelopment of the site to provide 121 residential units with associated parking, amenity space, a publicly accessible park, and a new access road from Worsley Bridge Road. The meeting covered strategic issues with respect to; land use principles, housing and affordable housing, urban design and inclusive access, noise and air quality, sustainable development, and transport. The key advice in terms of land uses provided to the applicant was that although the site partly comprises previously developed land, the majority does not. As such, the development would cause substantial harm to openness and the relevant exception tests in the NPPF would not be met and thus the development would constitute inappropriate development in the MOL, meaning that to be policy compliant, very special circumstances would have to be demonstrated.

Strategic planning issues and relevant policies and guidance

10. 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 2019 Bromley Local Plan; and the London Plan 2021.
11. The following are relevant material considerations:
 - The National Planning Policy Framework (2021) and National Planning Practice Guidance;
 - The National Design Guide (2021).
12. 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; Housing Design Standards draft LPG;
 - Affordable housing - London Plan; Housing SPG; the Mayor’s Housing Strategy; Good Quality Homes for All Londoners draft LPG;
 - Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;
 - Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG;
 - Sustainable development - London Plan; London Environment Strategy; ‘Be Seen’ Energy Monitoring LPG; Circular Economy Statements draft LPG; Whole Life-Cycle Carbon Assessments draft LPG; Urban Greening Factor draft LPG;
 - Air quality - London Plan; the London Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral draft LPG;
 - Transport - London Plan; the Mayor’s Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG;
13. On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer’s recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).

Land use principles

Metropolitan Open Land (MOL)

14. London Plan Policy G3 makes clear that Metropolitan Open Land (MOL) should be accorded the same status and level of protection as Green Belt and should be protected from inappropriate development in accordance with national planning policy tests. Therefore, inappropriate development within MOL should also be refused except in VSC as according to the NPPF Para 147, “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”
15. Paragraphs 149 of the NPPF sets out conditions where the construction of new buildings in MOL is not considered inappropriate development. One of the exceptions listed at paragraph 149(g) of the NPPF relates to: *limited infilling or the partial or complete redevelopment of previously developed land (PDL), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development.*

16. The NPPF defines PDL as: *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.”*
17. Apart from a small area of hard standing and built development at the edge of the site, the site is largely open, green space. The majority of the site does not therefore constitute previously developed land, and the proposal to build over a substantial portion of the open space would cause substantially greater harm to openness, does not meet any of the exception tests in the NPPF. Therefore the development is inappropriate development within MOL, contrary to London Plan Policy G3 and a VSC case must be demonstrated to justify the development.

Very special circumstances

18. The applicant has argued that due to the site’s existing poor conditions as contaminated land, with no public access and its cessation as a sport playing field, the site could no longer be considered as MOL, therefore, the proposed development is appropriate development. However, GLA officers advise that the status of the site is still MOL, and the only way to re-designate its status is through a plan-led process, therefore, this argument for appropriateness of the proposal is not accepted.
19. Notwithstanding the above argument the applicant has set out a VSC case which includes: private housing delivery, affordable housing delivery, public open space / sporting facilities, economic benefits, biodiversity and ecological enhancement to the SE London Green Chain, and decontamination of contaminated land. Collectively, the applicant considers that the benefits of the proposal clearly outweigh the harm identified to the MOL and amount to VSC.
20. The applicant has referenced the Inspectors’ conclusions on the recent Footzie Social Club appeal (APP/G5180/W/20/3257010). In its view this shows that the policies in the development plan most relevant to the determination of applications in the Borough are now out of date, meaning they attract reduced weight for the purposes of assessing applications involving housing development in the Borough. The applicant also argued that in allowing the appeals on this site, the Inspector agreed that Bromley Council could not demonstrate a five-year housing land supply and therefore gave “very substantial weight” to the delivery of housing (including some affordable housing) in the appeal scheme.
21. The appeal decision and the Inspector’s conclusions are acknowledged, and weight should clearly be given to the delivery of housing and affordable housing in Bromley. However, local authorities must give “substantial weight” to any harm caused to Green Belt/MOL. The level of harm will differ from case to case, meaning in turn that the delivery of housing will not always outweigh the harm caused to Green Belt/MOL. In this case, the proposal would involve the construction of 95 dwellings plus associated development on undeveloped green open space. The harm to openness would be considered in this case to be substantial and irreversible, as it would effectively turn a green field that

limits the extent of the urban area, into an extension of the built-up area. The appeal decision is not therefore considered to set a precedent for future building of houses on MOL in Bromley. The delivery of housing must be balanced against the level of harm, and in this case the level of harm is substantial. In itself, then, the delivery of housing is not considered to outweigh the harm that would be caused to the MOL.

