

<b>Committee Date</b>	13.06.2024	
<b>Address</b>	40 Croydon Road West Wickham BR4 9HR	
<b>Application Number</b>	23/02065/FULL1	<b>Officer</b> - Russell Penn
<b>Ward</b>	Hayes And Coney Hall	
<b>Proposal</b>	Demolition of existing single storey structure, reconfiguration of side car parking provision, incorporating additional parking/accessible spaces; an EV charging bay; installation of traffic control raising arm barrier systems to the Croydon Road access. Removal of existing entrance canopy and construction of new entrance lobby structure. Installation of security fencing to side compound area; with the incorporation of vehicle access and pedestrian gates. Enclosure of the existing side under-croft and rear compound areas. New fenestration arrangement introduced to first floor level fronting onto Kingsway.	
<b>Applicant</b>	<b>Agent</b>	
Mr Mark Craft	Mr James Todd	
19 Colonial Way Watford WD24 4JL	2 Hallam Road Priory Park East Kingston Upon Hull HU4 7DY	
<b>Reason for referral to committee</b>	<b>Call-In</b>	<b>Councillor call in</b>
	Call-In	Cllr Alexa Michael - In summary, general concern about traffic safety and speeding in the immediate area with motorists 'cutting through' the Wickes forecourt and speeding on to the small strip of Croydon Road. Opportunity to improve traffic safety and reduce speeding at this location.

<b>RECOMMENDATION</b>	Application Permitted
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**KEY DESIGNATIONS**

Article 4 Direction  
 Biggin Hill Safeguarding Area  
 London City Airport Safeguarding  
 Locally Listed Building  
 Smoke Control SCA 51

**Land use Details**

	Use Class or Use description	Floor space (GIA SQM)
Existing	Use Class E - Commercial, Business and Service	2693m <sup>2</sup>
Proposed	Use Class E - Commercial, Business and Service	2905m <sup>2</sup>

<b>Vehicle parking</b>	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	28	34	6
Disabled car spaces	1	2	1
Cycle	0	16	16

**Electric car charging points**

One electric vehicle charging point provided.

**Representation summary**

Neighbour letters were sent out on 07/06/2023.

An Article 13 site notice was displayed on the site on 12/06/2023

Total number of responses

4

Number in support

0

Number of objections

4



- 2.1 The application site (No. 38 to 40 Croydon Road) is located to the southern side of Croydon Road (A232 – Red Route). The site adjoins a pair of semi-detached houses and a Thames Water balancing pond to the west. To the east of the site is a row of three storey mixed use buildings on Kingsway. The rear of the site are the rear gardens of No.2 South Walk, No.2 Church Drive and No.1 to No.4 Kingsway House.
- 2.2 The site comprises a detached single storey building located to the front of the Thames Water balancing pond, a part two and part three storey Locally Listed building with various late additions and extensions attached to the top, rear and side of the locally listed building. There are external plants and telecommunication equipment located at the roof levels of the locally listed building.
- 2.3 The Locally Listed building is occupied as a DIY retail shop with a warehouse storage area to the rear. The first floor of the building is currently vacant and was last occupied in July 2019 as an office and day care centre by the National Autistic Society (Class E). The second and third floors are also vacant office use. Previously occupied by M-Media, up until January 2022. At roof level there is plant and equipment, installations.
- 2.4 The existing car park to the front of the site, immediately adjacent to Croydon Road (A232), is accessed from both ends via Kingsway and Croydon Road. Both entrances provide vehicular and pedestrian access through the site.
- 2.5 The former public toilet located in the forecourt of the site, was last operated as an independent office.
- 2.6 The application site forms part of the shopping frontage of Croydon Road, Coney Hall Neighbourhood Centres and Shopping Parade.
- 2.7 The public transport accessibility of the site is rated at 2, on a scale between 0 to 6b where 0 is worst and 6b is excellent.
- 2.8 The site lies within Flood Zone 1 meaning the site has a low probability of flooding from river tidal sources.
- 2.9 The site is not located within a conservation area. The two-storey main building (ground and first floor) is locally listed. There are no other listed buildings in the vicinity.

