

<b>Committee Date</b>	10 <sup>th</sup> January 2023	
<b>Address</b>	Clifford House 1 Calverley Close Beckenham BR3 1UH	
<b>Application number</b>	22/03013/FULL1	<b>Officer:</b> Claire Brew
<b>Ward</b>	Beckenham Town and Copers Cope	
<b>Proposal (Summary)</b>	Demolition of existing buildings and phased redevelopment comprising of 275 residential homes in buildings ranging from 3 to 7 storeys. Associated landscaping, car and cycle parking and ancillary development.	
<b>Applicant</b>	<b>Agent</b>	
Bromley Regeneration (Calverley Close) LLP	Miss Nadine James Montagu Evans	
<b>Reason for referral to committee</b>	Major Development 20+ new dwellings, outside of delegated authority	<b>Councillor call in</b>  No

<b>RECOMMENDATION</b>	<b>PERMISSION</b>
-----------------------	-------------------

### Summary

<p><b>Adjacent Archaeological Priority Area (LB Lewisham)</b>  <b>Adjacent Beckenham Place Park Conservation Area (LB Lewisham)</b>  <b>Adjacent Grade II* listed Beckenham Place (LB Lewisham)</b>  <b>Adjacent Metropolitan Open Land (Beckenham Place Park, LB Lewisham)</b>  <b>Adjacent Site of Importance for Nature Conservation (SINC) (Beckenham Place Park, LB Lewisham)</b>  <b>Biggin Hill Safeguarding Area</b>  <b>London City Airport Safeguarding</b>  <b>Smoke Control</b>  <b>Area of Open Space Deficiency</b>  <b>Adjacent Capital Ring and Green Chain Walk</b>  <b>Ground Water Source Protection Zone (Zone II Outer Zone)</b></p>
---

Table 1: Key Designations

<b>Residential Use – See Affordable housing section for full breakdown including habitable rooms</b>			
<b>EXISTING</b>	Vacant/decommissioned	Occupied	<b>TOTAL</b>
Market	-	-	<b>0</b>
Social rented	28	136	<b>164</b>
Social rented Specialist	40	0	<b>40</b>
<b>TOTAL</b>	<b>68</b>	<b>136</b>	<b>204</b>

<b>PROPOSED</b>	Number of bedrooms per unit				
	1	2	3	4 Plus	<b>Total</b>
Market	47	43	6	0	<b>96 (including 10 wheelchair units)</b>
Affordable (Social Rent and London Affordable Rent)	55	69	37	18	<b>179 (including 19 wheelchair units)</b>
<b>Total</b>	102	112	43	18	<b>275</b>

Table 2: Existing and Proposed residential unit mix

<b>Vehicle parking</b>	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	unknown	115	unknown
Disabled car spaces	unknown	9	unknown
Car Club spaces	0	1	+ 1
Cycle	0	508	+ 508

Table 3: Vehicle Parking

<b>Electric vehicle charging spaces</b>	20% active 80% passive
---	---------------------------

Table 4: Electric vehicle charging spaces

<b>Representation summary</b>	<ul style="list-style-type: none"> <li>• A site notice was displayed from 26.08.22</li> <li>• Neighbour letters were initially sent on 24.08.22 to 858 individual addresses in the locality</li> <li>• A press ad was displayed News Shopper on the 31.08.22</li> <li>• Initial consultation is for a minimum of 21 days</li> </ul>
-------------------------------	---

	<ul style="list-style-type: none"> <li>A further round of neighbourhood consultation letters were sent on 6.12.22 (14 day consultation)</li> </ul>
Total number of responses	46
Number in support	4
Number of objections	41
Neutral	1

**Table 5: Representation summary**

<b>Section 106 Heads of Term</b>	<b>Amount</b>	<b>Agreed in Principle</b>
Affordable Housing (Social Rent and London Affordable Rent)	179 units / 18,623m2 floorspace/ 605 Hab rooms	Y
Early-stage viability review triggered if an agreed level of progress on implementation is not made within two years of the permission	-	TBC
Mid-term viability reviews prior to the implementation of phases	-	TBC
Late-stage viability review which is triggered when 75 per cent of the units in a scheme are sold or let	-	TBC
Provision of Wheelchair accessible (SELHP) units	-	Y
Carbon offset contribution	£384,608	Y
Agreement with an accredited car club operator to provide a car, 2 years membership and 20 hours free drive-time for residents	-	TBC
Financial contribution towards a local parking study	£5,000	TBC
Contribution towards pedestrian and cycle surveys to determine the main crossing desire lines which will assist the location of the proposed controlled crossing	£4,000	TBC

Contribution to provide new controlled pedestrian and cycle crossing on Southend Road	£50,000	TBC
Contribution towards provision of cycle facilities between the new controlled crossing and the junction with Park Road/Foxgrove Road which will link with the proposed Bromley South to Sydenham cycle route	£60,000	TBC
Contribution towards signage for Beckenham Junction and New Beckenham stations and other local facilities	£2,000	TBC
Cost of Traffic Management Orders (new and amended)	£4,000	TBC
Agreement to cover TFLs costs for bus cage re-location		TBC
Agreement to cover the Council's costs for the Stopping-up order		TBC
'Be Seen' Energy Monitoring	-	Y
Health infrastructure Contribution	£276,728	TBC
Obligation monitoring fee	£500/HOT	TBC
Agreement to cover all of the Council's Legal costs for preparing the S106	-	TBC
<b>Total</b>	<b>£516,108</b>	TBC

Table 6: S106 Heads of Term

## SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The application involves the demolition of the existing buildings and the comprehensive, phased redevelopment of the estate to provide replacement modern, affordable homes, the net gain of 71 market dwellings and an uplift in affordable housing (when measured by floorspace and habitable rooms), representing a significant contribution to the supply of housing within the Borough

- The proposals respond well to the surrounding context and would not adversely impact on the character or appearance of the area or the visual amenity and character of the adjacent designated MOL
- The development would not give rise to any significant overlooking, loss of privacy or loss of light to occupiers of surrounding residential sites
- The proposed development would not result in unacceptable impacts on highway safety, nor would the residual cumulative impacts on the road network would be severe
- Furthermore, the development would promote sustainable transport modes including walking and cycling, use of ultra- low emission vehicles, car sharing and public transport
- The less than substantial harm to the significance of the designated heritage assets (to which great weight is given) would be clearly outweighed by the public benefits of the development

## 1. LOCATION

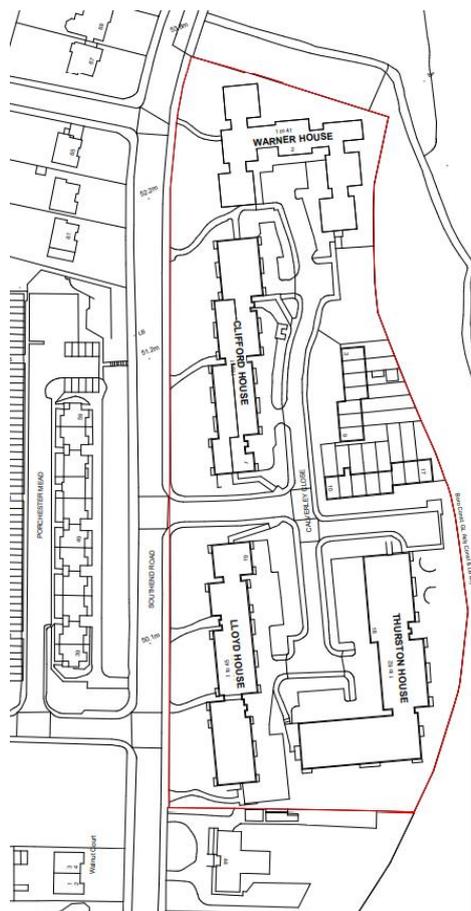


Figure 1: Site Location Plan

- 1.1 The site is located on the eastern side of Southend Lane. The site area is approximately 2.41ha.
- 1.2 There are a total of 204 units existing on the site, delivered across five blocks of accommodation. Warner House (now decommissioned) previously provided 40 units of specialist elderly accommodation.
- 1.3 Calverley Close is currently managed by Riverside. Riverside, who were established nearly 90 years ago, provide affordable housing, care and support services in England and Scotland with almost 56,000 homes in management.
- 1.4 The existing residential density is around 84.6units/ha and comprises a mix of flats and terraced dwellings in buildings of 3-4 storey buildings set around communal parking, amenity spaces and areas of green landscaping located adjacent to Southend Road and adjacent to the boundary with Beckenham Place Park which provide a green buffer.
- 1.5 The site is located directly to the north of Beckenham, between both Beckenham Hill Station and Beckenham Junction Station. The surrounding area is characterised by predominately residential accommodation. The site has a PTAL rating of 2 (on a scale of 0 to 6b where 6b is the most accessible) and is positioned along a main arterial route.
- 1.6 The surrounding area is predominantly residential featuring terraced housing and purpose-built blocks of flats, as well as lower density semi-detached family dwellings, typically ranging from two to four storeys high with the exception of the properties located at Porchester Mead, adjacent to the west of Southend Road, which reach heights of ten storeys.
- 1.7 Commercial uses are located to the north and south of the site towards each of the Stations. The site's setting can therefore be described as a transition between a suburban and urban setting.
- 1.8 Adjoining the site to the east is Beckenham Place Park, within LB Lewisham, which is designated Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation (SINC). Beckenham Place Park is home to Beckenham Place Mansion which is Grade II\* listed. Opposite the site, at numbers 39 to 59a Southend Road, are a group of Locally Listed buildings.



Figure 3: Existing site context (Source: Design & Access statement)

## 2. PROPOSAL

2.1 The proposed development is summarised below:

- Demolition of existing buildings and structures on the site, including all five accommodation blocks
- The redevelopment of the Calverley Close Estate to provide a total of 275 residential homes, including the reprovizion of the existing 179 (of which 136 are currently occupied) affordable residential homes
- The delivery of nine residential blocks ranging between three and seven storeys
- The delivery of 20 three storey town houses within the northern part of the site
- The provision of 125 car parking spaces, including 9 disabled spaces and the delivery of 508 cycle parking spaces
- Alteration to the existing access to the site to provide three vehicular access points from Southend Road
- The creation of new pedestrian accesses from Southend Road into the site
- The delivery of a high-quality landscaping strategy throughout the site, providing both private and communal amenity space in the form of communal courtyards, new green streets and a new parkland corridor with a wildlife edge

2.2 The Planning Statement sets out that comprehensive redevelopment of the site will allow for the following:

- To address current housing needs within the Estate, in terms of overcrowding, to allow residents to still be housed on site instead of relocating (paragraph 7.25);
- Improve accessibility of blocks to allow for step free access and allow for units capable of being adaptable to suit accessibility needs (paragraph 7.25);

- Seeking relevant funding to support redevelopment that has been secured (paragraph 7.27);
- Delivery of 96 market housing units that helps to optimise the site (paragraph 7.28, taking into account short term environmental disbenefits associated with knock down approach);
- Improvement to standard of existing accommodation of affordable housing units (through redevelopment) whilst increasing affordable floorspace (paragraph 7.25);
- Social-rented tenure and right to return secured. Rents to remain at existing levels (paragraph 7.30);
- Environmental benefits (paragraph 7.26);
- Viability tested route followed (paragraph 7.32);
- Single decant for existing residents.

2.3 Further to the initial submission of the application, updated documents were received on 2.12.22. A summary of the main changes and the additional information/clarifications provided is as follows:

- Clarification provided over existing and proposed social rented floorspace figures
- Elevational alterations to include a darker tone of brick on the Southend Road elevation, a lighter tone of brick for the mansion blocks bordering Beckenham Place Park and colour variation has been introduced to define the entrances to create individuality for each block
- Clarification provided with regards to Urban Greening Factor
- Clarification provided with regards to play space
- Improvements to pedestrian facilities at all access/egress junctions
- Response to the GLAs energy comments and a revised roof layout which seeks to maximise the quantum of PV panels on the roofs
- A Tree canopy change assessment has been undertaken which demonstrates that the proposed planting will provide an equivalent canopy area to the trees which are proposed to be removed
- Clarification provided over the location of the wheelchair accessible units
- Response to LB Lewisham conservation comments
- Response to LBB Highways and TFL comments
- Response to LBB Environmental Health officers regarding noise and construction management plan



**Figure 4: Proposed Illustrative Masterplan**

## 2.4 Proposed phasing:

### **Phase 1:**

- Demolish Warner House under extant prior approval demolition consent

### **Phase 2:**

- Construct new townhouses (blocks 1A, 1B and 1D) and create new access road
- Demolish No's 3 – 9 Calverley Close

### **Phase 3:**

- Construct block 2A

### **Phase 4:**

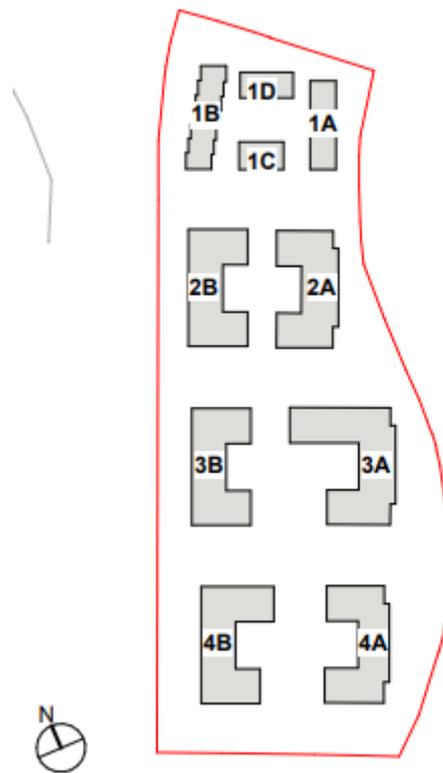
- Demolish Clifford House and construct blocks 2B, 1B and remaining block 1C townhouses
- The remaining homes from Lloyd House and the majority of Thurston House will be provided in 2B and 4no. additional homes in Block 1 will provide accommodation for the remainder of the Calverley houses

**Phase 5:**

- Demolish 10 – 17 Calverley Close
- Construct blocks 3B and 4B
- 3B will provide the remaining homes from Thurston House
- 4B will provide a mixture of private and affordable homes

**Phase 6:**

- Demolish Thurston House
- Construct blocks 3A and 4A
- 3A will provide market sale homes + 1 affordable home at ground floor)
- 4A will provide a mixture of private and the remainder of the affordable (currently vacant) homes



**Figure 5: Key Plan**

**3. RELEVANT PLANNING HISTORY**

- 3.1 EIA Screening opinion (with reference 22/03656/EIA) issued on the 16<sup>th</sup> September 2022 pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 in respect of Demolition of existing buildings

and phased redevelopment comprising of 275 residential homes in buildings ranging from 3 to 7 storeys. Associated landscaping, car and cycle parking and ancillary development – EIA NOT REQUIRED

- 3.2 Application reference 22/03012/DEMCON – Application to determine if prior approval is required for demolition of Warner House, Calverley Close Estate, Beckenham under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) – Prior Approval Required and Granted on 2<sup>nd</sup> September 2022
- 3.3 Application reference 17/04110/EIA – EIA screening opinion request received 6<sup>th</sup> September 2017 in respect of an application for the comprehensive phased redevelopment of the estate to provide approximately 400 residential units - EIA NOT REQUIRED

#### 4. CONSULTATION SUMMARY

##### a) Statutory

- 4.1 **Greater London Authority (GLA) - The application does not yet comply with the London Plan but the possible remedies, as set out in the GLAs full report, could address these deficiencies (a copy of the GLAs full report is attached at Appendix 1)**
- **Land use principles:** The proposal would comply with the Mayor's key principles for estate regeneration set out in the London Plan and GPGER. The uplift in housing is supported and GLA officers could accept the re-provision of the former sheltered accommodation units as regular affordable housing, subject to consideration of the Council's assessment of the rehousing arrangements at Stage II.
  - **Housing:** The application would provide an uplift in affordable housing when measured by floorspace and habitable rooms. The proposal will need to follow the Viability Tested Route and GLA officers are currently scrutinising the information submitted.
  - **Urban design and heritage:** GLA officers are broadly supportive of the design in terms of the built form and residential quality. The applicant should address comments in relation to site layout and public realm, along with comments in relation to fire safety and inclusive design. The development would result in less than substantial harm to heritage assets that would need to be weighed against the public benefits of the proposal.
  - **Transport:** The applicant should address comments in relation to healthy streets, vehicle access, car and cycle parking, transport network impacts and deliveries and servicing. Contributions towards healthy streets and infrastructure improvements along with other key details should be secured.
  - Other issues on **equality, sustainable development and the environment** also require resolution prior to the Mayor's decision making stage

- Thanks for submitting the updated Fire Statement. Nothing further is required in relation to this.
- 4.2 **Historic England – Advised they do not wish to comment on the application**
- 4.3 **Environment Agency – Advised they do not wish to comment on the application**
- 4.4 **Historic England Greater London Archaeological Advisory Service – No objection**
- The proposal is unlikely to have a significant effect on heritage assets of archaeological interest
  - The site is not located in any of the surrounding Archaeology Priority Areas with the closest APA (the Lewes to London roman road and Roman Roadside Settlements) encompassing a buffer zone of a 200m wide corridor which the site is outside of
  - No further assessment or conditions are therefore necessary
- 4.5 **Highways Authority – No objection**
- Car Parking – acceptable
  - Servicing – acceptable
  - Contributions are required toward a parking study in vicinity of the development site
  - Junction geometry improvements should be undertaken
- 4.6 **Transport for London (TfL) (comments received 10.11.22) – amendments / further information is required**
- As highlighted in both the Transport and Urban Design sections of the Stage 1 report, further mitigation is still required to make the private drives pedestrian-friendly and not dominated by surface car parking and movement. This also goes hand in hand with improving the walking experience along Southend Road and making the approaches to/from the private drives safer for pedestrians (e.g. through the provision of raised crossings and ‘give way’ signage for egressing cars etc.) At the moment, the long lines of car parking will result in a subpar walking experience along Southend Road.
  - While a further reduction in car parking is strongly encouraged, if this is not feasible, at a minimum a condition should be secured requiring a robust strategy for reducing car parking on the site over time, commensurate with demand, including plans for its replacement with other uses more in harmony with Healthy Streets (e.g. cycle parking, landscaping etc.). This could start with the “replacement” spaces for the existing estate residents – as these residents move out, the justification for providing their parking space disappears and it should then be repurposed rather than re-provided as general parking. We would expect that to be secured through the Car Park Management Plan.