22. Turning to the other items identified as VSC, the provision of public open space fronting Worsley Bridge Road, onsite play space and areas for public sports facilities are welcomed, and some weight can be given to this. Subject to justifying the partial loss of the sports facilities or showing that the new facilities clearly outweigh the loss, the sports facilities could carry some weight. However, a significant portion of the site would contain built development and arguably the benefits of public access could be achieved without the extent of development proposed. This does not, in officers' view, carry substantial weight to outweigh the harm caused to the MOL.
23. The economic benefits from construction are temporary and can be achieved through developing any other more appropriate site in London. The biodiversity and ecological enhancements are welcomed, although again these could be achieved without the level of development proposed and are undermined by the fact that current green open space would be built over, thus losing/eroding the link in the green chain. Decontaminating of contaminated land would be a necessary part of any development so cannot be considered as a VSC. Together, none of these arguments can be given significant weight.
24. The applicant should also show how alternative sites have been considered and demonstrate that there are no available brownfields in the area and that the application site is the only site suitable, viable and available to accommodate the proposed development.
25. In summary, the proposed development would cause substantial harm to the openness of the MOL, and the decision maker must give this substantial weight. The benefits of housing and affordable housing delivery and the provision of a public park will weigh in the balance. However, given the level of harm proposed, officers do not consider that these benefits, and any other benefits identified, collectively outweigh the harm to the MOL based on the information provided as part of the application. Officers do not currently consider that very special circumstances have been demonstrated that would justify the proposed development on MOL.

Playing fields

26. London Plan Policy S5 states that existing sports and recreation facilities should be retained unless an assessment shows the land to be surplus to requirements; that there would be equivalent or better provision to replace the loss; or the development is for alternative sports and recreational provision, which would clearly outweigh the loss. The proposed development would re-provide some sports facilities, including potential space for a 7-a-side football pitch, a bowls lawn, a parkour area, tennis court and/or a basketball court, subject to further consultation with local sports and community groups.

27. Whilst this new provision is welcome, as stated above the site has the potential to accommodate a larger area of playing fields and it is not clear that the level of built form justifies the partial loss of the playing fields. The applicant has sought to justify the loss of the playing fields on the basis that these are surplus to requirements, given local increases in pitches and that the enhanced and publicly accessible space outweighs this loss.
28. In respect of the loss of the former sports use at the site, the applicant argues the Council's evidence base and the evidence submitted with the application show a surplus of such facilities in the surrounding area and a deficit of children's play space and access to public open space. Additionally, the applicant has undertaken a marketing exercise which demonstrates a lack of viable demand for the use of the site. The Council should review this information, given it relates to its local evidence base, to allow GLA officers to determine whether the existing playing fields are surplus to requirements as suggested. The applicant should also show how these facilities meet Sports England guidance for outdoor sports to show that the provision is an enhancement. Sport England's view on this should be sought and submitted for further consideration, noting the Planning Statement suggests that it initially objected to the pre-application proposals.
29. As such, the applicant has not adequately demonstrated that the partial loss of the playing fields is justified, or that enhanced sports facilities would outweigh this loss, contrary to Policy S5. In any case, it is noted that the partial loss of the playing fields would still be contrary to Policy G3 of the London Plan given it is the result of inappropriate development.

Housing

30. London Plan Table 4.1 sets a 10-year target for net housing completions (2019/20 -2028/29) for Bromley as 7,740 housing units. This application which proposes the delivery of 95 houses, therefore, constitutes 1,23% of the 10-year target, which is welcomed. However, as discussed above the land use principle is not yet supported.