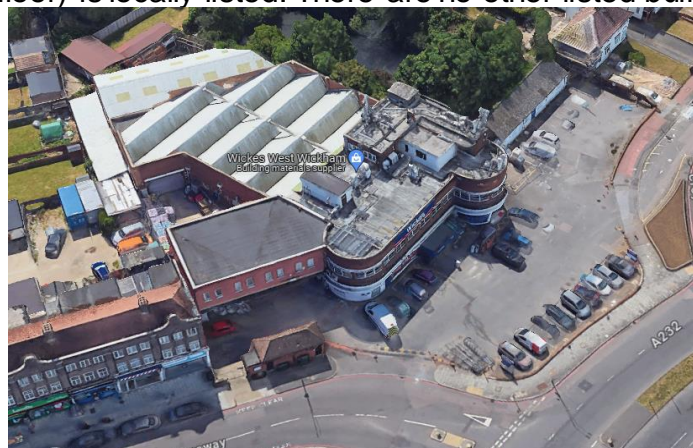


Figure 2: Aerial View - Existing

### 3 PROPOSAL

3.1 Planning permission is sought for the demolition of the existing single storey structure, reconfiguration of site car parking provision, incorporating additional parking/accessible spaces; an EV charging bay; installation of traffic control raising arm barrier systems to the Croydon Road access