- In addition to the contribution for a new crossing, a further Healthy Streets S106 contribution should be secured towards improving the walking and cycling experience in the area, particularly along Southend Road between the site and the town centre, in consultation with LB Bromley Highways. The conclusion of the applicant's ATZ is not accepted that there are "no transport concerns" along any of the identified walking routes and there are countless improvements that can be made, including new benches, landscaping, improved pavements etc.
- Best practice is to provide cycle parking within a communal store, including for new houses. That said, the provision of on-plot spaces could be accepted and it is recognised that these may be preferred by residents. However, they must be designed in accordance with the LCDS and should, as provided, be "covered, out of sight and secure". In addition, on-plot cycle parking should still be securely lockable with a rack type that allows for a U-lock for the locking of both the frame and wheel (e.g. Sheffield stand) and should not require manoeuvring through multiple doors or any habitable rooms. On-plot cycle parking spaces should also be excluded from calculations of amenity space and internal storage area.
- While our preference would be to modify the proposed vehicular access so that the existing bus stop and cage does not need to be relocated, the proposed relocation appears generally minor and is likely to have a negligible impact on bus operations. However, TfL Asset Operations will need to confirm the acceptability of the proposed arrangements prior to any works taking place. The replacement of the bus stop and road markings will be at the applicant's expense.

#### 4.7 TFL's Initial comments (received 12/10/22):

##### *Healthy Streets*

- The design should be further refined to ensure appropriate animation and an attractive public realm along Southend Road, including the retention of mature trees and appropriate landscaping interventions to ensure a comfortable streetscape where people will feel safe and comfortable walking.
- The proposed pedestrian connections into the site from Southend Road should also be designed in a manner that provides direct, overlooked, and attractive routes through the site to ensure that they are well-used.
- As there is primary residential access along the proposed internal accesses routes, these should also provide a Healthy Streets environment. Appropriate footway widths, landscaping, and natural surveillance should be provided. As currently proposed, these access routes are dominated by car parking and do not provide a visually attractive environment that encourages safe walking and cycling, contrary to London Plan policy, Vision Zero and Healthy Streets objectives.

- There appears to also be a footpath proposed along the rear (eastern) boundary of the site which provides pedestrian access to a number of elements, including bin stores and some houses. While TfL supports the objective of pedestrian permeability in principle, there are also safety concerns in creating spaces that may be poorly overlooked with low levels of foot traffic. In this case, the adjacency to the park and a heavily treed area exacerbates potential safety concerns.
- It would be advisable to move pedestrian entrances to areas with more footfall and natural surveillance. That said, subject to lighting, landscaping, and overall design, there may be potential to create a space that appropriately mitigates these issues.
- The proposed development will be required to make contributions towards off-site walking and cycling improvements via a S106 legal agreement. This may include new or improved crossings on Southend Road, signage/wayfinding to local rail stations (e.g. Beckenham Hill or Lower Sydenham), or improvements to local pedestrian and cycling routes. These measures will help reinforce the reality of better public transport links than the PTAL rating suggests.

#### *Vehicular Access*

- The proposal replaces one single vehicular access point from Southend Road (Calverley Close) with three separate entrances onto three private roads, all containing surface car parking. This plainly represents a degradation of the quality of the streetscape and worsens the walking and cycling experience along Southend Road by increasing the potential for vehicle and pedestrian/cyclist conflicts, contrary to Healthy Streets principles and Vision Zero objectives.
- The number of accesses combined with the proposed private highway and surface car parking will perpetuate the car dominated environment of the existing estate.
- Ideally, the proposed parking/vehicular access areas should be consolidated, and the overall levels of car parking reduced. However, in the absence of this, significant mitigation measures and robust justification would be required to make this arrangement acceptable from a Healthy Streets perspective. This should include, amongst other things, traffic calming measures with physical infrastructure (e.g. raised pedestrian crossings) at the accesses, wide footways, and appropriate landscaping and street furniture to provide a buffer from traffic. Permeability for pedestrian and cyclists should be retained and enhanced.

#### *Car Parking*

- The proposed development provides a total of 125 car parking spaces and thus accords with London Plan policy. This restraint-based level of car parking is strongly supported.
- The location of the disabled persons spaces should be further refined to ensure proximity to where there is likely to be highest demand or that there

is flexibility in the design and allocation to respond to specific need for such a space.

- It should be made clear how a provision of disabled persons' parking for up to 10% of the total number of units can be accommodated, if demand justifies.
- 20% of car parking spaces will be provided with electric vehicle charging points (EVCP) from the outset, with the remainder having passive provision. This should be secured by condition including a plan which would manage the transition of passive ports to active at no cost to residents. TfL would encourage that, given the low number, all the Blue Badge spaces be provided with active ECVP provision from the outset.
- One car club space is also proposed. The car club space should be appropriately secured alongside arrangements for residents' use of the vehicle.
- A comprehensive Parking Design and Management Plan should also be secured by way of condition.
- If there are any local CPZs or should a future CPZ be established in the area, residents of the proposed development should also be exempt from CPZ parking permits.

#### *Cycle Parking*

- The proposal incorporates a total of 500 long-stay cycle parking spaces within a number of separate cycle store rooms in each residential core and eight short-stay spaces within the public realm. This meets the minimum London Plan quantum of cycle parking. However further work and clarification is required to demonstrate full compliance with LCDS as also required by Policy T5.
- It is unclear how the cycle stores for the townhouses will be accessed without the need to manoeuvre through multiple doors and habitable rooms; TfLs preference would be to provide cycle parking within a communal storage room to maximise floor space and private amenity space rather than on-plot spaces.
- All of the cycle parking for the flatted units is provided within ground floor cycle stores. This maximises convenience and accessibility and is generally supported.
- There are some safety concerns in regard to the cycle stores that are accessed externally only as this could lead to users being followed into cycle stores with no alternative means of exit. It may also make it easier for thieves to break into these rooms. Lobby access should be provided to all cycle stores so that users experience the same level of security as those arriving to the development by any other means.
- The long-stay spaces will consist of 400 two-tier spaces (80%), 75 standard Sheffield stands (15%), and 5% enlarged Sheffield stands, capable of accommodating larger/adapted cycles. This meets the minimum standards typically requested by TfL and is generally in accordance with the LCDS

- Given that two-tier stands pose a potential accessibility issue, TfL would encourage the provision of as much of the long-stay cycle parking as possible in the form of Sheffield stands.
- Visitor cycle parking is identified in the TA as being located within the public realm and distributed across the site. While this is supported in principle, the submitted plans do not clearly show where these spaces will be located.

#### *Transport Network Impacts*

- Taking into consideration the anticipated trip generation, it is considered that these trips would not result in a significant impact on the SRN.
- It is not considered that there would be any significant impact on bus capacity or any resulting peak time crowding.
- One proposed access would appear to be within the bus stop cage on Southend Road. This part of the scheme should be revised to avoid impacting bus services and passengers.
- Improvements should also be secured towards links with the nearest rail stations and subject to discussion with TfL the nearest bus stops which would be used by residents and their visitors.
- A comprehensive Travel Plan should be appropriately secured.

#### *Deliveries and Servicing*

- A full Deliveries & Servicing Plan should be secured by way of a planning condition.

#### *Construction*

- The schedule of works and overview of the types of vehicles serving the construction is welcomed. This should be finalised, and further information provided through the full Construction Logistics Plan.
- A full Construction Logistics Plan (CLP) should be submitted and approved prior to any construction works taking place, including demolition and site clearance.
- . It should demonstrate how the operation of the adjacent bus stop and bus services more generally are not impacted and likewise a pleasant and safe environment for pedestrians and cyclists is maintained.
- If there is any impact on bus operations this must be discussed with TfL prior to any approval. Delivery and waste hours should avoid peak times as well as drop-off/pick-up hours of local schools

#### **4.8 Drainage (Lead Local Flood Authority) – No objection**

- Because the proposed drainage system for the whole site is interlinked, it is important for Phase 1 to be built first
- Drainage condition recommended

#### **4.9 Health and Safety Executive - No objection**

- The fire statement dated 27/07/2022, states the adopted fire safety design standard is BS 9991. HSE has assessed this application on that basis
- Following a review of the information provided in the planning application, HSE is satisfied with the fire safety design to the extent that it affects land use planning
- This response does not provide advice on any of the following:
  - matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application
  - matters related to planning applications around major hazard sites, licensed explosive sites and pipelines
  - applications for hazardous substances consent
  - London Plan policy compliance

## **Other**

### **4.10 LB Lewisham conservation officer – less than substantial harm to heritage assets**

- The conservation impacts here are principally:
  - 1) On the Beckenham Place Park historic landscape - specifically the remnants of the ancient woodland at Stumps Hill Wood on the boundary with the site, and
  - 2) the setting of the grade II\* listed Beckenham Place Mansion.
- The proposed development is both taller than existing (as proposed with blocks 2-4 at 6 storeys and block 1 at 3 storeys), and closer to the site boundary.
- The visible development will change from being set behind the lower parts of the trees and their understoreys, to being visible at upper canopy level and in the gaps between the canopies.
- It will be visible in views from the front of the Mansion, and this will cause a degree of harm to both the listed building's setting, and to the appreciation of this historic stand of trees. This is seen most clearly in views 6 (from in front of the Homestead) and view 7 (from in front of the Mansion) which indicate that that development will be much more prominent. This will cause a degree of harm (at the moderate end of less than substantial in NPPF terms) to the building's setting
- In views from the east of the Mansion, looking back across the parkland towards the Mansion and the stand of trees beyond, I have concerns about the visibility of the development in view 3, where development will be clearly visible behind and between the upper canopies of the trees, changing the setting of the Mansion from being predominantly vegetated, to having fairly prominent built form in relatively close proximity. This will cause a degree of harm (at the moderate end of less than substantial in NPPF terms) to the building's setting.

#### 4.11 **Thames Water – No objection**

- would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
- No objection with regard to waste water network and sewage treatment works infrastructure capacity
- No objection to surface water drainage provided the developer follows the sequential approach to disposal of surface water
- No objection with regard to water network infrastructure capacity

### **Residents/Neighbourhood responses**

#### **OBJECTION**

##### 4.12 *Principle of re-development (addressed in section 6.2)*

- Properties only need updating no demolishing
- We don't want to move, we will be forced out
- Shameful to be knocking down perfectly adequate housing stock and asking its current residents to relocate thereby breaking up a community when local support is more and more important to individuals
- There has been managed neglect of the present estate in order to persuade residents to ballot for redevelopment, hoping that they will be given better homes
- Riverside has been repeatedly asked by residents for costings and proposals for the refurbishment of the estate but this has never been provided
- A lot of public money has already been invested into the estate

##### 4.13 *Deliverability (addressed in paragraphs 6.2.6 – 6.2.11)*

- This building project says (page 27 financial viability report) that it can only be completed (in 10 years) if £18million extra is found before completion so what happens if house prices don't go up by their model's predictions?
- It is very doubtful, given current forecasts, that the completion of these proposals will ever be financially viable, with disastrous effects on current residents, and leading to homelessness and further pressure on Bromley LA

##### 4.14 *Loss of specialist accommodation (addressed in section 6.3)*

- No plans to rebuild over 55's housing but we need this type of housing in this borough
- Warner House should be replaced by social rented retirement dwellings

4.15 Impact on social housing (addressed in paragraphs 6.2.2 – 6.2.11)

- Loss of social housing (loss of 21 homes)
- Can the council guarantee that all the social housing will remain so even when residents leave?
- Housing will not be affordable
- Riverside will eventually be able to acquire all of the site for forms of private marketing, as social renting tenants die, or are forced to move out
- New build homes let to current residents, but vacated in the future will be let as "affordable" not social rent, further eroding Bromleys housing provision capability for the future

4.16 Design and visual impact (addressed in section 6.5)

- A few well placed trees will not soften or reduce the sheer size and height of the development, so close to Southend Road
- Intimidating and overpowering
- A lot higher than other buildings in the locality
- Height of buildings could be higher than some existing trees
- The height of the buildings themselves are over dominant and its location alongside Beckenham Place Park will be an assault on the unspoilt vistas of the green belt and conservation area
- Will be visible from a considerable distance
- The design of the new blocks will be much closer to the main road
- The blocks will be very close which will block light and be a safety issue
- Out of keeping with the area, with Beckenham and the current buildings surrounding Calverley Close
- The positioning of the 7 storey blocks are directly on top of Beckenham Hill, the Porchester Mead blocks are down-hill so are hardly noticeable
- 7 storey blocks on top of a hill will be far more prominent and will change the skyline and views
- Overdevelopment
- The design and materials to be used for the proposed development are not in-keeping with any surrounding structures
- Too close to pavement and lack of open space between buildings and boundary
- 7 storey, red brick blocks with no architectural merit
- Views from Beckenham Place Park will be severely compromised
- The number of flats is excessive for the plot.
- Important that Beckenham retains its suburban, low-rise, green identity
- Why not rebuild to the same scale as current development unless the reason is maximising profit

4.17 Neighbouring Amenity impacts (overlooking, loss of privacy, loss of light) (addressed in section 6.7)

- Overlooking, Impact on outlook and loss of privacy to properties opposite on Southend Road
- Loss of light as a result in the increased height and proximity to Southend Road
- 7 storey buildings will impact both light and view to/of the residents of Palgrave Estate consisting of maisonettes 39/39A, 41/41A, 43/43A, 45/45A, 47/47A, 49/49A, 51/51A, 55/55A, 57/57A, 59/59A and one house at 53 Southend Road and tower blocks Keats House, Byron House and Blake House in Porchester Mead
- There is no obvious reason why the high-rise buildings planned should not be at the rear of the site, where they would be primarily overlooking the Park
- Impact on views of the scenery and Beckenham Place Park
- Detrimental impact on the physical, mental, and social health of the almost everyone in the vicinity

4.18 Amenity impacts arising from the construction (addressed in paragraphs 6.6.36 – 6.6.53)

- Impact on people's lives for the next 10 years i.e. noise ,mess ,dust , congestion and quality of life
- Length of construction could take longer
- Impact on the traffic
- Impacts on people working from home
- Visibility and accessibility will also be compromised for heavy construction vehicles

4.19 Standard of accommodation and outside areas (addressed in section 6.4)

- No gardens, parking or private space for the children to play outside
- The proposed courtyards, green walkways and children's play area are an inadequate size
- the proposed new flats are considerably smaller than the current properties and have no storage space
- they are proposing all internal bathrooms: damp and future mould problems not foreseen
- bedroom windows open onto public walkways next to the front doors
- lack of privacy and the potential for criminal activity is increased on the existing estate
- No one currently on the estate has been told where they will be positioned. This is especially worrying for the elderly and people with disabilities. I would like to know what would happen if the intended

block's' lifts fail and disabled residents aren't able to use stairs and get to their flat? People with disabilities and the elderly have not been thought about at all in the proposed redevelopment

- The location of the blocks being closer to Southend Road than those present will expose residents to greater levels of pollution and noise and have a detrimental effect on physical and mental health
- The communal courtyards, rather than providing 'vibrant social areas for residents with communal seating areas' will act as a magnet for anti-social behaviour and drug and alcohol abuse. The same applies for the parkland corridor.
- The courtyards will take on an oppressive feel, being surrounded by the over height blocks
- Noise and disturbance for tenants whose homes adjacent to the added streets, parking and lighting
- No protection by design from criminal activity i.e Burglary and the same applies for the new flats, none of which have any outside storage facilities
- Passive surveillance will NOT inhibit anti-social behaviour, especially during the hours of darkness
- postboxes located in communal areas are unsafe

#### 4.20 Access, Car Parking, Traffic and Transport (addressed in section 6.6)

- Not enough car parking
- Calverley close currently has parking and secure garages for the whole estate
- The new development has none for the current residents and has only allowed for parking for the flats that will be sold
- No spaces exist for rechargeable cars, disabled the elderly or the workers i.e builder nurses care workers etc. that already live here and need their vehicles for work to pay their rent
- The application states there is facilities for parking in the surrounding roads, but these roads are already busy with parked cars
- Clearly adding more junctions will cause more issues and added dangers to Southend road and its regular users and Emergency services
- Southend Road in the areas where there are no yellow lines, Overbrae, Stumps Hill and Porchester Mead, are already massively overwhelmed with parked cars, particularly at the weekend, during events and generally in the summer, when excessive parking is noted from those using Beckenham Place Park, and on occasions when there is a Cricket Match at the Kent Cricket Ground in Worsley Bridge Road
- Restricting parking on Southend Road will push the problem onto adjoining roads
- There have been occasions when ambulances & a fire engine have had problems getting access due to the amount of cars parked

- Planning around idealistic views to satisfy targets does not reflect reality
- This is not central London, we live in the suburbs, people need cars
- As a minimum, parking needs to be sufficient for the number of properties being proposed
- For motorists exiting the estate from the southern road, vision will be partly obscured by the bus stop and if a bus is present, driver's line of vision will be minimal
- The northern entrance not only includes close proximity to the Southend Road/Braeside junction, it will be located close to the brow of the hill and a bend in the road. With motorist's sight lines restricted, it will render this entrance and surrounding area extremely hazardous for all concerned.
- The 54 bus is rarely punctual, is unreliable and an increase in the local population will impose further strain on this already overcrowded service
- The second route noted, 352, on Worsley Bridge Road is accessed via a steep, unmade road, thereby being inaccessible and unusable for the elderly and disabled
- Public transport is inadequate for the number of people the plans propose to house
- There is one bus service which is already under strain, and all shops, healthcare and rail stations are at least 1km away, with a steep incline to negotiate on both sides of the hill
- The applicant should take [parking] counts on six successive weekends noting the weather
- Parking at Porchester Mead will be used by Calverley Close residents
- The developer should pay for the new roads not the residents of Beckenham and Bromley
- There will never be a reduction in private vehicles on the estate which will mount up year after year
- Increased need for signage in the estate not compatible with the estate being green and pleasant
- The proposed southern access visibility will be totally obscured by busses using the bus stop
- The assertion that the bus stop can be relocated to the north would then have a significant impact on visibility for vehicles leaving the middle entrance
- The assertion that refuse trucks would wait for a vehicle to leave the estate before entering themselves is ludicrous and could be considered dangerous for other road users driving on Southend Rd

- The traffic generation will be increased creating air pollution, thereby affecting health and safety
- No communication from Riverside about how the hazardous materials will be removed safely from the properties
- Some of the flats contain asbestos
- Over a ten year period, most people who are currently living on Calverley will still be on site whilst building is taking place
- The developers assertions that residents should keep their windows closed at night is dismissive.

#### 4.22 Sustainability/Renewable energy (addressed in section 6.9)

- The new estate has zero renewable or sustainable energy
- There are no solar panels, heat pumps or any other kind of renewable energy proposals
- The development demolishes a great number of well-built low rise homes to replace them unsustainably with multi-storey boring developers' designs
- When questioning the choice of construction materials during the meeting I was informed that sustainable timber construction was not possible for the planned designs
- Carbon from the original construction, carbon produced in the demolition of the estate, and further carbon emissions from the construction of the proposed structures etc
- Taking into consideration broader climate change and environmental issues, current guidance is to move away from demolition

#### 4.23 Natural Environment (addressed in section 6.8)

- Concerned that the trees on site will not be preserved and the current mature trees will be impacted
- The height of the proposed buildings will have a great effect on these trees, both on the estate and at the border with Beckenham Place Park
- Loss of open space
- There are badger's setts, in the wooded areas and on the park border with the estate which will be disturbed
- There are regular sightings of badgers and great crested newts in the area between Thurston House and the boundary with Beckenham Place Park, both of which are protected species and any new construction would destroy their habitat
- The many species of wild birds that can currently be found on the estate will be lost too
- There will be a large proportion of trees that require felling for the planned development and with so little green space allocated in the

designs, there is the improbability that there will be a sufficient number of trees being replaced

- Impact on ancient pond in Beckenham Place Park

4.24 Impact on local infrastructure (addressed in paragraphs 6.5.30 – 6.5.37)

- Insufficient schools and doctors
- The increase in population will stretch the already overburdened water system, which is plagued with leaks on a regular basis in the area

4.25 Drainage (addressed in section 6.10)

- Water run-off from the current estate has caused problems in the past
- Impact on not only resident of the estate, but also for housing further down the hill possibly causing issues to foundations and entire buildings.