Conclusion on land use principles

31. As it currently stands, the proposed development is not acceptable in land use terms.

Affordable housing

32. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35% by habitable room to follow the fast track route. Schemes that can follow the fast-track viability route and are not required to submit viability information nor be subject to a late stage viability review.
33. Policy H6 of the London Plan sets out a preferred tenure split of at least 30% low-cost rent (London Affordable Rent or social rent), at least 30% intermediate

(with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority taking into account relevant Local Plan policy. It is the expectation, however, that the remaining 40% is weighted towards affordable rented products.

34. Bromley Local Plan Policy 2 states that for proposals providing over 11 residential units, the Council will seek 35% provision with 60% social rented/affordable rented housing and 40% intermediate provision. Low cost rented units must be appropriately secured at London Affordable Rent or social rented levels. The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report, including a range of income thresholds. Affordability thresholds must be secured in the section 106 agreement attached to any permission, as well as the relevant review mechanisms.
35. The applicant proposes a minimum of 52% affordable housing by units. However, clarification is required the provision in terms of habitable rooms and the tenure split.
36. Whilst the delivery of over 50% affordable housing with the proposed tenure mix would be welcomed on a site that is appropriate for development and would follow the Fast Track Route in that instance, in this case the development is inappropriate. London Plan Policy H5 sets out that schemes that achieve a minimum threshold of affordable housing and provide the specified tenure split, without public subsidy, "while meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor can follow the 'Fast Track Route". As the proposals are not considered to meet policy requirements in relation to preventing inappropriate development and harm to MOL, the scheme would not be able to follow the Fast Track Route and would be viability tested.
37. Therefore, the applicant must submit a viability appraisal well ahead of any Stage Referral so that GLA officers would have sufficient time to assess the viability report.
38. Affordability levels must be confirmed prior to the Mayor's decision-making stage 2 referral and appropriately secured via S106. Both early and late stage review mechanisms must be secured.
39. GLA officers request early engagement on the wording of the S106 agreement to ensure that the wording for review mechanisms and affordability is effective and meets London Plan policy requirements.

Urban design

40. 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.

Site layout and public realm

41. Further detail is required on whether a design option had been explored that pushed the western access road to the western boundary of the site to avoid the road dissecting the proposed public open space.
42. The applicant should consider further refinement to all edge conditions of the site to provide opportunities for ecologically diverse corridors, particularly, at the rear of the residential terraces on the northern and north-eastern boundaries. Private fences, integrated furniture and material choices may impact wildlife movement corridors as presented within the Landscape Design Statement.
43. It is unclear what the small pavilion building is fronting Worsley Bridge Road towards the western corner of the building – it is potentially either changing facilities or a substation. Its visual treatment must carefully be considered given its prominent location from the highway and proposed public realm.
44. Construction of hard / artificial sport courts, whilst providing public benefit, have the potential to provide little ecological benefit and do not help to enhance the greenery of the MOL site. Extensive further areas of 'wild planted areas' should be explored to help promote ecology, help enhance the greenery of the MOL site and increase visual screening of the built form.

Built form, height, and massing

45. The location of the proposed built form, away from the public southern edge of the site, is generally supported, as is the stepping down in height in response to the surrounding residential buildings in the context of development within MOL.
46. The roof terraces on the five storey "pavilion" buildings are located on their northern sides. Whilst this may help with the height transition down to the terraces on the opposite side of the street, it is unclear how these will perform from a daylight / sunlight perspective and therefore what amenity they provide for residents or whether or not they are an appropriate location for PV panels as indicated.
47. As evident in Viewpoints 2 and 3, the three "pavilion" buildings appear to be of consistent height, materiality, and general overall design, which is welcomed. However, additional facade expression / articulation / changes in height should be explored to provide greater visual interest.
48. The TVIA provided contains limited information. It should be updated to provide "existing" and "proposed" views / AVRs. It is unclear within the seven views of Appendix 1 what built form is existing and what is proposed.