4.26 Consultation and ballot process (addressed in paragraphs 6.2.28 – 6.2.49)

- Neighbours comments from the online consultation have not been addressed
- Meetings with Riverside have been vague
- Residents have been ignored, designs not thought through and the environmental impact has not been considered
- Inadequate consultation between developers/landlord, residents and neighbours
- There was late and insufficient notification and consultation by ConnectPA and the Calverley Close Development Team on the proposed development
- The letter from Town Planning only arrived a few days ago for our comment when these proposals must have been in the system for years
- Application drawings are difficult to understand
- If you are still considering this application despite the numerous complaints lodged, then please can you organise for a meeting for all the residents (and others who wish to attend) to meet with the developers, Bromley Council and the architects/builders. Please can you arrange for a scale model to be prepared (with surrounding buildings, park etc. to scale) so that everyone can see clearly what this proposed development really looks like and what it will mean
- This needs a proper consultation with the public overseen & attended by the ward or Bromley councillors
- Tenants suspect that the resident ballot was manipulated by Riverside through the giving of dubious information to the 'independent' ballot managers as to who was eligible to vote.

#### 4.27 Other/general comment

- Have lived here for 38 years and enjoy the peace and relatively safety of the estate
- People look out for each other because it's a low rise estate, but once they put in high rise flats that will all stop
- The rebuild of calverley close is for money making purposes only
- Negative impact to our property prices and compensation
- We currently live in well built, secure, low rise homes
- There are no parking issues, lots of open space and criminal activity is incredibly low
- The buildings were only built in the 1970s
- Riverside has mismanaged the estate and have let the estate fall into deliberate decline
- Altering the ratio of adults to children
- Lack faith in Riverside being able to complete the redevelopment and to the standard which has been promised

#### 4.28 **SUPPORT**

- I have been a tenant since 1988 and am looking forward to moving into a brand new flat
- The existing buildings are in a dire state and a complete eyesore to the rest of the surroundings
- There has been numerous complaints raised about leaks and heating system failures but until the blocks are demolished and something more modern and newer put in there place these problems will forever continue
- Although I do myself have some doubts I'm willing to take that chance and allow riverside to try and give new and existing tenants a better more modern (and hopefully not compromising on space/size) home to live in
- The residents of Calverley close voted in favour of regeneration
- The estate in its current condition is not up to today's health and safety standards
- The existing blocks closely resemble that of a prison
- Existing blocks lack ventilation and have for the most part been built as upside down properties where by the bedrooms are downstairs
- Some properties have kitchens with no windows, bathrooms with no windows, and some have balconies and some don't
- I am very much in favour of having a new flat built to modern standards which doesn't look like a prison block
- The new flats will have no impact on the light of the buildings opposite in Porchester mead. Those flats are already in a dark spot sitting slightly below street level.

- Traffic noise is annoying but it's not going to be worse if we have new flats built here
- The estate sits right next to Beckenham place park and has a very dated run down look not in keeping with the surroundings
- No more disruptive than constant roadworks we already have in the area
- As a resident of Porchester mead that sits directly opposite Calverley close the objections are unfounded and ill-informed
- The 3 tower blocks on Porchester mead each have their own parking underneath the buildings
- None of the flats in Porchester mead would lose any natural light
- A new build on the site where Calverley close currently sits would enhance the surroundings
- Calverley close is most visually unappealing set of buildings in the area and anything in place of this eyesore is most welcome

## 5. POLICIES AND GUIDANCE

### Planning and Compulsory Purchase Act (2004)

- 5.1 Section 38(5) states that if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document [to become part of the development plan].
- 5.2 Section 38(6) requires that the determination of these applications must be made in accordance with the plan unless material considerations indicate otherwise.

### National Policy Framework (NPPF) 2021

- 5.3 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For **decision-taking** this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
  - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

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

5.4 In accordance with Paragraph 47 of the Framework, planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

### **National Planning Practice Guidance (NPPG)**

5.5 Relevant paragraphs are referred to in the main assessment

### **The London Plan (March 2021)**

5.6 The relevant policies are:

<b>Chapter 2 Spatial Development Patterns</b>	
Policy SD10	Strategic and local regeneration
<b>Chapter 3 Design</b>	
Policy D1	London's form character and capacity for growth
Policy D2	Infrastructure requirements for sustainable densities
Policy D3	Optimising site capacity through the design-led approach
Policy D4	Delivering good design
Policy D5	Inclusive design
Policy D6	Housing quality and standards
Policy D7	Accessible housing
Policy D8	Public realm
Policy D9	Tall buildings
Policy D11	Safety, security and resilience to emergency
Policy D12	Fire safety
Policy D13	Agent of Change
Policy D14	Noise
<b>Chapter 4 Housing</b>	
Policy H1	Increasing housing supply
Policy H4	Delivering affordable housing
Policy H5	Threshold approach to applications
Policy H6	Affordable housing tenure
Policy H7	Monitoring of affordable housing
Policy H8	Loss of existing housing and estate redevelopment
Policy H10	Housing size mix
<b>Chapter 5 Social Infrastructure</b>	
Policy S4	Play and informal recreation

<b>Chapter 7 Heritage and Culture</b>	
Policy HC1	Heritage conservation and growth
Policy HC3	Strategic and Local Views
Policy HC4	London View Management Framework
<b>Chapter 8 Green Infrastructure and Natural Environment</b>	
Policy G1	Green infrastructure
Policy G4	Open space
Policy G5	Urban greening
Policy G6	Biodiversity and access to nature
Policy G7	Trees and woodlands
Policy G8	Food growing
Policy G9	Geodiversity
<b>Chapter 9 Sustainable Infrastructure</b>	
Policy SI1	Improving air quality
Policy SI2	Minimising greenhouse gas emissions
Policy SI3	Energy infrastructure
Policy SI4	Managing heat risk
Policy SI5	Water infrastructure
Policy SI6	Digital connectivity infrastructure
Policy SI7	Reducing waste and supporting the circular economy
Policy SI8	Waste capacity and net waste self-sufficiency
Policy SI12	Flood risk management
Policy SI13	Sustainable drainage
<b>Chapter 10 Transport</b>	
Policy T1	Strategic approach to transport
Policy T2	Healthy Streets
Policy T3	Transport capacity, connectivity and safeguarding
Policy T4	Assessing and mitigating transport impacts
Policy T5	Cycling
Policy T6	Car parking
Policy T6.1	Residential parking
Policy T7	Deliveries, servicing and construction
Policy T9	Funding transport infrastructure through planning
<b>Chapter 11 Funding the London Plan</b>	
Policy DF1	Delivery of the Plan and Planning Obligations

## Mayor Supplementary Guidance

5.7 The relevant SPGS are:

- *Better Homes for Local People (Feb 2018)*
- *Homes for Londoners - Affordable Housing and Viability (2017)*
- *Housing (March 2016)*

- *Control of Dust and Emissions During Construction and Demolition* (2014)
- *Accessible London: Achieving an Inclusive Environment* (2014)
- *Sustainable Design and Construction* (2014)
- *Shaping Neighbourhoods: Character and Context* (2014)
- *Accessible London: Achieving an Inclusive Environment* (2014)
- *Providing for Children and Young People's Play and Informal Recreation* (2012)

## **Bromley Local Plan 2019**

5.8 The relevant policies are:

- 1 Housing Supply
- Affordable Housing
- Housing Design
- 13 Renewal Areas
- 14 Development Affecting Renewal Areas
- 15 Ravensbourne, Plaistow and Sundridge Renewal Area
- 26 Health and Wellbeing
- 30 Parking
- 31 Relieving congestion
- 32 Road Safety
- 33 Access for all
- 34 Highway Infrastructure Provision
- 37 General Design of Development
- 38 Statutory Listed Buildings
- 39 Locally Listed Buildings
- 42 Development Adjacent to a Conservation Area
- 43 Trees in Conservation Areas
- 47 Tall & Large Buildings
- 48 Skyline
- 53 Land Adjoining Green Belt or Metropolitan Open Land
- 69 Development and Nature Conservation sites
- 70 Wildlife Features
- 72 Protected Species
- 73 Development and Trees
- 74 Conservation and management of Trees and Woodlands
- 77 Landscape Quality and Character
- 78 Green Corridors
- 79 Biodiversity and Access to Nature
- 113 Waste Management in New Development
- 115 Reducing Flood Risk
- 116 Sustainable Urban Drainage Systems
- 117 Water and Wastewater Infrastructure Capacity
- 118 Contaminated Land
- 119 Noise Pollution
- 120 Air Quality

- 122 Light Pollution
- 123 Sustainable Design and Construction
- 124 Carbon reduction, decentralised energy networks and renewable energy
- 125 Delivery and Implementation of the Local Plan

## **Bromley Supplementary Guidance**

5.9 The relevant SPGs are:

- *Affordable Housing (2008)* and subsequent addendums
- *Planning Obligations (2022)*
- *SPG1 General Design Principles*
- *SPG 2 Residential Design Guidance*

## **6. ASSESSMENT**

### **6.1 Housing Need**

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

6.1.2 The site is previously developed land and is a suitable location for optimising housing delivery in line with policy H1 of the London Plan. The Council's latest position in relation to Bromley's Five Year Housing Land Supply (FYHLS) was agreed at Development Control Committee on 2<sup>nd</sup> November 2021. The current position is that the FYHLS (covering the period 2021/22 to 2025/26) is 3,245 units, or 3.99 years supply. This is acknowledged as a significant undersupply and for the purposes of assessing relevant planning applications means that the presumption in favour of sustainable development will apply.

6.1.3 According to paragraph 11(d) of the NPPF in the absence of a 5 year Housing Land Supply the Council should regard the Development Plan Policies for the supply of housing, including Policy 1 Housing Supply of the Bromley Local Plan, as being 'out of date'. For decision taking this means where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission unless:

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

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

6.1.4 This application includes the replacement of affordable homes, an uplift in affordable floorspace and habitable rooms and an overall net gain of 71 dwellings and would represent a significant contribution to the supply of housing within the Borough. This will be considered in the overall planning balance set out in the conclusion of this report, having regard to the presumption in favour of sustainable development.

## **6.2 Principle of Estate Regeneration**

6.2.1 In 2018 the Mayor of London published 'Better Homes for Local People – the Mayor's Good Practice Guide to Estate Regeneration' setting out principles for successful schemes. Some of the key principles of the guidance are, where demolition of existing homes is planned, then the replacement development should provide an increase in affordable housing (or at least be replaced on a like for like basis), full rights to return or remain for social tenants, and a fair deal for leaseholders and freeholders. In addition, where GLA funding is required a residential ballot must take place. Policy H8 of the London Plan is also relevant to these proposals.

### ***Replacement of Affordable Homes - Acceptable***

6.2.2 In accordance with London Plan Policy H8D Demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. In adopting this approach, councils and housing associations may consider altering the mix of homes. For example, if an estate has a high proportion of one-bedroom homes that are being demolished, the landlord may choose to replace some of them with the same or greater floorspace arranged as fewer, family-sized homes. This should be discussed with residents as part of the engagement and consultation process, and landlords should have regard to the impact any changes may have on social tenants who want to return to or remain on the estate.

6.2.3 All development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace (London Plan Policy H8E).

6.2.4 Policy H4 'Delivering affordable housing' of the London Plan sets out measures to help achieve the strategic target of 50% of all new homes to be genuinely affordable applicants. Clause A 2) states that applicants should use grant to increase affordable housing delivery beyond the level that would otherwise be provided. It is noted that

paragraph 7.63 of the Planning Statement makes reference to Policy 2 'Provision of affordable housing' of the Local Plan requiring proposals of 11 units or more to include affordable housing. For clarity, Policy H4 of the London Plan (clause A 1)) is the most recent policy and requires major developments of 10 units or more to include affordable housing.

- 6.2.5 The proposed planning application follows the viability tested route and is accompanied by a Financial Viability Assessment (FVA) dated 13<sup>th</sup> July 2022 and a financial viability update dated 18<sup>th</sup> November 2022 both prepared by Montagu Evans.
- 6.2.6 The FVA concluded that the scheme was technically unviable and therefore unable to deliver additional affordable housing above the 179 Social Rented housing proposed (70% affordable by habitable room). Whilst the number of affordable units on the site is not being increased, there will be an uplift in affordable housing floorspace from 16,783m<sup>2</sup> (including Warner House) to 18,623m<sup>2</sup> (approximately 10%) plus an increase in affordable habitable rooms from 527 to 605 habitable rooms.
- 6.2.7 The updated viability appraisal concludes that the scheme with the inclusion of 179 affordable units (Social Rent and London Affordable Rent) and inclusion of grant funding, results in a negative land value of -£35,465,970, and therefore generates a viability deficit of -£35,465,970 when compared to the adopted Benchmark Land Value of £0.
- 6.2.8 The FVA and FVA update have been independently assessed on behalf of the Council. The applicant has largely addressed the concerns raised by the GLA. Overall, officers agree with the applicant's and the GLA's conclusion that the scheme is highly likely providing the maximum reasonable affordable housing. That said it is still for the applicant and their advisors to demonstrate how this scheme is deliverable noting the substantial deficit.
- 6.2.9 The applicant states that as the scheme and detailed design progresses, they will have more clarity on the market in order to make savings where possible and, as the development will be phased over a 10-year programme, residential values are likely to increase significantly over this period. The applicant has also carried out sensitivity analysis which confirms that the viability of the scheme would improve if construction costs were to go down over the construction period.
- 6.2.10 Any increase (or decrease) in values will be accounted for in the early-stage, mid-term and late-stage viability review mechanisms which are to be secured through S106 legal agreement. These will allow the viability of the scheme to be assessed over the lifetime of the development.

6.2.11 Where the cost of like-for-like replacement would render an estate regeneration scheme financially unviable, the council or housing association should seek gap funding. The Planning Statement makes reference to the fact that GLA funding has been secured for the scheme and is included in the FVA. The GLA have confirmed that the grant commencement deadline is in March 2023.

### ***Housing Mix – Acceptable***

6.2.12 The proposed overall unit mix is included below:

- 102 x 1 bed units (37%) (55 affordable units)
- 112 x 2 bed units (40%) (69 affordable units)
- 43 x 3 bed units (15%) (37 affordable units)
- 16 x 4 bed units (5%) (16 affordable units)
- 2 x 5 bed units (3%) (2 affordable units)

6.2.13 The proposed housing mix was informed by a Housing Need survey carried out between Autumn 2017 and Spring 2021 to understand residents' needs and concerns to inform the design of the redevelopment proposals. The mix of the re-provided 179 affordable homes is derived from the housing needs survey which therefore seeks to ensure that unit mix proposed for the existing residents is reflected of their current and future need. This includes the provision of larger four and five bedroom units and a reduction in 2-bedroom units when compared to the existing unit-mix to address existing overcrowding on the Estate.

6.2.14 Where occupants of existing social-rented units have a right of return, Policy H8 requires that the tenure remains as social-rent. In line with the principles set out in the GPGER, the applicant's submission and offer document identifies that all 136 existing social tenants with a right to return would be offered a new home within the redeveloped estate, retaining the same tenancy rights and paying the same levels of rent with any residents moving into smaller or larger homes charged the existing rent for that sized home.

6.2.15 In accordance with planning policy, the Applicant also proposes to deliver some of the affordable homes at London Affordable Rent levels. This is based on there being a number of unoccupied homes currently on the site and therefore there are no existing tenants in these units which benefit from a right of return.

6.2.16 The affordable units, along with the tenure, mix and the right of return will be secured through S106 legal agreement in perpetuity, meaning that if an existing tenant vacates a property in the future it will continue to be affordable. The applicant's Offer Document also states that all residents will be given the statutory Home Loss Payment to compensate for moving and the applicant would provide all residents a disturbance allowance, which includes moving costs.

6.2.17 The remaining unit mix of the market sale units has been established with due consideration to the nature of the development, the site's location and existing identified housing need within the Borough. The proposed unit mix broadly accords with the housing need set out within the 2014 SHMA, which identified a greater need for predominately smaller units within the Borough.

6.2.18 In addition, the site is located in close proximity to amenities and transport links and as such, in line with London Plan Policy H10, can support a unit mix which is weighted towards smaller units. Notwithstanding this, the inclusion of some family sized units will ensure that a mixed and balanced community is created on the site as required under the London Plan.

6.2.19 The introduction of market units on site helps to optimise the housing overall on site whilst improving the standard of affordable accommodation which is built to modern standards and to a size that meets housing needs of existing residents.

6.2.20 It is considered that the proposal provides an acceptable range of housing unit sizes and an appropriate mix of tenures with the replacement affordable housing and the market units well integrated within the blocks so as to provide mixed and balanced communities. Overall, the proposed unit mix is considered acceptable.

### ***Demolition and full re-development - Acceptable***

6.2.21 Policy H8C of the London Plan states that Before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding. The Mayor's Good Practice Guide also advocates building at higher densities in order to increase the number of affordable homes.

6.2.22 The Planning Statement includes information relating to how the re-use of the existing buildings was considered by the design and applicant team prior to the proposed scheme being progressed (paragraph 7.24 and Design and Access Statement). This included the consideration of 4 options:

1. Do the minimum
2. Functional upgrade
3. Partial development
4. Full redevelopment

- 6.2.23 The benefits of full redevelopment include improvements to the standard of living accommodation, addressing overcrowding issues, improvements to accessibility including provision of step-free access and units capable of being adaptable to suit accessibility needs.
- 6.2.24 Although comprehensive redevelopment has the potential to create the greatest disruption to residents living on the estate and some of the issues identified with the existing estate could be improved through maintenance, refurbishment and partial infill development; when considering cost, efficacy, and longevity of such measures the applicant has established that redevelopment would be the appropriate option to resolve the significant and chronic issues currently present across the estate.
- 6.2.25 GLA officers are of the view that the decision to redevelop the estate is an acceptable approach, however the applicant must continue to address comments in relation to sustainable development, design and transport to maximise the regenerative and environmental benefits of redevelopment. In terms of the social impact of redevelopment, the applicant's commitment to residents to redevelop in the form of a single decant is strongly supported. Appropriate details should also be secured to minimise disruption and impacts to existing and neighbouring residents.
- 6.2.26 The applicant has set out an incremental phased demolition and decant strategy for the site which will re-provide all the existing residents with new homes through single decants. The phasing approach utilises the opportunity to redevelop Warner House in the initial phase to unlock the strategy. The development will be carried out in 6 phases over a period of approximately 10 years. GLA officers are strongly supportive of the single decant approach. Phasing obligations will be secure though a planning condition.
- 6.2.27 The principle of demolition and the opportunity to redevelop the site and replace ageing buildings which currently provide a poor standard of accommodation is acceptable in principle. As discussed below, a ballot has also been carried out with residents voting in favour of the redevelopment.

### ***Consultation Process and residential ballot - Acceptable***

- 6.2.28 When developing estate regeneration proposals council (landlords) and housing associations should always engage openly and meaningfully with those affected by the project from the outset. Residents should be given sufficient opportunity to be involved in shaping any proposals that will affect their homes, and they should be proactively supported to do so throughout the planning and design process.
- 6.2.29 The London Borough of Bromley's Statement of Community Involvement (2016) expects applicants of 'significant' applications to

contact local residents and interest groups informing them of the development proposed; and arrange a public meeting or exhibition at a suitable location in close proximity to the application site in order to allow the proposal to be more fully understood by the local community prior to submission.

6.2.30 Calverley Close is currently managed by Riverside. Since 2016, Riverside have been working with the residents of Calverley Close to bring forward the redevelopment of the Estate, which seeks to improve the quality of homes on the estate. In 2018, Countryside Properties Ltd were appointed as Riverside's development partner to develop plans for the redevelopment of the Site.

6.2.31 The applicant's Planning Statement and their Statement of Community Involvement (SCI) provides details of the residential engagement which has taken place and the key engagement workshops which have been held with residents:

- September 2018 – Residents Workshop;
- July 2019 – Independent Tenant Advisor Appointed;
- September 2019 – Drop in Residents Surgery;
- October 2019 – Resident Engagement Event – Meet the Team
- February 2019 – Residential Engagement Event
- June 2020 - Resident Event – Introduction to Guardians;
- August 2020 – Resident Survey;
- April 2021 – Resident Engagement (Online)

6.2.32 Following engagement with the residents of Calverley Close, an offer document was prepared by Riverside which was prepared in early June (2021):

- June 2021 – Resident Offer Issued;
- June 2021 – Resident Drop in Surgery;

6.2.33 The offer document outlined the proposals for the new Calverley Close Estate which seeks to meet the aspirations of the existing tenants whilst creating an inviting community for new residents. A number of core principles were established within the offer document that have shaped the proposals which are brought forward as part of this application. These are as follows:

- Keeping the existing community together and ensuring they only have to move once
- Helping them through change by compensating them with a home loss and disturbance payment
- Making sure all existing tenants have a new home on the estate which is built to modern standards and to a size that meets housing needs
- Existing tenants keeping the same tenancy rights and paying the same levels of rent
- Every resident will have access to private outdoor space

- Improving security across the estate through design and management; and
- Improved accessibility throughout the Site including the inclusion of lifts within blocks and home layouts on a single level.

6.2.34 Following the production of the offer document the proposals for redevelopment were put to a ballot of residents in July 2021.

- July 2021 – Resident Event, Ballot Opens;
- July 2021 – Resident Drop in Surgery;
- July 2021 – Resident Engagement Event;
- July 2021 – Ballot closes;
- July 2021 – Ballot results are issued;
- Aug 2021 – Ballot result update;

6.2.35 Of the 151 eligible votes, 60% voted in favour of the plans with an 80% turnout. The GLA's Affordable Housing Capital Funding Guide (section eight) sets out further guidance on undertaking residential ballots.

<https://www.london.gov.uk/programmes-strategies/housing-and-land/increasing-housing-supply/affordable-housing-capital-funding-guide>

6.2.36 It says that Investment Partners (Ips) must take reasonable steps to identify those residents eligible to vote, to inform them about the resident ballot and to encourage them to participate in it. A positive ballot is one where there is a simple majority of those eligible residents voting that choose “yes” – that is, in favour of the Landlord Offer to regenerate the estate. There is no minimum threshold for turnout in a ballot.

6.2.37 Where a vote in favour of a new estate regeneration project has occurred, resident consultation and engagement should continue after a ballot has taken place to ensure there is ongoing input from residents into the process (Para 8.2.3, GLAs Affordable Housing Capital Funding Guide).

6.2.38 Since the ballot in July 2021, residents of the Estate have continued to be updated with the progress of the redevelopment of the site. Since October 2021, the applicant has established a dedicated consultation website, they have held an online consultation event and met with stakeholders to discuss the application. An online consultation was held from October 20 to 10 November via the consultation website and this was promoted by a leaflet dropped to 8,000 local residents. An update webinar to display the revised proposals was held on 18 May 2022. A final event for residents was held in June 2022 prior to the submission of the planning application.

6.2.39 The applicant has also engaged with local elected representatives and has extended invitations to meet to neighbouring ward members within LB Lewisham and the Friends of Beckenham Place Park. The

applicant also engaged in pre-application discussions with officers from LB Bromley, LB Lewisham and the GLA between May 2020 and February 2022.

6.2.40 Of the 8,000 addresses posted to, 38 individual residents provided some form of feedback on the proposals over the consultation period:

- 35 respondents provided feedback via the consultation online form
- 3 respondents provided feedback via the consultation e-mail address.

6.2.41 The most frequently raised concern was regarding the proposed height of the buildings. Following the public consultation, the overall height of the blocks across the development were reduced, particularly along Southend Road and nearest to the park boundary. This involved a reduction of two storeys on two on the proposed buildings and one storey on four.

6.2.42 The second most common concern was 'overdevelopment'. The applicant's response is that the reductions in height served to significantly reduce the number of additional homes included in the proposals, reducing the total numbers from 358 to 275.

6.2.43 The next most contentious issue was parking. As the number of private homes has been reduced the number of homes without access to parking has reduced as the affordable homes who require access to parking were identified in the parking needs assessment.

6.2.44 Respondents were concerned that the design did not suit the aesthetics of the area. The applicant has not set any changes to the proposals which came about as a result of this feedback however, they have highlighted their pre-application discussions with the LPA and the Design Review Panel.

6.2.45 Concerns were mentioned regarding traffic, in particular with regard to construction traffic. In response to this a draft CEMP and CLP has been prepared which will assist in mitigating any impacts from construction traffic and address local concerns regarding this. The Applicant has identified separate construction routes so that vehicle movements are self-contained and where they are not Traffic Marshalls will be deployed. In the event that residents make a complaint regarding traffic, a dedicated Community Liaison Manager will be available to discuss their concerns and identify a route to resolving this. A record of any complaint will be kept. There will also be regular newsletters, meet the builder events and tenant engagement meetings to keep residents up to speed with works throughout the course of construction.

6.2.46 Questions were asked about the sustainability interventions included in the proposals. The new homes will be built for the future and energy efficient. The development will use air source heat pumps, an energy

efficient, sustainable heating system that absorbs heat from outside the building. Modern insulation will make the new homes easier to keep warm and reduce the energy needed to heat them. Electric vehicle charging points will be included in the development alongside significant cycle storage to encourage more sustainable modes of transport. The open green spaces will promote biodiversity by including plant species that benefit local wildlife and insects. Sustainable urban drainage will be used on site to ensure that rainwater from the site is directed towards green spaces and green buffers are proposed along the site boundaries to create a separation from the scheme and Beckenham Place Park.

6.2.47 As regeneration plans will usually affect different people in different ways over many years, landlords should complement ballots with other long-term means of engagement (Para 8.2.4, GLAs Affordable Housing Capital Funding Guide). After taking on board the feedback from the public consultation an update leaflet was issued and a further community webinar was held so that the community could view the updated proposals.

6.2.48 The also applicant sets out a commitment to consult residents throughout and beyond the planning process. The project team will provide updates to all those who engaged with the consultation, provided contact details and consented to being contacted. Riverside also remain in communication with residents on the estate, providing regular updates on the course of the application. In addition, two dedicated Riverside Offices are proposed at ground floor of Blocks 3A and 3B. These ancillary office spaces will be used for Riverside Staff and any designated site contractors to work from and will be used when required as meeting spaces for the Riverside Team to meeting with residents of the Estate.

6.2.49 Whist the concerns of local residents are acknowledged, officers are of the view that the consultation carried out prior to the application being submitted complies with the key principles set out in the Council's Statement of Community Involvement. GLA officers also consider that the approach undertaken reflects the key principles set out in the Mayor's Good Practice Guide for early and ongoing consultation.

### **6.3 Loss of Specialist Accommodation at Warner House - Acceptable**

6.3.1 London Plan Policy H13 'Specialist older persons housing' says that Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of local housing needs (noting 210 unit target per annum for Bromley as part of the overall housing target for Bromley); the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport; and the increasing need for accommodation suitable for people with dementia.

6.3.2 Policy 11 of the Bromley Local Plan supports the provision of specialist housing across all tenures, where they are conveniently located for a range of local shops, services and public transport, appropriate to the mobility of the residents, and they provide appropriate parking and suitably landscaped amenity space. Proposals involving the loss of sites currently providing specialist accommodation will be resisted unless:

- a. it can be demonstrated that there is no demand for the existing accommodation and no demand for sites from alternative providers, or
- b. there is equal or greater replacement provision of improved specialist accommodation in an alternative appropriate location.

6.3.3 The applicants have supplied a marketing report (Montagu Evans report in Appendix 2 of the Planning Statement). The report evidences a robust marketing of the site which is considered to adequately address Local Plan Policy 11 a), demonstrating that there is no demand for the existing accommodation and no demand for the site from alternative providers.

6.3.4 Warner House was decommissioned in 2016 following a decision taken in liaison with LB Bromley to decant these properties. As part of the Housing Needs Survey undertaken by Riverside in December 2021 the applicant also looked at whether there was any requirement from existing residents to reprovide specialist Sheltered Accommodation on the site. It was identified as part of this exercise that there were no existing residents on the site who required this service and therefore it was concluded that there is no existing demand for the accommodation.

6.3.5 No residents would be displaced from Warner House as a result of these proposals and policy 11 allows for the loss of such specialist units provided adequate justification is provided, including the undertaking of a robust marketing exercise. Based on the above, there is no demonstrable need for specialist accommodation in this particular location and granting permission for replacement Class C3 housing scheme is considered acceptable in that it would not adversely affect the objectives of the public sector equality duty.

#### **6.4 Housing Quality and Standards**

6.4.1 Bromley Local Plan (2019) policy 4 Housing Design requires all new housing developments will need to achieve a high standard of design and layout whilst enhancing the quality of local places. London Plan policy D6 sets out a number of requirements which housing developments must adhere to in order to ensure a high-quality living environment for future occupants.

##### ***Internal Space standards – Acceptable***

6.4.2 The courtyard blocks benefit from generous size communal entrance lobbies and provide active street frontages. The proposed development

has been designed to ensure that all units achieve the minimum space standards set out within Policy D6 of the London Plan.

### ***Daylight/Sunlight – Acceptable***

6.4.3 The slimline (gallery access) blocks are welcomed and enable the provision of 100% dual aspect homes. With regards to daylight and sunlight for the proposed homes, the daylight results show that a total of 682 (80%) rooms achieve Average Daylight Factor (ADF) levels that are either in line or above the BRE recommendations. In addition to good levels of daylight ingress, good sky visibility can be seen in 685 (80%) of the proposed rooms. Block 4B has the lowest levels out of the all the blocks. The results show that 73% of the habitable rooms meet or exceed the ADF target. In addition, 75% of the room meet or exceed the NSL criteria. The balconies located above the main rooms and the proximity of the block to the adjacent properties reduce the daylight availability of some units, particularly those located on the lower floors. However, the portion of the living area closest to the window achieve adequate daylight conditions. The units are also provided with balconies which provide further access to daylight and sunlight. Overall these results are considered to be good for a scheme of this size and nature.

### ***Privacy - Acceptable***

6.4.4 With regards to privacy and overlooking, overall, there is substantial separation between the blocks (between 22m and 24m) so as to reduce any potential overlooking between proposed habitable room windows or balconies. There is only around 15m separation between the northernmost parts of blocks 3A and 3B; however it is noted that there are no primary habitable room windows or balconies/terraces positioned on the eastern side of 3B, there are only secondary windows living/kitchen/dining rooms. Accordingly, there would be no mutual overlooking or privacy impacts as these secondary windows could be obscure glazed. This would need to be the subject of a planning condition.

### ***Noise, Ventilation and Overheating - Acceptable***

6.4.5 Local Plan policy 119 states that new noise sensitive development should be located away from existing noise emitting uses unless it can be demonstrated that satisfactory living and working standards can be achieved and that there will be no adverse impacts on the continued operation of the existing use.

6.4.6 The design and layout of new development should ensure that noise sensitive areas and rooms are located away from parts of the site most exposed to noise wherever practicable. External amenity areas should incorporate acoustic mitigation measures such as barriers and sound

absorption where this is necessary and will assist in achieving a reasonable external noise environment.

- 6.4.7 London Plan Policy SI4 sets out expectations for developments to minimise adverse impacts on the urban heat island, reduce internal overheating and reduce the need for air conditioning through their design, layout, orientation, materials and the use of green infrastructure. Major developments should include information in their energy strategy as to how they propose to meet policy requirements in accordance with the cooling hierarchy in Policy SI 4.
- 6.4.8 Concerns have been raised from residents with regards to noise and disturbance for tenants whose homes adjacent to the added streets, parking and lighting. However, the drawings show that, at ground floor level, there are no apartments with their bedroom windows adjacent to the communal paths, car parks or access roads. Adjacent to these areas will be kitchens, WC's and utility rooms. Plant, cycle stores and refuse stores are also located at ground floor level adjoining these more heavily trafficked parts of the site. The applicant's lighting report has confirmed that lighting limits will be met at the residential windows within the development as well as outside, where lighting falls well below the guidance levels.
- 6.4.9 The concerns received from residents that bedroom windows will open onto public walkways next to the front doors are also noted. At first floor these would be lightly trafficked given that the decks provide access for only a limited number of units within each core per floor. At upper floor level the number of bedrooms fronting the decks and the number of units accessed from them varies between blocks. However, movement in these areas would be limited to residents of the blocks and, as such, the impact on amenity in terms of noise and disturbance would be minimal. Gallery access also facilitates greater social interaction between residents – a positive benefit of communal living.
- 6.4.10 There is potential for significant levels of noise from road traffic on Southend Road for those windows on the western façade of the development. The Council's Environmental Health officer has raised concerns that the noise measurement period carried out as part of the applicant's Environmental Noise Assessment is not representative of the baseline noise environment. Only short-term measurements were taken where hourly measurements throughout the day were alternated between the three different locations. Furthermore, the measurement only consisted of 30 minutes during the night-time period. Although the report has stated that this was during the noisiest period, the short time period cannot be considered sufficient in providing confidence in the robustness of the data. This is particularly the case in considering the LA max levels over the night-time period.
- 6.4.11 It was also noted that traffic patterns were potentially still affected by COVID and that according to the Extrium mapping, average daytime

noise levels at the Southend Road frontage of the site could potentially reach the 65 to 75 dB (LAeq, 16hr) depending how set back the structures are from the road.

- 6.4.12 The Environmental Health officer states that long term monitoring is required to establish the glazing and ventilation requirements within the development and to provide an appropriate fixed plant noise limit. The sound reduction properties of the glazing and the ventilation (which hasn't been considered in the report), along with the details of the balconies acoustic design and the location. Furthermore, the noise report has not considered the impact of plant on-site and mitigation for all fixed plant will also need to be submitted based on the further monitoring required. The lowest LA90 over the night has also not been established.
- 6.4.13 The applicant responded on 2.12.22 noting that there were no secure locations to leave equipment for long-term monitoring at the site. As a result, they carried out attended monitored towards the end of the night-time period as road traffic builds towards the morning traffic peak. From the attended monitoring it was apparent that the dominant source of noise at the site was from road traffic. It is therefore reasonable to expect that LAeq noise levels measured by the survey at the end of the night-time period would be precautionary as noise levels during the remainder of the night-time would be considerably lower due to lighter traffic flow. Noise maxima at the site during the night-time are also expected to be vehicle related and, as such, the applicant considers that their monitoring, whilst limited in duration, would be capable of detecting typical traffic-related noise maxima.
- 6.4.14 To ensure that internal noise criteria are met on the western facades, acoustic glazing providing between 32 dB and 34 dB attenuation is required on western facades to ensure that BS8233 noise criteria are met internally in bedrooms. However, for those units most affected by noise (particularly 6 bedroom windows affected) the applicant is proposing a 'closed window' solution and mechanical ventilation of 4 air changes per hour in the form of a Mechanical Ventilation with Heat Recovery (MVHR) system, including purge ventilation in any rooms which have acoustic concerns. MVHR is a continuous source of ventilation that extracts stale, moisture-laden air from a building and resupplies fresh, filtered air back in in order to ventilate rooms and prevent overheating.
- 6.4.15 The results of the Dynamic Overheating Analysis, using the CIBSE TM59 methodology, demonstrate that all units comply with DSY1 assuming a g-value of 0.4 and openable windows. In addition, the applicant is also proposing the use of internal blinds and guidance will be provided to occupants on minimising dwelling overheating risk in line with the cooling hierarchy in the London Plan. The GLA have welcomed the installation of internal blinds in the base build, however further information is required to demonstrate that the MVHR unit

presented can achieve the 4 air changes per hour specified. This can be conditioned.

- 6.4.16 The NPPG (Para 006 Reference ID: 30-006-20190722) says that when considering noise (particularly night time noise) relevant factors to consider are whether any adverse internal effects can be completely removed by closing windows and, in the case of new residential development, if the proposed mitigation relies on windows being kept closed most of the time (and the effect this may have on living conditions). In both cases a suitable alternative means of ventilation is likely to be necessary. Further information on ventilation can be found in the Building Regulations.
- 6.4.17 The proposed development of the site will relocate sensitive residential receptors, already impacted by noise from the existing road network, closer to the primary noise source. While the use of mechanical ventilation is not ideal and, instead, passive measures should be prioritised at the early stages of the design process (informing building layout and facade designs), it is recognised that this is a previously developed site, and that Southend Road is characterised by residential development. In this instance, mitigation as set out above by means of 'closed window' solutions and upgraded glazing on the western periphery of the site will achieve the requirements of the NPPF and will allow benchmark standards to be met. Furthermore, as all of the proposed homes would be dual-aspect residents will have access to a relatively quieter façade as part of their dwelling.
- 6.4.18 Full details of a suitable scheme of noise mitigation, together with details of the MVHR system should be secured by planning conditions. Before any mechanical plant is used on the premises a scheme of noise mitigation will also need to be submitted to and approved by the LPA, in order to minimise transmission of structure borne sound or vibration to any other part of the building.