Residential quality

49. All residential units have been designed to high quality to provide future occupiers with a high standard of living accommodation and all units would

meet or exceed the minimum space standards. All units would be at least dual aspect with the exception of the two middle units in Blocks A, B and C, totalling 2 per floor, 6 per block, 18 in total (17%). However, it is noted that these units will all be either east or west facing with their own demise balcony amenity space, therefore providing a high standard of residential accommodation, subject to further information on overheating as detailed in the energy section below.

50. That said, ground floor access to residential dwellings within the three “pavilion” buildings should be explored. This will help provide activation around the base of the building and would provide internal space planning efficiencies. Sunlight and Daylight testing (including Average Daylight Factor calculations) should be undertaken at the earliest opportunity to gauge compliance with the relevant BRE guidance. Provided these issues are addressed, the residential quality would fully meet the standards set out in London Plan Policy D6.
51. It is also noted that in line with Policy S4 of the London Plan, the development will be providing 1,360sqm of children’s play area with 1,082sqm of dedicated play equipment, which is welcomed and should be secured appropriately by condition.

Fire safety

52. In line with Policy D12 of the London Plan the applicant has submitted a fire safety statement, prepared by a suitably qualified third-party assessor, which addresses the criteria of Policy D12, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. In line with Policy D5 of the London Plan, the development incorporates fire evacuation lifts suitable to be used to evacuate people who require level access from the buildings.
53. Bromley Council must secure the proposed measures in the fire safety statement with appropriate conditions.

Inclusive access

54. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The planning application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation, or special treatment.
55. Policy D7 of the London Plan requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’ (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.
56. The applicant has submitted an inclusive access statement as part of the design and access statement which satisfy the above policies. 10% of the total

number of residential units will be designed to be capable of easy adaptation to meet the needs of wheelchair users, in line with the above policies. All dwellings will be accessed via communal entrances with revolving and automated side-hung doors. Further, all residents of wheelchair adaptable homes at upper levels will have access to second lift and there will be one fire-fighting lift in each residential core.

57. Bromley Council must secure the proposed measures in the inclusive access statement with appropriate conditions.

Transport

Healthy Streets and Active Travel Zone (ATZ) Assessment

58. The residential element of the site is car dominated, contrary to London Plan Policy T2 Healthy Streets. As detailed below, a reduction in car parking is sought to align with policy. This should help to alleviate car dominance at this site.
59. Pedestrian and cyclist access to the residential element of the scheme involves going past the sporting facilities which front onto Worsley Bridge Road. There is no real provision for overlooking especially when these facilities are not in use. This raises personal safety concerns for pedestrians and cyclists, particularly at night. It should be demonstrated how the personal security of these groups will be protected, e.g. through increasing the potential for these routes to be overlooked. Better still, additional routes into the site which are overlooked and well-lit should be provided. This will also increase the pedestrian and cyclist permeability, which is currently poor. Whilst the northbound bus stop is opposite the site there is no provision for a safe and convenient crossing of the road and similar issues apply to the route to/from Lower Sydenham station. Further work is required to identify improvements and secure these via agreement or alternative means to enable sustainable travel.

Car parking

60. 78 car parking spaces have been proposed. This exceeds even the maximum standards in London Plan Policy T6. Therefore, a reduction in car parking is required alongside controls on parking on street.
61. The ten disabled persons' parking spaces for the residential element, equates to approximately 11% of dwellings. London Plan Policy T6 recommends a minimum of 3% of dwellings having access to a disabled persons' parking, i.e. in this case it should be three. Providing disabled persons' parking above the level in Policy T5 risks their misuse. Assuming there is a reduction in general parking, the seven additional disabled persons' spaces should be repurposed into other uses. Any additional future demand should be met by conversion of general parking. In any circumstance, the disabled persons' parking must be managed to ensure use only by Blue Badge holders and allocated on the basis of need rather than being tied to particular homes (as currently proposed) via a conditioned Parking Design and Management Plan

62. It is understood that there are no car parking spaces proposed for the sports facilities, other than the two disabled persons' parking spaces for public use. This is welcomed, albeit given the unrestricted parking on Worsley Bridge Road and the potential for parking within the development itself, the absence of provision is unlikely to have much if any impact on travel behaviour. Parking on Worsley Bridge Road associated with this development would impact bus operations. In line with London Plan Policy T6.1, at least 20% of spaces should have active electric vehicle charging facilities with passive provision for all remaining spaces. However, officers would encourage that all disabled persons' parking is so equipped from the outset.