***Private outdoor space - Acceptable***

- 6.4.19 All of the new residential units proposed within the scheme will have dedicated private amenity space. This will be brought forward through either gardens within the proposed houses or balconies within the flatted accommodation blocks. The townhouses will be provided with outside terraces accessed from the rear of the properties which will measure a minimum of 2.8m in depth. For the flats, the terraces and balconies would achieve a minimum depth and width of 1.5m which accords with policy D6 of the London Plan.
- 6.4.20 Due consideration has been given to the treatment of public and private space thresholds regarding the requirement for defensible space separating the private outdoor spaces at ground floor from pedestrian access routes into the dwellings. They will be provided with

various boundary treatments including walls and railings measuring no less than 1.5m in height, or hedges.

- 6.4.21 Where external amenity spaces are an intrinsic part of the overall design, the acoustic environment of those spaces should be considered so that they can be enjoyed as intended. Due to the elevated road traffic noise from the west of the development site, the applicant's Noise Assessment considers it is likely that balconies on the western façades of Blocks fronting Southend Road would expose occupants to environmental noise in excess of guideline levels and balcony spaces on this façade would not provide occupants with acoustically suitable spaces for relaxation.
- 6.4.22 In light of this, it is recommended that the design of balconies on these noisier facades will incorporate a solid balcony screen of sufficient height to break the line of sight of a seated balcony occupant to the road together with suitable acoustically treated lining to the balcony. The optimum height of the solid panel however is still to be determined following further detailed design. This should be the subject of a planning condition on any permission granted.
- 6.4.23 Noise levels in balconies on all other facades will benefit from screening from road noise provided by the new structures and from a degree of distance attenuation. Residents of the development will also be able to access a relatively quiet, protected, nearby external amenity space in the form of the proposed courtyards and outdoor amenity spaces, as well as being able to access Beckenham Place Park within a 5 minute walking distance.
- 6.4.24 The application is also accompanied by a Wind Microclimate Assessment (May 2022) which concludes that parts of a few private terrace spaces (at the corners of Block 2B) have potential to be windier than ideal, but these terraces are expected to be considered at least tolerable for proposed uses. Block 2B's western terraces may benefit from perimeter hedging, as per the other blocks, but this would represent an enhancement rather than a mitigation requirement.
- 6.4.25 Overall, the development would result in high quality, dual aspect homes with good daylight and sunlight provision and access to high quality external amenity spaces. The use of planning conditions will enhance the quality of the development and enable it to proceed by mitigating the adverse effects of road traffic noise to provide a good standard of accommodation for future occupiers.

***Communal outdoor space and Play space - Acceptable***

- 6.4.26 Whilst providing some positive visual links through the site, with the exception of some private gardens, none of the green spaces on the existing site are defined amenity areas for residents or playspace for children. The proposed scheme will deliver 500 sqm of publicly

accessible communal amenity space throughout the development. The communal amenity will be delivered in the form of communal courtyards, which provides green open space for new community relationships to foster and parkland corridors along the northern and eastern boundary of the site which provides green and ecologically focused environments.

- 6.4.27 Concerns have been raised by residents with regards to insufficient play space being provided and the quality and useability of these spaces, in terms of daylight/sunlight, anti-social behaviour and crime.
- 6.4.28 London Plan Policy S4 Play and informal recreation, sets requirements for play space, notably clause B requires at least 10 square metres of play space provided per child, that provides a stimulating environment, can be accessed safely, is integral to the surrounding neighbourhood, incorporates trees and/or other forms of greenery, is overlooked to enable passive surveillance, is not segregated by tenure.
- 6.4.29 The proposed units create a child yield of 211.5 children and therefore a minimum requirement for 2115 sqm of play space. The application design and access statement illustrates 2,204 sqm of play space, thereby exceeding the minimum requirements.
- 6.4.30 The application drawings and Design and Access statement demonstrate that it will be well located throughout the development with passive surveillance from the residential development (kitchen windows etc) whilst being sensitively located in relation to the proposed units, for example making use of areas adjacent to the energy centre and with units adjacent to the play areas having bedrooms at first floor level (sections 6.4 and 7.7).
- 6.4.31 The proposal is acceptable in that it would meet the play space needs of children and youths across the estate. A condition is recommended which should ensure that further details of the play equipment are provided and make provision for ongoing maintenance. The success of the 12+ play areas in particular will be determined by the detailed design and the relationship between activity areas, the pedestrian perimeter route, and the parkland corridor. Subject to the above, the granting of planning permission would not adversely affect the objectives of the public sector equality duty in relation to young people.
- 6.4.32 With regard to the quality and useability of the outside spaces more generally, the applicant's daylight and sunlight assessment confirms that the courtyard amenity space to the north serving Blocks 2A and 2B falls below BRE recommendations during winter months. Officers consider that a reduction in the height of Block 2A fronting the park may improve the results of the sunlight study. In response, the applicant states that Block 2A is an affordable housing block and to ensure a single decant is achieved on the site, any reduction in the height of Block 2A would result in an insufficient quantum of re-

provided accommodation for existing residents. As such, to support a single decant across the site and to ensure the re-provided accommodation meets the needs of existing residents the applicant asserts that the massing of Block 2A is unable to be reduced.

6.4.33 In terms of the social impact of redevelopment, it is noted that the GLA are strongly supportive of the single decant. It is also noted that the identified failure with regards to sunlight within the specific courtyard amenity space is only experienced during the winter months. As set out within the submission, this area will achieve the required 2 hours of sun on the ground for at least 50% of sun between April to the end of August and will achieve required sun hours during summertime (21st June). It should also be noted that there are a number of alternative amenity spaces within the development which achieve the required levels of sunlight during these winter months. These are available to all residents as alternative amenity space areas. As such, residents of these blocks will still be able to experience high quality amenity provision throughout the site.

6.4.34 With regard to crime and anti-social behaviour, by setting the blocks away from the park edge a secondary pedestrian perimeter loop incorporating play spaces within the parkland corridor has been created, resulting in more vibrant, attractive spaces with natural surveillance, thereby reducing the potential for anti-social behaviour. The new design will also include passive surveillance to parking bays and external communal areas and the applicant has confirmed that the new estate will meet Secured by Design standards. A planning condition is recommended to secure the details of how this will be met, including details of lighting and door entry systems with controlled access.

6.4.35 According to the Wind Microclimate Assessment, communal amenity spaces are expected to enjoy suitable conditions for recreational activities including at least short periods of sitting or standing. These conditions would be considered suitable for uses such as play spaces for example. Most of the courtyard spaces are expected to be further suitable for long periods of outdoor sitting, such as for picnics for example, during at least summer. This mix of conditions would usually be considered an appropriate target for large amenity spaces, and conditions are expected to be considered acceptable.

6.4.36 Overall, the creation of a series of communal spaces, linked via a level access footway where residents can meet and socialise with others and where children have access to a range of play spaces, is strongly supported by officers and, when considering the public sector equality duty, no protected groups would be disadvantaged by these proposals. These benefits, when weighed against the minor reduction in daylight/sunlight to the northern courtyard during the winter months, are considered to outweigh any harm.



Artists impression of communal courtyards (Source: Design and Access Statement)

### ***Accessible and Adaptable Homes - Acceptable***

6.4.37 In accordance with Policy 4 of the Local Plan and policy D7 of the London Plan at least 10 per cent of dwellings are required to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. All other dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

6.4.38 All external approaches to residential entrances have been designed to be step-free, providing level access for residents and visitors and a total of 29 wheelchair accessible units M4(3) Building Regulation will be provided throughout the Site. This exceeds the policy requirement for 10% of units (27 units) to be wheelchair accessible M4(3) Building Regulations.

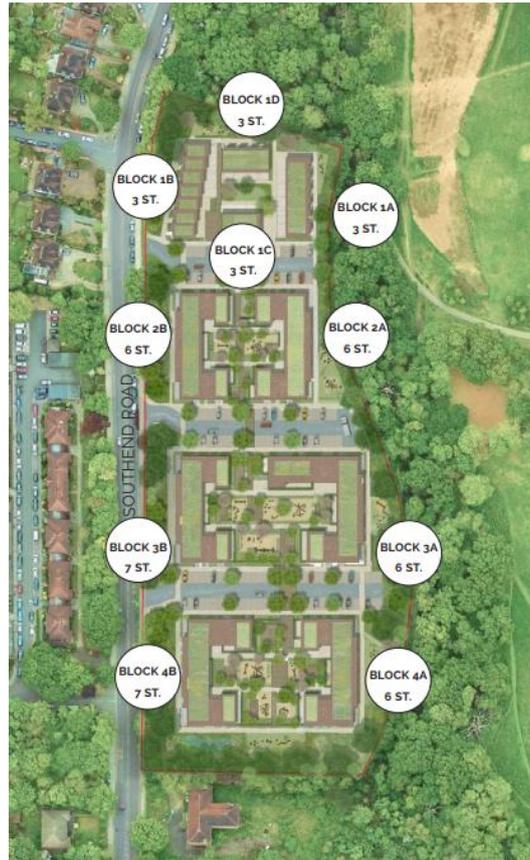
6.4.39 Of the 29 wheelchair units provided, 19 will be affordable consisting of one and three bedroom units. For the affordable wheelchair units, which will need to meet M4(3)(2)(b) and SELHP standards, these will be provided on the first, second, third and fourth floors and distributed between blocks 2A, 2B, 3B, 4A and 4B. The remainder of the units will meet M4(2) Building Regulations.

6.4.40 Officers are supportive of the amount and distribution of the wheelchair accessible units, which the Council will have nomination rights over, with the habitable rooms and overall size of these units being above the recommended sizes. The M4(3)(2)(b)/SELHP units and the M4(2) units will be secured through planning obligations and conditioned as appropriate.

6.4.41 A response to the Council's Occupational Health officer was also provided though it is noted that a number of these comments relate to the detailed design which will be progressed once planning permission is secured and will be controlled via planning condition/obligation.

## **6.5 Design and Density**

- 6.5.1 Policy D3 of the London Plan requires all development proposals to follow a design-led approach, making the best use of land to optimise the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.
- 6.5.2 The proposals will increase the residential density of the site from approximately 84.6 units per hectare to approximately 114 units per hectare (356 habitable rooms per hectare). However, it is relevant to highlight that the 2021 London Plan moves away from the adoption of a more prescriptive formulaic approach when determining an acceptable density on a site. Instead, it seeks to ensure that developments make the most efficient use of land, with a focus on locating high density development within sustainable locations such as opportunity areas and town centres, that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling (Part B of policy D3). Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate.
- 6.5.3 The application site is not in a town centre or an opportunity area. It is important that new development makes a positive contribution to the setting and has an appropriate relationship with the surrounding context. The site is in a transitional position between lower density suburban housing to the north and west (with the exception of Porchester Mead) and higher density flatted development to the south/south-west. Despite the low PTAL of the site, there are range of viable transport options available to residents.
- 6.5.4 The Mayor's Good Practice Guide to Estate Regeneration also advocates increasing the number of affordable homes as part of an estate regeneration scheme by building at higher densities wherever possible. Options for doing so should be discussed with residents as part of the consultation process. Increasing the density of an estate may improve the viability of a scheme and help to maximise the number of genuinely affordable homes.
- 6.5.5 An increase in residential density at this site is therefore acceptable in principle, in line with Policy D3, subject to any potential harm which may result from building at the increased density proposed. This is given further consideration, below.
- 6.5.6 The application proposes nine residential blocks ranging between three and seven storeys and the delivery of 20 x three storey town houses within the northern part of the site.



6.5.7 Policy 47 (Tall and large buildings) of the LBB Local Plan states that proposals for tall and large buildings will be required to make a positive contribution to the townscape ensuring that their massing, scale and layout enhances the character of the surrounding area. Tall and large buildings will need to be of the highest architectural design quality and materials. The Policy further states that tall buildings should be reflective of their local and historic context, including strategic views. Proposals for tall buildings will be required to follow the current Historic England Guidance.

6.5.8 Furthermore, policy 48 (Skylines) states that the Council will require developments which may impact on the skyline to demonstrate how they protect or enhance the quality of views, vistas, gaps and skyline listed in the supportive text.

6.5.9 Policy D9 of the London Plan is more up-to-date than policy 47 of the Local Plan and is clear that tall buildings should only be developed in locations that are identified as suitable in Development Plans. A tall building is defined as no less than 6 storey or 18 metres measured from ground to the floor level of the uppermost storey. In accordance with Policy D9, development proposals which propose tall buildings should address the follow impacts which are considered in turn in the following paragraphs of the report:

- Visual Impacts
- Functional Impacts

- Environmental Impacts and
- Cumulative Impacts

**Visual impacts and Heritage Impacts – *Less than substantial harm***



**Proposed East Elevation**



**Proposed West Elevation**

6.5.10 Proposals are also required to take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

6.5.11 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.

6.5.12 Policy 42 of the Local Plan states that a development proposal adjacent to a conservation area will be expected to preserve or enhance its setting and not detract from views into or out of the area. Beckenham Place Park which adjoins the site to the east is a designated conservation area and contains the Grade II\* listed Beckenham Place Mansion.

6.5.13 To the west of the site on Southend Road are a group of small-scale 1930s Locally Listed buildings (non-designated heritage assets).

6.5.14 Beckenham Place Park is also designated Metropolitan Open Land (MOL). Proposals for development on land abutting MOL should ensure that they have no detrimental effect on the visual amenity, character or nature conservation value of the adjacent designated area (Local Plan Policy 53).

- 6.5.15 The application is accompanied by a detailed assessment of the visual impact of the proposal, which is contained within the Townscape, Visual, (Built) Heritage Impact Assessment (TVBHIA), prepared by Montagu Evans.
- 6.5.16 The current relationship that Calverley Close has with Southend Rd and those heritage assets to the west is a visually subservient and very delicate relationship. Although of no architectural or historic interest, the current modern buildings that make up Calverley Close are between three and four storeys.
- 6.5.17 The proposed buildings would be a lot larger and more dominant, monolithic blocks which, according to LB Bromley's conservation officer, do not maintain the same delicate relationship with the existing heritage assets and would result in less than substantial harm to their significance.
- 6.5.18 Whilst there would be a notable step change in scale/height of the blocks fronting Southend Road, particularly to the south, the impact would be mitigated in part by their siting (set back behind the existing green buffer/mature tree canopy) and design (architectural approach) and officers are of the view that the scale of harm would be minor. The proposal provides a variation in the height of the blocks fronting Southend Road and the overall skyline and the reduction in scale to the north in the form of 3 storey townhouses responds appropriately to the low-rise surrounding context to the north of the site. The siting of the taller 7 storey blocks to the south and the reduction in the height of the park facing blocks (from earlier iterations) ensures a gradual transition in scale between the existing 10 storey towers to the west (Porchester Mead) and the open park setting to the east, helping to minimise any impact on the visual amenity and character of the adjacent designated MOL. The building heights also respond well to the sloping north-south topography of the site.
- 6.5.19 The TVBHIA concludes that overall there would be some beneficial improvements to the townscape in a number of views (12, 13, 14 and 15) within and the proposed development would have an either neutral (view 3) or negligible impact in all other views.
- 6.5.20 LB Lewisham's conservation officer has raised concerns that the development will be visible in views out of the adjacent conservation area and from the front of the Mansion, and this will cause a degree of harm to both the listed building's setting, and to the appreciation of this historic stand of trees. This is seen most clearly in views 6 (from in front of the Homestead) and view 7 (from in front of the Mansion) of the TVBHIA which indicate that that development will be much more prominent.



**View 6: Beckenham Place Park (near stables) as Existing (Source: Heritage, Townscape and Visual Impact Assessment)**



**View 6: Beckenham Place Park (near stables) as Proposed (Source: Heritage, Townscape and Visual Impact Assessment)**



**View 7: Beckenham Place Park (north of mansion) as Existing (Source: Heritage, Townscape and Visual Impact Assessment)**



**View 7: Beckenham Place Park (north of mansion) as Proposed (Source: Heritage, Townscape and Visual Impact Assessment)**

6.5.21 View 3 of the TVBHIA also depicts that the development would be clearly visible behind and between the upper canopies of the trees, changing the setting of the Mansion from being predominantly vegetated, to having fairly prominent built form in relatively close proximity. LB Lewisham's conservation officer considers that all of this will cause a degree of harm (at the moderate end of less than substantial in NPPF terms) to the listed building's setting.



**View 3: Beckenham Place Park (South East) as Existing (Source: Heritage, Townscape and Visual Impact Assessment)**



**View 3: Beckenham Place Park (South East) as Proposed (Source: Heritage, Townscape and Visual Impact Assessment)**

6.5.22 The NPPF makes clear that any harm to a designated heritage asset requires clear and compelling justification. *“Where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”* (Para.202).

6.5.23 In response to the conservation officer’s concerns the applicant has reaffirmed that the relationship between the proposed development and park boundary has directly informed the design process, as demonstrated by the design evolution outlined in the Design and Access Statement prepared by HTA. This includes the setting down of the blocks on the eastern side of the site to 6 storeys (3 storeys for the townhouses).

6.5.24 Views 3-7 within the TVBHIA show that the height of the blocks would not exceed the height of the trees screening the eastern/northern boundaries of Beckenham Place Park and the proposed development would not feature prominently in views of the mansion from its west or south. Furthermore, the visual impact would be seasonal and no trees in the park would be impacted by the development. Instead, the proposed development provides further planting to reinforce the boundary.

6.5.25 Notwithstanding the above, the less than substantial harm to the significance of the designated heritage assets which has been identified will need to be weighed against the public benefits of the proposal in the conclusions section of this report.

***Impact on protected landmark – Acceptable***

6.5.26 Crystal Palace Park is approximately 3750m from the application site and there is potential for the development to impact on views of the mast BBC TV mast which is a protected landmark under policy 48 of the Bromley Local Plan. The applicant has included a view from the upper terrace of CPP within their TVBHIA. The Proposed Development is shown in render in this view and is to the right of the Lodge, in the centre left of the view. It does not break the ridgeline of the hills beyond, nestling in amongst the existing development and is barely discernible. It is concluded that the Proposed Development would give rise to a 'Negligible Likely effect' with the overall scale of Effect being negligible and the effect therefore would be neutral.

***Fire Safety - Acceptable***

6.5.27 The application comprises one or more relevant buildings which meet the height condition (18m or more in height, or 7 or more storeys whichever is reached first). In accordance with the Planning Gateway One regulations the Health and Safety Executive (HSE) has been consulted on the application.

6.5.28 The application is accompanied by a Fire Statement (in accordance with London Plan policy D12) providing details of the proposed emergency routes and how the building has been designed to comply with fire requirements. The HSE are satisfied with the information provided in the application (including the fire statement).

6.5.29 Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Fire Safety and Secured by Design conditions are recommended on any subsequent grant of permission.

***Functional / Infrastructure Impacts - Acceptable***

6.5.30 The application is also accompanied by a Transport Assessment which concludes that there is sufficient capacity for the transport network to accommodate the quantum of development. This is discussed in more detail in the Highways section of this report.

6.5.31 Whilst the impact of development proposals on local infrastructure and services is not specifically referred to in policy D9, this is an important consideration where proposals which are increasing residential density of a site. The concerns raised by residents in respect of a lack of schools and doctors to support the new residential population as well as the increased burden on water infrastructure are also noted.

6.5.32 The development would result in a net gain of 71 new homes and would be liable for the payment of the Bromley Local Community

Infrastructure Levy (CIL) which is invested into infrastructure projects that are required to facilitate and accommodate development in the borough and deliver the adopted Local Plan. Being a predominantly affordable housing re-development, the scheme would be eligible for some Social Housing Relief.

6.5.33 The NHS London Healthy Urban Development unit have assessed the proposed development against the likely impact on health infrastructure. They have taken a cautious approach using a net population gain approach assuming that a proportion of residents will move within the area. This approach calculates the net increase as 138 residents for the 96 units and a total capital cost for mitigation of £293,611.

6.5.34 It is anticipated that the increased capacity could be provided through reconfiguration and conversion of existing space and upgrading to clinical standards and therefore have assumed a reduced figure of £190,847.15. This is 65% of the original HUDU Model figure. If the currently vacant units are included in the calculations, in addition to the 96 units, assuming a 45% increase in residents the cost of mitigation would be **£276,728**.

6.5.35 The intention would be to provide the increased capacity alongside the arrival of the new population and therefore the contribution should be secured within the S106 legal agreement.

6.5.36 With regard to education infrastructure, no site-specific impacts have been identified which would warrant a specific S106 contribution and CIL will continue to be applied.

6.5.37 In terms of water demand Thames Water have raised no objection with regard to water network infrastructure capacity. A planning condition is recommended limiting the use of mains water in line with the operational Requirement of Building Regulations, in accordance with policy SI 5 of the London Plan.

### ***Environmental Impact – Acceptable***

6.5.38 The application is accompanied by noise, wind, sunlight, daylight and overshadowing assessments, the results of which are reported elsewhere in this report. The Application is also accompanied by an Air Quality and Air Quality Neutral Assessment, prepared by IDOM which concludes that the Scheme achieves Air Quality Neutral and is acceptable with regards to air quality during both the construction and operational phase of the development.

### ***Cumulative Impact - Acceptable***

6.5.39 Part C4a of policy D9 considers that the cumulative visual, functional and environmental impacts of the proposed, consented and planned

tall buildings in an area must be assessed, with mitigation measures designed into buildings from the outset. There are no planned or consented tall buildings within the vicinity of the site.

### ***Layout - Acceptable***

- 6.5.40 The opportunity to redevelop the site and replace ageing buildings which currently provide a poor standard of accommodation is welcomed. It is important that new development makes a positive contribution to the setting and has an appropriate relationship with the surrounding context. The key design principles and Masterplan concept which includes creating visual links to the park, improving permeability through the site, and reflecting the character of the setting with a landscape-led approach are supported.
- 6.5.41 The proposed layout featuring open courtyard blocks with a permeable north-south pedestrian green link running through the centre of the site linking a series of communal amenity spaces is supported. The siting of the blocks set back from the park edge (to the east) to create an uninterrupted ecological corridor and set back from Southend Road (to the west) to retain the existing green buffer fronting the street is considered to be an appropriate response to the site and the setting. The rationale for the introduction of 3 east-west streets in between the respective courtyard blocks to facilitate vehicle access and servicing is accepted, subject to highways safety considerations.

### ***Appearance - Acceptable***

- 6.5.42 Policy D9 further requires developments which propose tall buildings to be of the highest architectural quality, The design intent for the buildings to respond to the key character areas (Southend Road and Beckenham Place Park) in their form and elevational treatment (stepping up to the street edge and down to the park edge) is supported. The opportunity to visually differentiate the blocks with variations in articulation and detailing is also welcomed.
- 6.5.43 The proposed stringcourse banding at 2 storey level to retain a sense of human scale on the larger blocks is welcomed as is the soldier course/patterned brickwork detailing and stringcourse/dentil banding parapet design which will collectively add visual interest to avoid large featureless facades. The balcony strategy comprising of part solid balustrades fronting Southend Road and 'lighter' open balconies fronting the park (where the balance between views into and out of private amenity spaces is less of an issue) allowing unobstructed views of the park is supported. The rationale to emulate the elevational treatment of the larger blocks for the townhouses but with a simpler more domestic language is accepted.
- 6.5.44 The proposed red and buff brick finish is supported in principle, however officers considered that the opportunity to vary the use of

brick colour/tone across the site should be explored i.e. potentially differentiating the 'urban edge' street facing blocks from the 'softer' park edge blocks in order to avoid a monotonous feel as you move through the site – particularly given that each of the courtyard blocks are of similar a scale and height.

6.5.46 The applicant provided an updated design report pack on 2.12.22. The design pack sets out the rationale for the proposed materiality of the blocks. With regards to the Southend Road elevation, in order to create a strong and ordered identity, setting the building back on the sides reduces the visual impact whilst the central bay gives an appearance of grandeur to the Street. A darker tone of brick has now been chosen to reflect this grandeur. In recognition of the sensitivities surrounding the park edge, a lighter tone of brick has now been selected for the mansion blocks which border this. For the townhouses, the revised elevations seek to emulate the elevation treatment of the apartment buildings, with a simpler more domestic language.

6.5.47 Comments were also raised with regards to the use of colour variation to define the entrances to create individuality. Through the adoption of the above colour pallet, each of these block types are finished with a complimentary material palette which includes entrance pallets that ensure that individually identifies to the different block designs is achieved.

6.5.48 The revised brick strategy (introducing 2 variations) is welcomed by officers. The use of a darker tone reddish/brown brick for the roadside blocks and lighter red brick for the parkside blocks is supported in principle – subject to physical samples being provided/assessed by condition. The type and quality of all external materials will be secured by condition.

## **6.6 Transport and Highways**

### ***Car Parking - Acceptable***

6.6.1 Policy T6 of the London Plan requires developments to provide the appropriate level of car parking provision with Policy T6.1 of the London Plan setting maximum car parking standards.

6.6.2 Section 38(5) of the Planning and Compulsory Purchase Act (PCPA) 2004 (as amended) states: *“if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”* Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) goes on to state that decisions on planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.

The London Plan car parking standards would therefore take precedence over those set out in the Local Plan.

- 6.6.3 The site has a PTAL rating of 2. Based on the unit size mix proposed, for a PTAL 2 site the maximum parking provision for this development as set out in the London Plan is 221.5 spaces. The applicant is providing a total of 124 parking spaces for the proposed development + 1 car club bay.
- 6.6.4 Based on the housing needs survey of the existing residents 78 spaces will be allocated to existing residents so all existing units with access to a car will receive a parking bay. The additional 46 bays will be allocated on short-term leases to the larger 2 and 3 bed units (of which there are a total of 49). It is proposed that additional private parking bays will be allocated to the larger family units on short-term leases. This results in a parking ratio of 0.45 spaces per unit when considering the additional private units.
- 6.6.5 All of the one-bedroom units will be car free (apart from those residents who already have access to a car) and membership of a car club will be offered to residents. The applicant will be required to cover the costs of the car club and provide the dedicated on-site bay, and this will be secured as part of the S106 legal agreement.
- 6.6.6 Electric Vehicle charging points are also provided in line with the London Plan with 20% active charging from the outset and 80% passive for all remaining bays.
- 6.6.7 9No. Blue Badge Parking spaces will be provided which meets the requirement for 3% of the total number of dwellings to have access to at least one designated disabled persons bay from the outset, as set out in London Plan policy T6.1. All blue badge parking would be allocated on a needs basis rather than tied to a partial home and rented on short-term lease. This will be managed through a Parking Management Plan which should be secured through a planning condition.
- 6.6.8 The Council's Highways officer has not objected to the proposed level of parking for the development which will enable the delivery of a higher quality, more pedestrian focused landscaped setting and enough parking for all existing households with access to a car to have one allocated space. All on-site parking will be provided in off-street parking bays and a Resident Permit Parking Scheme (RPPS) will operate and be enforced privately by the developer within the site through appropriate signage, road markings and patrolling where necessary.
- 6.6.9 The estate roads will not be adopted by LB Bromley Highways and parking on the internal roads will need to be enforced by an on-site management team. The application sets out that Civil Enforcement

Officers (CEOs) will actively patrol the site to monitor on-street parking operations and move drivers on or issue Penalty Charge Notices (PCNs) if required. Full details of the provisions for controlling parking on the estate are required as part of a Parking Management Plan condition.

- 6.6.10 The applicant is proposing an extension of the double yellow lines along Southend Road at the frontage of the site. This is a continuation of the existing kerbside restrictions on Southend Road north of the site. At present, vehicles are parking on Southend Road along the site frontage and interfering with bus routes and the existing vehicle access. The proposals are therefore improving the free flow of traffic for bus operations, protecting the proposed vehicle accesses as well as improving pedestrian accessibility with the introduction of new pedestrian crossing on Southend Road.
- 6.6.11 There are significant concerns from local residents that there isn't enough parking for the development leading to increased parking pressure in the surrounding road network, particularly when there are events taking place in Beckenham Place Park or Kent County Cricket Ground. In turn residents are concerned that this could lead to detrimental road safety impacts and emergency vehicles not being able to gain access. Conversely, TfL have requested a further reduction in car parking and are of the view that further mitigation is required to make the new estate roads more pedestrian friendly and not dominated by surface car parking.
- 6.6.12 Policy D9 of the London Plan requires applicants to demonstrate that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people working and living in the building.
- 6.6.13 The application site is approximately 800m from Beckenham (District Centre) town centre. The site benefits from a variety of public transport services within walking distance, with Beckenham Hill and Beckenham Junction Stations approximately 13 minutes walk away, and bus stops located within immediate vicinity. The Bromley to Sydenham cycle route that crosses Southend Road is approximately 700m away from Calverley Close.
- 6.6.14 In terms of trip generation, the proposed development is expected to result in a total of 288 two-way total person trips in the morning peak and 166 in the evening peak. Of these trips a total of 74 and 43 two-way car driver trips forecast within the AM and PM peak hour, respectively. This equates to approximately one vehicle every minute within the peak hours which is considered to have a non-material effect on the local highway network particularly when broken across three access / egress points (para. 5.4.2, Transport Assessment (TA), May 2022).

6.6.15 Regarding the impact on local bus services, at paragraph 6.2.7 of the TA it is expected that the proposed development will generate a net additional three two-way total bus trips in the morning and evening peak hours. The site location benefits from stops directly adjacent to the site, with the 54 service arriving every 8 to 11 minutes from Stop U and 9 to 12 minutes from Stop T. This equates to approximately 6 bus services during peak hours from each of these stops. There are also many other stops within walking distance of the site offering the 352, 354 and 162 services.

6.6.16 TfL requested further work in order to demonstrate that additional bus passengers, on route 54, the only bus service which runs adjacent to the site, would not result in peak time crowding. The applicant provided the following response on the 9.11.22:

Bus route 54 provides one northbound and one southbound service every 8-12 minutes. This equates to 5 services in each direction during the peak hour period. On this basis, the proposals are forecast to generate an additional 1.5 - 3 passengers per bus (subject to preferred direction) during the busier AM peak period. This increase could be accommodated on the existing bus network and considered acceptable in transport terms.

6.6.17 On this basis, the forecast level of bus trips associated with the proposed development is unlikely to impact materially on the existing operation of the local bus network.

6.6.18 Furthermore, the applicant's Active Travel Assessment identifies a number of well-used routes in the vicinity of the site which would benefit from public realm and highways improvements. Accordingly, the developer is required to contribute towards improvements to the walking experience along Southend Road, including a new pedestrian crossing and new signage to the local rail stations, as well as a contribution towards the provision of cycle facilities between the new controlled crossing and the junction with Park Road/Foxgrove Road which will link with the Bromley South to Sydenham cycle route. A contribution towards the carrying out of a parking study is also sought by LBB Highways to help to ascertain whether additional parking controls need to be implemented elsewhere. These will need to be secured through S106 legal agreement.

6.6.19 Taking into consideration the relatively low PTAL rating of the site, along with the accessibility to local services and cycle routes, the expected number of trips which the development will generate and the public transport options available to residents, officers are of the view that the proposed level of car parking strikes an appropriate balance between meeting the needs of the existing and future residents of the estate whilst encouraging more sustainable transport modes in line with the Mayor's Healthy Streets approach in policy T2 of the London Plan. It is considered that the remaining trips forecast on sustainable transport modes could be accommodated on local pedestrian, cycle,

and public transport networks, with consideration to the existing infrastructure available.

- 6.6.20 As per TfLs request, as part of the Parking Management Plan condition, a requirement for the monitoring of parking demand over time can be included and, if appropriate, parking on the site can be reduced in favour of additional landscaping or bicycle parking. This will also need to be informed by the parking study.
- 6.6.21 A Travel Plan will also be implemented to further promote sustainable transport modes amongst residents and visitors to and from the site. A comprehensive, updated Travel Plan is required through condition.
- 6.6.22 Subject to the measures outlined above being appropriately secured, the proposed parking for the development is considered acceptable.

### **Cycle Parking - *Acceptable***

- 6.6.23 500 No. long-stay and 8 short-stay cycle parking spaces have been proposed, which is in accordance with the standards identified in Policy T5 of the London Plan. The proposals provide a mix of stands comprising of 80% two-tier, 15% Sheffield and 5% accessible Sheffield in line with LCDS recommendations. Details will be included within the Car and Cycle Management Plan expected to be secured via condition.
- 6.6.24 It is proposed to provide all long-stay cycle spaces for the flats within dedicated, secure, internal cycle store areas located at ground level within each block. There are some safety concerns in regard to the cycle stores that are accessed externally only as this could lead to users being followed into cycle stores with no alternative means of exit. It may also make it easier for thieves to break into these rooms. These issues fall within the remit of TfL's and the Council's duties under Section 17 of the Crime and Disorder Act 1998. In order to improve safety TfL state that lobby access should be provided to all cycle stores so that users experience the same level of security as those arriving to the development by any other means. The applicant has not addressed this issue, however, it is anticipated that the residential cycle stores with direct access to the public realm would be controlled by key fob, well-lit and would avoid stairs and multiple doorways while providing convenient access to the street. Suitable arrangements can be secured as part of a Cycle Management Plan which can be secured via condition. A Secured by Design condition is also recommended.
- 6.6.25 For the townhouses, cycle parking will be provided within the private amenity. A cycle shed facility (or something similar) would be provided on-plot meaning the bike would be covered and out of sight. This also gives the user greater flexibility when using the facility. Whilst TfL would prefer communal cycle stores for the houses, the provision of on-plot spaces could be accepted and it is recognised that these may be preferred by residents. However, they must be designed in

accordance with the LCDS and should, as provided, be “covered, out of sight and secure”. In addition, on-plot cycle parking should still be securely lockable with a rack type that allows for a U-lock for the locking of both the frame and wheel (e.g. Sheffield stand) and should not require manoeuvring through multiple doors or any habitable rooms. Details will be included Cycle Management Plan which can be secured via condition.

6.6.26 Visitor cycle parking will be located in accessible landscaped areas and provided entirely in the form of 4no. Sheffield stands. These will be provided in the public realm in accessible locations short distances from building entrances. Details will be included Cycle Management Plan which can be secured via condition.

### ***Vehicular Access - Acceptable***

6.6.27 The proposal replaces one single vehicular access point from Southend Road (Calverley Close) with three separate entrances onto three private roads, all leading to surface car parking. TfL consider that this *“plainly represents a degradation of the quality of the streetscape and worsens the walking and cycling experience along Southend Road by increasing the potential for vehicle and pedestrian/cyclist conflicts, contrary to Healthy Streets principles and Vision Zero objectives”*. Resident’s concerns over the safety and visibility of pedestrians in this regard are also noted.

6.6.28 TfL say that, ideally, the proposed parking/vehicular access areas should be consolidated, and the overall levels of car parking reduced, however, in the absence of this, significant mitigation measures and robust justification would be required to make this arrangement acceptable from a Healthy Streets perspective. This should include, amongst other things, traffic calming measures with physical infrastructure (e.g. raised pedestrian crossings) at the accesses, wide footways, and appropriate landscaping and street furniture to provide a buffer from traffic.

6.6.29 The applicant’s response (received 9.11.22) explains that the proposed access arrangement removes the need for a large looping internal carriageway that would have a detrimental impact on the Beckenham Place Park boundary while unnecessarily reducing developable space and landscape. Each access has been designed with healthy streets in mind and includes segregated footways with dropped kerbs and tactile paving. Footways within the site benefit from vehicle segregation, material change delineations and raised table features. The proposed access arrangement spreads residential traffic associated with the development rather than forcing all traffic to enter and exit via a single route. This creates a calmer environment for pedestrians and cycles. The detailed design of all the new access points will be subject to S278 Highways agreements.

6.6.30 The proposals also seek to relocate the bus stop on Southend Road to a central position away from the southernmost vehicle accesses, along with introducing double yellow lines along the site frontage. While TfL's preference would be to modify the proposed vehicular access so that the existing bus stop and cage does not need to be relocated, the proposed relocation appears generally minor and is likely to have a negligible impact on bus operations. However, TfL Asset Operations will need to confirm the acceptability of the proposed arrangements prior to any works taking place. The replacement of the bus stop and road markings will be at the applicant's expense.

### ***Deliveries and Servicing - Acceptable***

6.6.31 An Outline Deliveries & Servicing Management Plan has been submitted in support of the application. Deliveries and servicing are generally proposed to be handled through the three proposed access roads. As outlined in section 3.7.7 of the TA, the proposals include an internal layout that provides parking facilities and a route for vehicles to service the site.

6.6.32 Suitable bin waste drop-off locations are provided to ensure minimum drag distances achievable on site. As shown, the proposals provide 6m wide carriageways throughout the site and appropriate turning facilities meaning all vehicles can enter and exit the site in a forward gear. This represents an improvement over the existing arrangements where, currently, refuse trucks and other large vehicles tend to reverse over pedestrian footways.

6.6.33 Appendix B of the Transport Assessment (TA) includes a full set of vehicle tracking for a LBB refuse vehicle (70085601-DP-SK-07), general car (70085601-DP-SK-08), fire tender (70085601-DP-SK-10) and a UKPN HIIAB lorry (70085601-DP-SK-12).

6.6.34 Delivery and servicing vehicles would briefly stop within the carriageway before turning and leaving the site. The access arrangement provides sufficient space for a vehicle to stop and service the buildings whilst maintain a clear access route for passing vehicles. It is envisaged that the majority of servicing vehicles will leave soon after delivery given typical short dwell times.

6.6.35 LBB highways have also noted that deliveries to residential developments are increasing rapidly with the rapid growth of on-line shopping and, given the scale of the proposal and difficulty in proactive management, this is likely to be a key consideration, both in terms of physical space and impact on the traffic operations. The applicant's TA outlines a total of 39 delivery and servicing vehicles to access the site across a typical day. However, the applicant is of the view that the proposed development could accommodate deliveries in excess of this forecast, on-site, away from Southend Road should demand rise in the future. This is acceptable. A full Deliveries & Servicing Plan should be

secured by way of a planning condition. A refuse and recycling storage condition is also recommended.