Cycle parking

63. 178 long-stay and 6 short-stay cycle parking spaces have been proposed for the residential development, which does meet the numerical minimum standards of London Plan Policy T5. However, to align with policy, at least 54 short-stay cycle parking spaces are required for the sports facility, rather than just the 6 currently proposed. In order to assess compliance with the London Cycle Design Standards (LCDS) also required by London Plan Policy T5, scale plans of the cycle parking provision should be provided.

Travel plan

64. An outline travel plan has been provided, which is welcomed. However, there are no targets to encourage active and sustainable travel in line with the Mayor's Strategic Mode Shift. This should be clarified, and additional measures are also required to facilitate this shift. These should be incorporated into an updated travel plan submitted prior to determination. A full travel plan should be secured through condition in line with London Plan Policy T4.

Trip generation

65. There is a concern that the proposed person trip rates will result in an underestimation of the impact that the proposed development will have on the surrounding transport network. In particular, further work is required to confirm bus trips given that currently only one low frequency single decker serves the site and that there will be demand to travel by bus to the main town centres such as Beckenham with their range of shops and other facilities and higher frequency and more choice of train and tram services. Depending upon the outcome of this further work a contribution towards bus service improvements may be required.

Construction, delivery, and servicing

66. The number of expected delivery and servicing trips to the site has not been provided. This information is required prior to determination of this application and should take into account the increase in online deliveries in recent years.
67. A detailed delivery and servicing plan should be secured through condition, in line with London Plan Policy T7. It is noted that operational parking will be provided for construction workers on-site. In line with London Plan Policy T7

and the Mayor's Zero Carbon London target, more sustainable measures to facilitate construction should be used, e.g. use of cargo bikes and further measures to encourage site operatives to use active travel or public transport to access the site. In line with London Plan Policy T7, further consideration of the times of arrival and departure of construction is required to minimise impact at peak times and when children especially are arriving at or departing from the sports grounds and local schools. A full construction logistics plan is required and should be secured through condition.

Summary

68. Improvements to access arrangements, a reduction in car parking, amendments to cycle parking and further work on the travel plan and trip generation are required. Submission of a detailed construction and delivery and servicing plan is also required.

Sustainable development

Energy strategy

69. General compliance comments: The energy strategy could be compliant with the London Plan energy policies however; the applicant is required to submit the additional information to demonstrate policy compliance which has been requested below. The applicant's response to GLA's energy comments should be provided directly within the Energy Memo provided with this report.

Be Lean – demand reduction

70. The applicant should consider and minimise the estimated energy costs to occupants and outline how it is committed to protecting the consumer from high prices. This should cover the parameters set out in the guidance and include a confirmation of the quality assurance mechanisms that will be considered as part of the strategy.

Overheating

71. The results of the Dynamic Overheating Analysis, using the CIBSE TM59 methodology, demonstrate a g-value of 0.4, balcony shading, curtains, and natural ventilation. The analysis demonstrates that there are a significant number of failures under the DSY 2 and DSY 3 weather files. The applicant should commit to providing guidance to occupants on future minimising future dwelling overheating risk in line with the cooling hierarchy. Further information is also required on the provision of blinds/curtains, window opening and other passive measures to avoid the risk of overheating.

Be Clean – heating infrastructure

72. The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. Evidence of correspondence on connection to a heat network should be submitted. The applicant is proposing block-by-block heat networks

supplied by centralised energy centres. It should be confirmed that all apartments and non-domestic building uses will be connected to the heat networks. The houses will be supplied with individual heating systems due to the lower density, which affects distribution losses and connection costs. This is accepted in this case.

73. The future connection of the site to a district heating network should be appropriately secured.

Be Green – renewable energy

74. The applicant is proposing 120.12 kWp PV. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas.
75. Heat pumps are being proposed in the form of a (centralised) ASHP system for each block and individual ASHPs for houses. Further information on the heat pumps should be provided as set out in the technical memo provided separately.

Whole Life Carbon

76. The applicant has submitted a WLC section under the Whole life carbon assessment and reporting document which appears to cover much of the assessment requirements, however an Excel version to the GLA WLC template must also be submitted to allow a full review to be completed against the guidance. The WLC templates are available at the following link: <https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>
77. The applicant should submit a WLC assessment template in full. This is important to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made. A post construction monitoring report should be secured by condition.

Be Seen – energy monitoring

78. A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This should be secured through the S106 agreement. The 'Be Seen' reporting spreadsheet has been developed to enable development teams to capture all data offline before this is submitted via the webform. The applicant should confirm that the planning stage data has been submitted to GLA.

Circular Economy

79. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects.
80. Therefore, the applicant is required to submit a Circular Economy Statement in accordance with the GLA [guidance](#). A post construction monitoring report must also be secured by condition.

Environmental issues

Urban greening

81. London Plan Policies G1 and G5 embed urban greening as a fundamental aspect of site and building design. Features such as street trees, green roofs, green walls, rain gardens, and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised. The proposals state to successfully meet the 'predominately residential' target score of 0.4 as set out within the London Plan. Further clarification on how this is calculated should be provided with the measured areas overlaid on detailed landscaping plans.

Sustainable drainage and flood risk

82. The applicant has submitted a flood risk assessment (FRA). The development is almost entirely located in a low-risk Flood Zone 1 area, and all properties are located outside of the Flood Zone 2 part of the site. The drainage strategy aims to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy SI 13. The Council should secure the proposed measures by conditions.

Water efficiency

83. The residential components of the development would achieve a water consumption of less than 105l/person/day, in line with Policy SI5 of the London Plan. All proposed measures should be secured by condition.

Digital connectivity

84. Policy SI6 of the London Plan underscores the importance of digital connectivity to London's current and future global competitiveness and expects development plans to deliver full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access. The applicant should therefore ensure that requirements of Policy SI6 are incorporated into the final design of the proposed buildings.

Air quality

85. London Plan Policy SI1 states that, development proposals should include an Air Quality Assessment demonstrating the scheme is Air Quality Neutral and outlining how the scheme will prevent or minimise increased exposure to existing air pollution and address local problems of air quality.
86. The Air Quality Assessment (AQA) inclusive of an Air Quality Neutral Assessment sets out that whilst the development will generate additional traffic on the local road network, it will cause no significant effect on any existing sensitive receptor. The AQA notes the proposed use of air source heat pumps (“ASHP”) which it explains will minimise the development’s impacts and it further sets out recommendations for dust mitigation during construction works. Overall, the development will not have any adverse impacts on air quality during the construction and operational phases provided the suggested mitigation measures are in place, which should be secured by conditions.

Local planning authority’s position

87. 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

88. 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. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission. 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

89. There are no financial considerations at this stage.

Conclusion

90. London Plan policies on land use principles, affordable housing, urban design, sustainable development and environmental issues, and transport are relevant to this application. The application does not fully comply with these policies, as summarised below:

- **Land use principles:** The development is inappropriate development on Metropolitan Open Land. Given the harm that would be caused, the VSC put forward do not justify the proposed development on MOL. The partial loss of the playing fields is not justified, and further information is needed to determine whether the new sports facilities would outweigh this loss. As it currently stands, the proposed development is not acceptable in land use terms.
- **Affordable housing:** The provision of the 52% affordable housing must be quantified by habitable rooms, and a tenure split provided, and a viability assessment must be submitted as the proposal would be inappropriate development on MOL. Early and late stage reviews are required.
- **Urban design:** Further clarification on design including landscaping are required to comply with design policies of the London Plan.
- **Sustainable development and environmental issues:** Further details are required to verify compliance with energy and environmental policies of the London Plan.
- **Transport:** Improvements to access arrangements, a reduction in car parking, amendments to cycle parking and further work on the travel plan and trip generation are required. Submission of a detailed construction and delivery and servicing plan is also required.

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