**Construction impacts - *Acceptable***

6.6.36 The application was accompanied by a draft Construction and Environmental Management Plan (CEMP), an updated CEMP received on 2.12.22 and a Construction Logistics Plan (dated May 2022) which sets out that the overall construction is expected to last for a duration of 10 years 6 months, starting with the demolition of Warner House and the construction of the houses in Phase 1.

6.6.37 A number of objections have been received from existing tenants and other local residents concerning the length of the construction period, traffic and road safety impacts, noise, mess and dust impacts as well as the impact on quality of life in general.

6.6.38 It is inevitable that the impacts associated with the demolition and re-development of the existing estate will, over a prolonged period, cause a degree of harm to the amenities of existing residents. However, problems arising from the construction period of any works are rarely a material planning consideration. Notwithstanding this, to assist in the process of determining compliance with the objectives of the public sector equality duty in this regard, the applicant has undertaken an Equality Impact Assessment which considers how the demolition and construction may impact on groups with certain characteristics which the Equality Act protects.

6.6.39 Moving off the estate will be offered to every tenant before and during demolition and construction, with the right to return once their new home is built. The single move decant will ensure that tenants remain with their local support networks and within their community.

6.6.40 A detailed construction plan will be communicated to residents to provide clarity, assurance and clear timescales on each phase. This will include details of estate management, safety and security, parking management, construction hours and pre-planning on noisy and messy works. All information will be provided in appropriate languages and formats. In addition, the applicant will liaise with LB Bromley to identify and access local housing stock for those tenants unable to cope with the noise and disturbance during the construction period.

6.6.41 The assessment also considers parking arrangements during demolition and construction and says that the applicant will work with Bromley Council to maximise off-site, street parking during this time. Whilst this is unlikely to be acceptable from a road safety perspective due to impact on the SRN, it is noted that temporary car parking for residents will be provided on site throughout the development. This will be assessed at the beginning of each phase and priority will be given to those registered disabled. An indicative location for site

accommodation and temporary parking for the build out of Block 2A and for future phases is set out in the CEMP and will need to be secured as part of the final CEMP.

- 6.6.42 In order to reduce the risk of health effects during demolition and construction the applicant will consider undertaking a health and wellbeing survey for every tenant on the estate to identify potential health effects during construction and will ensure that any negative health effects identified are mitigated within the CEMP / code of construction practise.
- 6.6.43 The Council's Environmental Health Officer (EHO) has reviewed the draft CEMP presented as part of the initial submission and considers that it is not sufficient for providing the necessary controls and management for noise and dust/air quality. With regard to noise, monitoring will be required to ensure impacts are managed and given the scale and length of the construction project it would be important for the CEMP to provide details on continuous noise monitoring with identified noise trigger levels, referring to the BS5228-1:2019, Appendix E for appropriate trigger levels. There should be a plan of where the monitors are to be located for each of the phases of construction, along with where it is in relation to the nearest noise sensitive premises.
- 6.6.44 With regard to dust/air quality, the EHO states that the mitigation and monitoring recommended in the Section 9 of Air Quality and Air Quality Neutral Assessment prepared by IDOM, May 2022, Ref: AQA-21949N-21-430 REV A should also be included in the CEMP. Given the scale and length of the project continuous monitoring will be required, managing the impact to surrounding neighbouring premises and, as it is phased, the impact on any resident that may have moved into previous phases should be incorporated within the CEMP for both the noise an air quality/dust.
- 6.6.45 The applicant provided an updated CEMP on 2.2.12 which takes account of the Environmental Health Officer's comments. It states that Countryside will be undertaking noise monitoring on the site as well as undertaking a number of other noise control measures which are set out in the CEMP. In the event that the measured ambient noise level within a specific period is such that the Lowest Observed Adverse Effect Level (LOAEL) for that period will necessarily be exceeded, an alert will be raised informing the PM and CLO, or other notified responsible person, that construction work and current activities should be reviewed. Thereafter, if feasible, works would be modified to reduce the amount of noise generating activity occurring as far as practicable to limit noise impact.
- 6.6.46 In the event that the measured ambient noise level within a specific period is such that the Significant Observed Adverse Effect Level (SOAEL) for that period will necessarily be exceeded, an alert will be

raised informing the site manager, or other notified person, that construction work should cease to prevent significant noise impacts.

- 6.6.47 Dust mitigation measures are also detailed in the CEMP with the dust monitoring locations for each phase to be submitted for agreement with LBB prior to the commencement of each Phase of development.
- 6.6.48 Full details of a scheme of construction noise and dust mitigation, along with details of the proposed phasing and working hours, should be provided within the final CEMP. A CEMP will need to be submitted to and approved prior to each phase as the impacts and mitigation will vary depending on the nature of the construction works.
- 6.6.49 In order to mitigate disturbance to nearby residents, demolition and construction hours will need to be restricted to 0800 to 1800 hours Monday to Friday and 0800 to 1300 hours on Saturdays. No noisy works will be permitted on Sundays or Public Holidays. Separate enforcement powers are available to this Department in this regard under the provisions of section 60 and 61 of the Control of Pollution Act 1974.
- 6.6.50 A non-road mobile machinery (NRMM) condition is also recommended.
- 6.6.51 Furthermore, a detailed programme of works, sequencing both the on and off-site works and the types of vehicles servicing the construction will need to be submitted to and approved by the LPA as part of a full Construction Logistics Plan (CLP), prior to any demolition taking place (with the exception of Warner House which benefits from demolition consent).
- 6.6.52 The CLP should demonstrate how the operation of the adjacent bus stop and bus services more generally are not impacted and likewise a pleasant and safe environment for pedestrians and cyclists is maintained. If there is any impact on bus operations this must be discussed with TfL prior to any approval. Delivery and waste hours should avoid peak times as well as drop-off/pick-up hours of local schools.
- 6.6.53 Having regard to the above, subject to the detailed CEMP and CLP being secured through planning conditions, it is not anticipated that granting planning permission would adversely affect the objectives of the public sector equality duty.

## **6.7 Neighbouring Residential amenity - Acceptable**

- 6.7.1 Objections have been received from local residents with regard to the impact of the development on properties opposite the site on Southend Road, including the locally row of terraces at 39 to 59A Southend Road and tower blocks Keats House, Byron House and Blake House in Porchester Mead. In particular concerns have been raised in relation

to overlooking, impact on outlook, loss of privacy, loss of light and impact on views, including those of the park.

6.7.2 As discussed in the Council's Statement of Community Involvement (paragraph 4.4.8) the Council can only take into account planning considerations. Comments received must relate to planning matters which include national and local planning policy, and the following types of concerns are not generally planning considerations and cannot be taken into account:

- Loss of value to property
- Commercial competition
- Loss of a view
- Disturbances during building work
- Land ownership disputes
- Private deeds or covenants
- Where development has already started
- Matters covered by other legislation including licensing or gambling

6.7.3 This is a previously developed site which is already occupied by higher density, flatted development. Whilst the height of the proposed blocks would exceed those existing on the site, the introduction of 3 east-west streets in between the respective courtyard blocks would retain the visual links from Southend Road through to the park. Therefore, whilst there would be a change in views along Southend Road as a result of the increased height and massing, the visual relationship with the park would be largely maintained.

6.7.4 The provision of six storeys at the rear of the site and seven storeys fronting Southend Road has been developed in response to the changes in the site's east / west level change and in order to preserve views out of the adjoining Beckenham Place Park conservation area. The applicant proposes to deliver a tree planting strategy which seeks to strengthen the boundary of the Site with the neighbouring Beckenham Place Park. Furthermore, the setting back of the proposed blocks from Southend Road to maintain the existing green buffer at the front of the site, along with new tree planting and landscaping would help to soften the appearance of the development in the street scene.

6.7.5 With regards to the potential for overlooking and loss of privacy, the proposed blocks fronting Southend Road would be sited a minimum of around 40m from the nearest residential properties on the opposite side of Southend Road. Block 4B, which resides closest to the southern site boundary, would be sited around 10m further away from No.44 Southend Road than the existing building.

6.7.6 Based on the separation distances to the closest residential sites, the development is not anticipated to give rise to any significant overlooking or loss of privacy to existing residents. In addition, both the southern and western boundaries of the site benefit from existing

mature trees which would be retained as part of the proposals and supplemented with additional planting. All of this would help to screen the development from the surrounding residential sites and reduce the visual impact.

- 6.7.7 The application was accompanied by a Daylight, Sunlight and Overshadowing assessment. A daylight/sunlight analysis was undertaken of the surrounding residential buildings using the Vertical Sky Component (VSC) test and the Daylight Distribution test. This included an analysis of the properties opposite at 39 – 59A Southend Road, Walnut Court 33 Southend Road and no's 61, 63 and 65 Southend Road. It also included Conifer House 44 Southend Road which lies to the south of the application site.
- 6.7.8 The Vertical Sky Component (VSC) quantifies the amount of available daylight, received at a particular window and measured on the outer pane of Proposed buildings Surrounding residential buildings the window. The maximum VSC value for a completely unobstructed vertical window pane is 40%. In order to maintain good levels of daylight the BRE guidance recommends that the VSC of a window should be 27%.
- 6.7.9 A measure to assess the distribution of daylight in a space is the percentage of area that lays beyond the no-sky line, i.e. the area that receives no direct skylight. This is important as it indicates how good the distribution of daylight is in a room. If more than 20% of the working plane lies beyond the no-sky line, poor daylight levels are expected within the space.
- 6.7.10 Following the review of the preliminary studies, the design of the development was adapted to reduce the impact on the properties. The applicant states that the proposed massing is the result of adjustments which try to reduce the impact on the surrounding properties as much as practical.
- 6.7.11 The results of the assessment show that with the proposed development in place, 100% of the windows analysed in the neighbouring properties would meet VSC of above 27% and 100% of the rooms analysed would meet the Direct Distribution test. Therefore, all of the neighbouring properties which were analysed would meet or exceed the BRE recommendations for the VSC and NSL values.
- 6.7.12 Having regard to the above, it is considered that, once built, the proposed development would not give rise to any significant, unacceptable impacts on the amenities of the occupiers of neighbouring properties.

## **6.8 Green infrastructure and Natural Environment - Acceptable**

- 6.8.1 Open spaces which are planned, designed and managed as green infrastructure provide a wide range of social, health and environmental benefits, and are a vital component of London's infrastructure (policies G1 and G4, London Plan). In areas deficient in access to open space the Council will seek to secure improvements in the amount and distribution of, and access to, open space (policy 59, Bromley Local Plan).
- 6.8.2 Policy G5 of the London plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 6.8.3 Within the London Plan, Policy G7 (Trees and Woodlands) states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 6.8.4 At a local level, Policy 73 (Development and Trees) of the LBB Local Plan states that proposals for new development will be required to take particular account of existing trees on the Site and on adjoining land, which in the interest of visual amenity and/or wildlife habitat, are considered desirable to be retained.

### ***Landscaping, Trees and urban greening***

- 6.8.5 The sites' location in an area identified in the Bromley Local Plan as being deficient in access to public open space is pertinent meaning that delivery of high-quality, landscaped open spaces on the site will be key to the success of this scheme.
- 6.8.6 In this regard, the merits of the overarching landscape vision; responding to the character of the setting (clearly defined character areas), enhancing existing green infrastructure (green corridor), encouraging pedestrian movement (permeable north-south link), recreation and social interaction (prioritising communal shared amenity spaces) are acknowledged and strongly supported by officers. The communal courtyards are considered to be the most important element of the landscape strategy encouraging social interaction and community cohesion.

- 6.8.7 The creation of wider crossing points, changes to surface treatment and tree planting through the north-south pedestrian route in response to previous comments to improve legibility (avoiding a physical/perceptual barrier to movement from the car parking bay configurations) is welcomed. Officers share the GLAs concerns however that the aspiration to create 'green streets' will be challenging given the car parking/servicing requirements of the site and there is a risk that the east-west streets could be dominated by car parking similar to the existing site condition. The Council's urban design officer considers that the proposed use of asphalt for the surface of the east-west streets implies vehicle priority – contrary to the pedestrian priority ethos of the scheme and an alternative surface treatment creating more of a shared surface feel would be more appropriate.
- 6.8.8 In response to the above, the applicant says "*the proposed east-west routes will be offered for adoption and in line with the Council's material pallet for adoption. The Applicant team have reviewed the options available and remain confident that the proposed materiality strikes an appropriate balance between creating pedestrian priority and the practical use of these internal roads for vehicular access*". Whilst LB Highways will not be adopting the internal estate roads, the materials used will still need to conform to certain 'highways' standards in order to pass future road safety audits. The final details for the external materials can be conditioned as part of a hard and soft landscaping condition.
- 6.8.9 It should also be noted that these streets have been designed for use by the residents of the proposed Blocks and do not form part of the wider street network. In the light of this, it is anticipated that the amount of vehicular traffic will be limited. Furthermore, dedicated crossing points on the north-south route have been provided to prioritise pedestrian movement in between residential courtyards. This, in tandem with the introduction of street trees in low level planting, seeks to break up the parking arrangements and delivering a valuable and improved pedestrian environment on the site. The inclusion of rain gardens and tree planting to enhance the character of the streets is welcomed by officers.
- 6.8.10 There are a number of existing trees on site. It is clear that the retention of trees of value has been carefully considered within the Design and Access Statement (DAS). The applicant has provided an Arboricultural Impact Assessment (AIA), which states that 59 individual trees are to be removed to facilitate the proposed development, including Category B trees and a single Category A tree. 40 standard trees and 57 multi-stemmed trees are proposed to be planted.
- 6.8.11 The retention of existing mature trees within the site is welcomed, as is the additional tree planting across the scheme. Whilst the proposed removals are numerous, they are mostly lower value trees that are more readily replaceable. The species of tree and canopy size/growth

in between the courtyards and other parts of the site will therefore require careful consideration in order to positively enhance the scale and character of the streets and spaces (aiding legibility and improving visual amenity) and to ensure that when trees are removed appropriate compensation planting to replace the services lost by the existing trees (such as pollution removal, carbon storage and storm water attenuation) is secured.

6.8.12 The indicative landscape plans show significant tree planting and the Council's tree officer considers that this should adequately mitigate the losses. However, the GLA have requested an assessment of the value of the trees to be lost using the 'i-tree' or 'CAVAT' valuation systems in order to demonstrate compliance with policy G7 of the London Plan. The applicant has not prepared such an assessment but, instead, to evidence the appropriateness of the submitted mitigation strategy, Aspect and HTA Landscape have prepared a canopy change assessment as an alternative means of balancing the loss of canopy cover against the schemes planting proposals. The assessment is based on the submitted tree strategy and shows the projected canopy sizes after a 25 year period and concludes that there will be no net loss of canopy cover across the site and demonstrates that replacement planting is of a scale and type that is sufficient to mitigate for the removals.

6.8.13 The GLA are satisfied that the canopy change assessment as detailed by the applicant's arboriculturists would assist with a decision on this matter in the event that the value assessment cannot be prepared.

6.8.14 The landscaping scheme achieves a policy compliant urban greening factor score of 0.4 in accordance with policy G5 of the London Plan.

6.8.15 Planning conditions requiring the submission and approval of a Landscaping & Ecological Management Plan (LEMP) and a detailed Landscaping Plan (including the exact number and species of trees to be planted), are recommended.

### ***Nature Conservation & Protected Species***

6.8.16 Beckenham Place Park LNR/SINC is located immediately adjacent to the north and east of the site. In accordance with Bromley Local Plan policy 69, a development proposal that may significantly affect the nature conservation interest or value of a Local Nature Reserve (LNR), Site of Importance for Nature Conservation (SINC) or a Regionally Important Geological Site (RIG) will be permitted only:

- If it can be shown that the reasons for the development or benefits to the local community from the development outweigh the interest or value of the site, or
- Any harm can be overcome by mitigating measures, secured through conditions or planning obligations.

- 6.8.17 Policy 72 of the Local Plan states that planning permission will not be granted for development or change of use of land that will have an adverse effect on protected species, unless mitigating measures can be secured to facilitate survival, reduce disturbance or provide alternative habitats.
- 6.8.18 The application is accompanied by a Preliminary Ecological Appraisal (PEA), prepared by Aspect Ecology which proposes a number of mitigation measures in order to minimise potential harm to the habitats within the SINC designation during construction works, as well as other mitigation and enhancements following completion of the development.
- 6.8.19 The mitigation measures include a range of items including provision of space for the identified Pyramidal Orchid to be retained at the south west end of the site where there will be no built development. This is proposed to be an amenity area with a mix of planting types and so it can be subject to relaxed mowing. The LEMP condition can be used to incorporate this aspect of the site's future management. There is also a comprehensive range of ecological enhancements, full details of which should be secured by condition alongside the mitigation.
- 6.8.20 With regard to protected species, the PEA finds that the habitats within the site have the potential to support several protected species. As a result of this, further survey work (including emergence/re-entry surveys) was undertaken for building B5 as well as an eDNA test the check for Great Crested Newt (GCN) presence.
- 6.8.21 The bat emergence/re-entry survey recorded no emergence or entry, but general activity was recorded and therefore artificial boxes/bricks for bats may be beneficial. The trees with bat roost potential are proposed to be retained (T2, T6 and T7). A sensitive lighting condition is necessary, as specifically recommended within the bat report, as existing artificial lighting levels are high at the site. No other protected or priority species have been identified as present.
- 6.8.22 The newt Technical Briefing Note describes how the eDNA test has been carried out and returns a negative result. This is to be expected as officers are not aware of any GCN presence in the west of the borough.
- 6.8.23 Following the successful implementation of the mitigation measures, the proposal is unlikely to result in any significant adverse effect on the adjoining SINC or protected species utilising the site.
- 6.8.24 London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 Part D further advises that *“Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best*

*available ecological information and addressed from the start of the development process."*

6.8.25 These proposals present the opportunity to secure a number of biodiversity net gains, including additional native tree and shrub planting, new roosting opportunities for bats, and more diverse nesting habitats for birds. The application is also accompanied by a Biodiversity Net Gain calculation and considers the change in ecological value of the site in light of the proposed development. The Biodiversity Net Gain report identifies that as a result of the proposed landscaping scheme, the development will result in a net gain of 1.12 biodiversity units. This equates to a net gain of 12.52% which accords with the policy requirement. A detailed programme of Biodiversity Enhancements should be secured by way of condition.

6.8.26 In summary there is nothing within the ecological assessments that would be of significant concern, subject to the above recommended planning conditions.

## **6.9 Energy & Sustainability - Acceptable**

### ***Minimising Greenhouse Gas Emissions***

6.9.1 The London Plan Policy SI2 – Minimising greenhouse gas emissions - states that Major development should be net zero-carbon, reducing greenhouse gas emissions in accordance with the energy hierarchy:

- 1) be lean: use less energy and manage demand during operation
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- 4) be seen: monitor, verify and report on energy performance.

6.9.2 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

6.9.3 A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required – Of the 35% residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.

6.9.4 Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

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

- 6.9.5 Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 6.9.6 Policies 123 and 124 of the 2019 Bromley Local Plan are consistent with the strategic aims of the London Plan energy policies.
- 6.9.7 The application is accompanied by an Energy Statement by EEABS which demonstrates that the carbon emissions and overall energy strategy of the Proposed Development will meet the requirements set out within the London Plan and the LBB's Local Plan. The Proposed Development will result in a 39.68% reduction in carbon dioxide emissions when using the SAP 12 emissions figures and 62.02% when adopting the SAP 10.0 emission figures.
- 6.9.8 Notwithstanding the policy compliant carbon saving, to achieve the required net zero carbon a financial payment is required. Based on the use of the SAP 10 emission factors a financial contribution of **£384,608** would be required and will need to be secured through S106 legal agreement.
- 6.9.9 Addressing the "Be Lean" element of the policy, savings have been made as a result of the increased performance of the building's construction and air permeability. Further savings have also been realised through the use of highly efficient ventilation and lighting systems. By implementing the Be Lean measures there would be an improvement on carbon emissions of 13% meaning that the 10% carbon reduction target is met.
- 6.9.10 Addressing the "Be Clean" element of the policy, each of the flatted accommodation blocks will have their heating supplied from a central energy centre. Air Source Heat Pumps will provide 80% of the energy centres total heating demand with the remaining 20% providing by ultralow NOx gas fired boilers with assumed efficiencies of 94%. The town houses will each have their own air source heat pump system.
- 6.9.11 The applicant has confirmed that the central energy centre will feed local Heat Interface Units within each dwelling apart from the townhouses. The applicant has provided a drawing showing the route of the heat network linking all buildings on the site and the future connection to DHN route together with a drawing of the energy centre demonstrating space for heat exchangers in the energy centre demonstrating the space for heat exchangers in the energy centre.
- 6.9.12 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has tried to contact relevant stakeholders including the borough energy officer, local heat network operators and

nearby developers to ask whether they know of any local heat network connection opportunities. The applicant has applied further efforts to confirm the DHN potential for the site. Whilst no response was received from the Borough energy officer, given the commitment to futureproof the proposed development for connection the GLA have confirmed that nothing further is required at this stage. The requirement that the development is designed to allow future connection to a district heating network is to be secured through a suitable condition.

- 6.9.13 The energy statement goes through the potential renewable energy technologies (“Be Green”) that could be used to bring the carbon reduction to the minimum of 35% on-site. It concludes that air source heat pumps (ASHPs) and Photovoltaic panels (PVs) would be the most feasible renewable technologies to install for the proposed development.
- 6.9.14 A roof layout has been provided which shows much space for PV has been utilised, however, it appears that there may be additional space for PV. Following the initial submission, the applicant has provided a revised detailed roof plan in which 230kWp of PV's is proposed. It is welcomed that the applicant has increased the PV provision; however the roof layout provided is not large enough to confirm if the roof space has been maximised, and this plan does not indicate clearly the barriers to PV.
- 6.9.15 Detailed roof layouts demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, should be secured through planning condition, as part of an updated energy assessment.
- 6.9.16 Finally, with regards to “Be Seen” the London Plan at policy SI 12 requires developments to monitor and report annual energy demand and carbon emissions post-construction for at least five years. The central energy centre will be automatically monitored to ensure it is running at optimum efficiency. The energy generated from the PV systems would also be monitored and reported. This will need to be secured through S106 legal agreement.

### ***Whole Life-Cycle Carbon (WLC) Assessment***

- 6.9.17 The applicant has submitted a WLC assessment which will be reviewed separately by the GLA at Stage 2. Any planning permission subsequently granted will be subject to a condition to submit a post-construction assessment to report on the development's actual WLC emissions.

### ***Reducing Waste and supporting the Circular Economy***

- 6.9.18 Policy SI7 (Reducing waste and supporting the circular economy) of the London Plan sets out that referable applications should promote

circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
- 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- 3) opportunities for managing as much waste as possible on site
- 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
- 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- 6) how performance will be monitored and reported.

6.9.19 The adoption of circular economy principles for referable applications means creating a built environment where buildings are designed for adaptation, reconstruction and deconstruction. This is to extend the useful life of buildings and allow for the salvage of components and materials for reuse or recycling. Un-used or discarded materials should be brought back to an equal or comparable level of quality and value and reprocessed for their original purpose (e.g. recycling glass back into glass, instead of into aggregate).

6.9.20 In accordance with Policy 113 of the Local Plan Major development proposals will be required to implement Site Waste Management Plans to reduce waste on site and manage remaining waste sustainably.

6.9.21 This Application is accompanied by a Sustainability Statement and a Circular Economy Statement, prepared by HTA. The Sustainability Statement outlines a number of sustainability objectives that will be brought forward as part of the development and further identifies that to improve the sustainability of the development, the materials for the building will be responsibly sourced and the proposed development will seek to adopt a circularity approach to the reuse, recycle and conservation of materials and resources.

6.9.22 The Circular Economy Statement includes a Pre-Redevelopment Audit assessing the existing site, including any buildings, structures and materials and considering whether refurbishment of the existing buildings could be an option. It is welcomed that the Applicant has provided evidence of consideration of the refurbishment and repurposing options of the existing site, however the GLA have questioned whether:

1. Is it technically feasible to retain the building(s) in whole or in part?
2. Is it technically feasible to recover the 'residual value' of the building's elements or materials?

6.9.23 The GLA consider that the Circular Economy Statement does not yet comply with London Plan Policy SI 7 and 'sustainability' concerns

raised by local residents are not fully addressed. Despite this it is noted that the GLA are not objecting in principle to the demolition of the existing buildings and the decision to redevelop the estate is accepted. The Local Planning Authority are therefore of the view that the appropriate way to address the outstanding information is by way of an updated Circular Economy Statement which can be secured by planning condition.

6.9.24 An updated Circular Economy Statement along with a Site Waste Management Plan & Operational Waste Management Strategy should therefore be provided prior to the commencement of development on each phase. This will need to be secured through a pre-commencement condition.

6.9.25 A condition should also be secured requiring the applicant to submit a post-construction report (relating to Circular Economy).

## **6.10 Drainage and Flood Risk - Acceptable**

6.10.1 Policy SI13 of the London Plan states that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

6.10.2 Policy 116 (Sustainable Urban Drainage System) of the LBB Local Plan states that all developments should seek to incorporate Sustainable Urban Drainage Systems or demonstrate alternative sustainable approaches to the management of surface water as far as possible.

6.10.3 The application is accompanied by a The Flood Risk Assessment & Drainage Report carried out by PRICE & MYERS. The report identifies that the site is within Flood Zone 1 which is an area at low risk from flooding.

6.10.4 The report also considers the potential for flooding from other sources including Watercourse and Tidal Flooding, Groundwater, Surface Water and Overland Flows and Reservoirs. The Report concludes that there is a low risk of flooding from groundwater, and reservoir flooding.

6.10.5 The surface water drainage strategy for the Site will therefore be split into four separate networks. Each of the phases will therefore benefit from a separate connection to the public sewer at a restricted flow rate of 3.1l/s.

6.10.6 Sustainable Urban Drainage Systems will be provided within the Proposed Development in the form of green roofs, permeable paving, rain gardens, swales and below ground attenuation tanks. A pre-planning enquiry has been submitted to Thames Water who have confirmed that there is sufficient capacity in the existing sewers. The

Drainage Strategy therefore concludes that the proposed redevelopment of the Site is acceptable and the Drainage officer (Lead Local Flood Authority) has raised no objections, subject to the imposition of a pre-commencement drainage condition, for details of the proposed drainage strategy (in accordance with the submitted Flood Risk Assessment & Drainage Report) to be submitted to and approved by the LPA prior to the commencement of each phase.

6.10.7 In response to the comments raised by Thames Water in relation to the application, the applicant states that the surface treatment for the car parking areas will comprise of permeable paving which treats the run-off by removal pollutants and therefore there is no requirement for petrol interceptors to be installed in these location.

6.10.8 Further in relation to their comments relating to the proposed piling methods, the applicant does not consider that this is required due to the only section of the site within 15m of the strategic sewer being approximately 14.5m away and across a short stretch. The piles will be deeper than the sewer and therefore the applicant does not consider this would have an impact on the asset. Notwithstanding the above, it is acknowledged that the permission will be subject to a suitably worded condition securing the submission and approved of a piling method statement.

## **6.11 Environmental Health: Air quality / Contamination/ Lighting - *Acceptable***

### ***Air Quality***

6.11.1 Policy 120 of the Local Plan states that developments which are likely to have an impact on air quality or which are located in an area which will expose future occupiers to pollutant concentrations above air quality objective levels will be required to submit an Air Quality Assessment. Developments should aim to meet “air quality neutral” benchmarks in the GLA’s Air Quality Neutral report.

6.11.2 The site lies wholly within an Air Quality Management Area (AQMA) declared in 2007 for NO<sub>x</sub> where increased exposure to existing poor air quality should be minimised by avoiding introduction of potentially new sensitive receptors in such locations: particular attention should be paid to development proposals such as housing in this respect.

6.11.3 The proposed scheme will introduce new, highly sensitive (residential) receptors into the AQMA. Accordingly, the application is supported by an Air Quality and Air Quality Neutral Assessment prepared by IDOM, May 2022, Ref: AQA-21949N-21-430 REV A.

6.11.4 The Proposed Development is expected to generate a net increase of 182 vehicle movements as Annual Average Daily Trips (AADT). This is forecast to be split 50/50 along Southend Road to the north and south

of the site resulting in a maximum increase of 91 trips on any one road link. The report has stated further that an increase of this magnitude is below the indicative criteria set out in the IAQM guidance for schemes situated within, or adjacent to, an AQMA (>100 vehicles as AADT flows for light-duty vehicles (LDVs)) which would trigger the requirement for further assessment. The report therefore has not provided a detailed modelling of traffic impacts as a consequence. This is acceptable. Should there be any increase in parking provision at the site, a detailed air quality modelling of traffic impacts would be required.

- 6.11.5 Dwellings in Phase 1 will be fed directly via individual ASHPs and the accommodation on the remaining phases will be fed by a centralised energy centre consisting of gas boilers and ASHPs. The energy centre will include 3 No. Wessex ModuMax mk3, 196 kW gas-fired boilers with NOx emissions of 39.9 mg/kWh.
- 6.11.6 The estimated transport and building emissions associated with the Proposed Development are identified as well below the benchmark figures and the scheme can therefore be considered 'air quality neutral' in accordance with policy 120.
- 6.11.7 While the report concludes that the scheme can be considered 'air quality neutral' overall and that no further action is required in terms of mitigation/offsetting, mitigation measures should be followed for both the operational and construction phase. A CEMP should be produced which includes dust mitigation measures. This is required by condition. Conditions relating to the use of ultra-low NOx boilers, the provision of electric vehicle charging spaces and Non-Road Mobile Machinery to comply with the emission standards in the GLAs 'Control of Dust and Emissions During Construction and Demolition' dated July 2014 (SPG) or any subsequent guidance are also recommended.

### ***Contaminated Land***

- 6.11.8 The application is supported by a Geo-Environmental Assessment, prepared by IDOM, dated May 2022, Report Ref: GEA-21949N-21-357. The Phase 2 site investigation was devised in accordance with the findings of the Phase 1 investigation in order to test and refine the preliminary conceptual site model and risk assessment. An intrusive investigation was carried out by IDOM on 12 and 13 August 2021.
- 6.11.9 With regards to contamination, limited contamination during the Phase 2 investigation was identified, comprising of lead and PAHS, along the western boundary of the Site. Ground gas was also identified. In light of the contamination identified, the Geo-Environmental Assessment identifies remediation methods which include the provision of clean cover in area of public open space and private gardens or nominal dressing of topsoil in areas where site preparations have removed the shallow made ground soils. BS8485 (2015) has been followed to

assess the recorded soil gas and flow conditions and it was considered that no gas measures were required.

6.11.10 Further inspection and testing were recommended to be conducted beneath the existing building following their demolition for contamination, particularly asbestos.

6.11.11 A Contaminated Land condition is recommended in order to allow for additional inspection and testing to be conducted after demolition of the existing buildings, before the final submission of the remediation strategy is provided. This will need to refer to the phased approach.

### ***Lighting***

6.11.12 The lighting scheme presented in the Light Strategy by 'It Does Lighting', dated June 2022 has been designed to meet the guidance from the Institute of Lighting Professionals, 'The reduction of obtrusive light' Guidance Note 01/21, with respect to the sites lighting environment not exceeding 2 lux at any habitable window, meeting the illuminated limits on surrounding premises for an E3 Medium Brightness zone.

6.11.13 The report has confirmed that limits will be met at the residential windows within the development as well as outside, where lighting falls well below the guidance levels. The proposed scheme is accepted on Pollution Control grounds. As discussed in the ecology section above, a lighting condition is necessary to ensure there would be no impact on bats.

## **6.12 Other Matters**

### ***CIL & S106***

6.12.1 The London Borough of Bromley Community Infrastructure Levy (CIL) proposals were approved for adoption by the Council on 19 April 2021, with a date of effect on all relevant planning permissions determined on and after 15 June 2021. The Mayor of London's CIL is also a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

6.12.2 BLP Policy 125 and the Council's Planning Obligations SPD state that the Council will, where appropriate, enter into legal agreements with developers, and seek the attainment of planning obligations in accordance with Government Guidance.

6.12.3 Officers have identified a number of planning obligations which are considered necessary to mitigate the impacts of this development, the reasons for which have been set out in this report. Officers consider that these obligations meet the statutory tests set out in Government

guidance, i.e. they are necessary, directly related to the development and are fairly and reasonably related in scale and kind to the development. The proposed heads of term to be included in the S106 legal agreement are listed in Table 6 of this report.

6.12.4 At the time of writing, the applicant has not agreed in principle to all of the proposed heads of term and further clarification is sought on how the contributions linked to the pedestrian and cycling improvements have been calculated. Following further discussion with the Council's Highways department, Members will be updated verbally at the meeting.

### ***Environmental Impact Assessment (EIA)***

6.12.5 The Council issued an EIA screening opinion on the 16<sup>th</sup> September 2022 which confirmed that the proposed development is not "EIA development" within the meaning of the 2017 Regulations and, taking into account the selection criteria in Schedule 3 of the Regulations and the terms of the European Directive, would not be likely to have significant effects on the environment generating a need for an EIA.

## **7. CONCLUSION AND PLANNING BALANCE**

- 7.1 The application involves the demolition of the existing buildings and the comprehensive, phased redevelopment of the estate to provide replacement affordable homes, the net gain of 71 residential dwellings and an uplift in affordable housing when measured by floorspace and habitable rooms, representing a significant contribution to the supply of housing within the Borough.
- 7.2 The replacement affordable homes will be of a modern specification and all existing social tenants with a right to return would be offered a new home within the redeveloped estate, retaining the same tenancy rights and paying the same levels of rent.
- 7.3 The proposed development will provide accessible and adaptable, dual-aspect homes, all with good levels of sunlight and daylight and access to private outdoor space and the use of planning conditions will enhance the quality of the development and enable it to proceed by mitigating any adverse effects of road traffic noise to provide a good standard of accommodation for future occupiers.
- 7.4 The proposed landscape strategy encouraging social interaction and community cohesion, the provision of dedicated on-site playspace for children of all age groups and the ecological enhancements are also notable benefits of the scheme.

- 7.5 Whilst the principle of demolition and the opportunity to redevelop the site and replace ageing buildings which currently provide a poor standard of accommodation is considered acceptable in principle, an updated Circular Economy Statement will be required to fully address policy SI 7 of the London Plan and ensure the proposed buildings are designed for adaptation, reconstruction and deconstruction.
- 7.6 In terms of design there would be a notable step change in scale/height of the blocks compared to the existing estate, however, overall the proposal responds well to the surrounding context, ensuring a gradual transition in scale between the existing 10 storey towers to the west (Porchester Mead) and the open park setting to the east, helping to minimise any impact on the visual amenity and character of the adjacent designated MOL.
- 7.7 Furthermore, the development would not give rise to any significant overlooking, loss of privacy or loss of light to occupiers of surrounding residential sites.
- 7.8 Whilst the concerns of local residents in respect of insufficient car parking and impact on road safety are acknowledged, subject to the recommendations set out in this report, the application demonstrates that there would be no unacceptable impacts on highway safety, nor would the residual cumulative impacts on the road network be severe. Furthermore, the development would promote sustainable transport modes including walking and cycling, use of ultra- low emission vehicles, car sharing and public transport.
- 7.9 Taking the above into account, it is considered that the less than substantial harm to the significance of the designated heritage assets (to which great weight is given) would be clearly outweighed by the public benefits of the development and this would not provide a clear reason for the refusal of planning permission.
- 7.10 Furthermore, given the Councils' inability to currently demonstrate a five-year housing land supply and applying the presumption in favour of sustainable development in paragraph 11 of the NPPF, on balance, it is concluded that the scheme would not give rise to any adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 7.11 The Section 106 agreement will include viability review mechanisms so that, if the viability of the scheme improves sufficiently during the delivery of the scheme, additional on-site affordable housing or an equivalent offsite payment will be due.
- 7.12 This planning application has been processed and assessed with due regard to the Public Sector Equality Duty. The application proposals are not considered to conflict with the Duty.

7.13 Accordingly, the application is recommended for permission, subject to the prior completion of a S106 legal agreement and any direction from the Mayor of London.

**RECOMMENDATION      PERMISSION SUBJECT TO S106 LEGAL  
AGREEMENT AND ANY DIRECTION BY THE  
MAYOR OF LONDON**

### **SUMMARY OF CONDITIONS AND INFORMATIVES**

- Time limit of 3 years
- Compliance with approved drawings
- Slab levels
- Construction and Environmental Management plan
- Construction Logistics Plan
- Contaminated Land
- Circular Economy Statement
- Post-construction Circular Economy report
- Site Waste Management Plan & Operational Waste Management Strategy
- Lighting Scheme
- Tree Protection
- Landscaping Scheme
- Landscape and Ecological Management Plan
- Biodiversity Enhancements
- Digital connectivity infrastructure
- External Materials / samples
- Noise Mitigation
- Mechanical Heat and Ventilation Recovery details
- Safeguarding future connection to district heating network
- Updated energy assessment including PV layouts
- Refuse Storage
- Cycle Storage
- Secure by Design
- Fire Safety
- Obscure glazing
- Parking Design and Management Plan
- Travel Plan
- Delivery and Servicing Plan
- Cycle Management Plan
- Visibility Splays
- S278 Works
- Drainage
- No piling/piling method statement
- Whole life cycle carbon reporting
- Wheelchair units
- Car Parking as approved

- **Electric Vehicle charging spaces**
- **Low NOx Boilers**
- **Non-road Mobile Machinery**
- **Water usage**
- **Adherence to the recommendations in the Ecological Assessment**