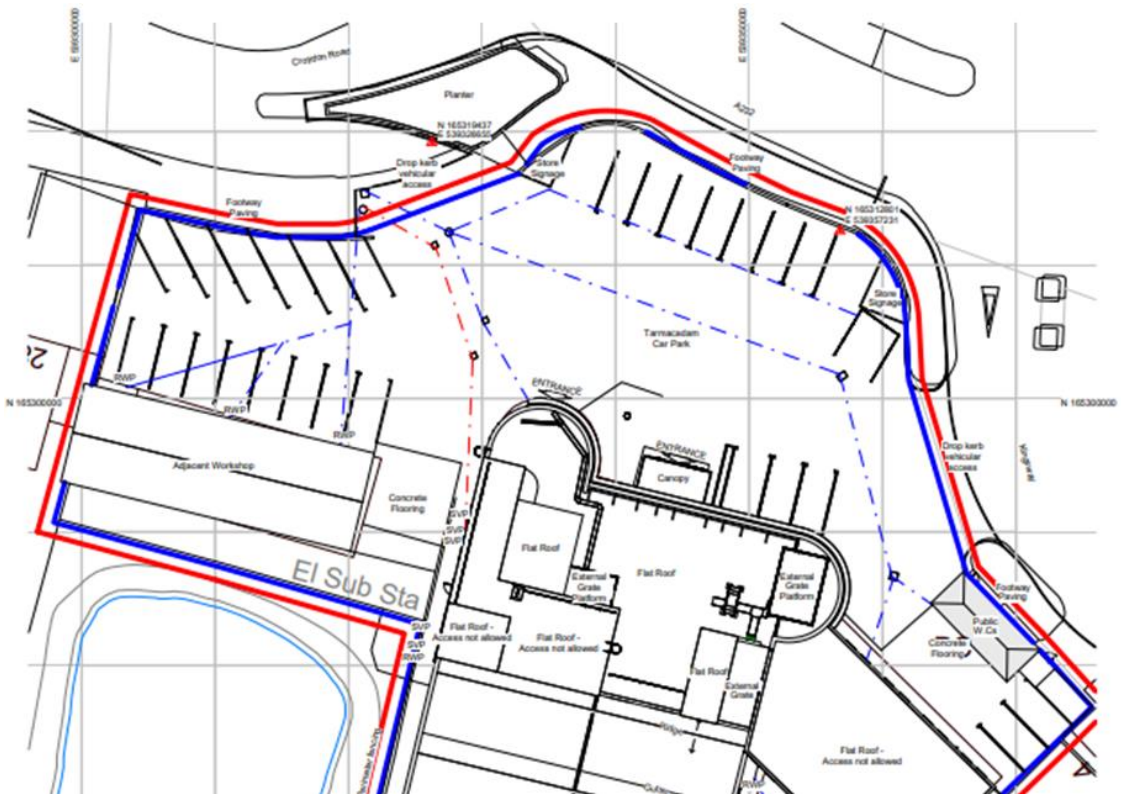


Figure 3: Existing car park

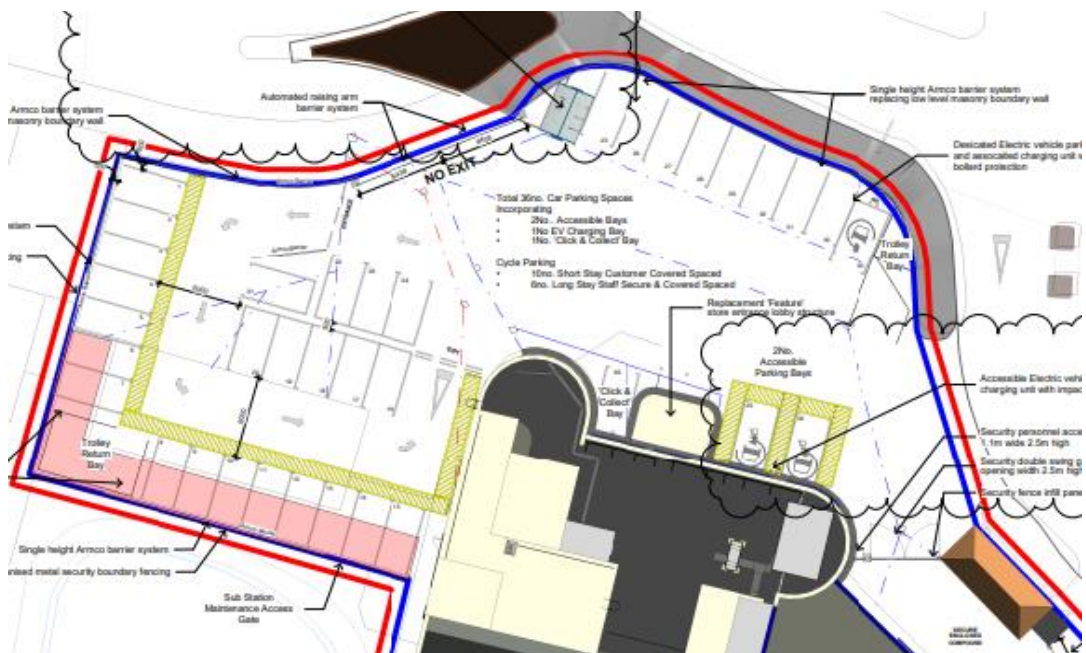


Figure 4: Proposed car park

- 3.2 The number of car parking spaces is proposed to increase to 36 incorporating two accessible bays, one electric vehicle charging bay, and one click and collect bay.
- 3.3 The existing outbuilding will be demolished.



Figure 5: Existing Outbuilding will be demolished

- 3.4 Planning permission is also sought for the removal of existing entrance canopy and construction of new entrance lobby structure.



Image 6: Entrance Canopy As Existing



Image 7: Entrance Lobby As Proposed

Figure 6: Existing and Proposed Entrance Canopy

- 3.5 Further works include the installation of security fencing to the side compound area with the incorporation of vehicle access and pedestrian gates. Enclosure of the existing side under-croft and rear compound areas.

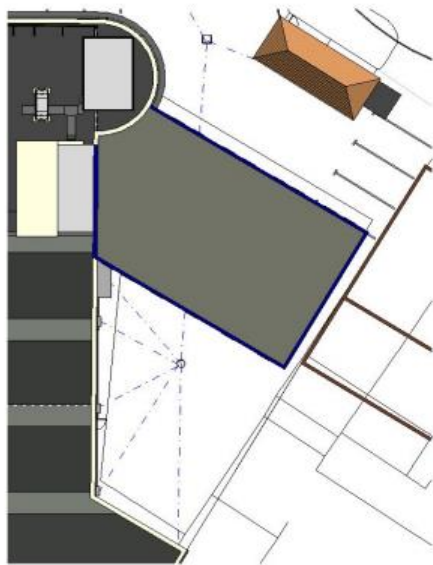


Image 8: Side Compound & Undercroft (Existing)

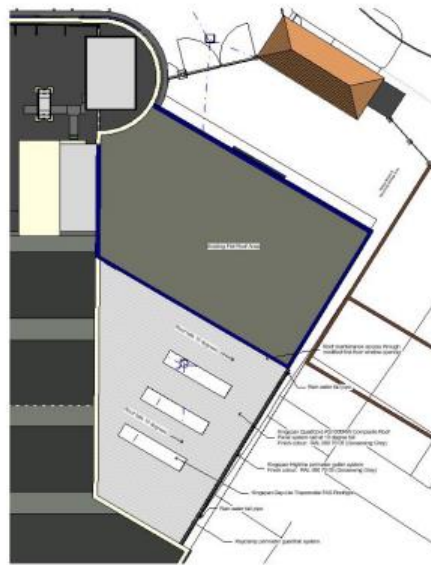


Image 9: Side Compound & Undercroft (Proposed)

Figure 7: Existing and Proposed side compound and undercroft



Figure 8: Location of proposed gates

3.6 Finally, a new fenestration arrangement is introduced to first floor level fronting onto Kingsway.



Image 10: Fenestration(Existing)



Image 11: Fenestration (Proposed)

Figure 9: Existing and Proposed Fenestration Arrangements

3.7 The application was supported by the following documents:

- Planning and Heritage Statement
- Transport Technical Note March 2024

## **4 RELEVANT PLANNING HISTORY**

4.1 The relevant planning history relating to the application site is summarised as follows:

- 4.2 83/01341/FUL: Change of use of buildings from brochure storage to Ancillary storage for adjoining diy centre. Approved 28.07.1983
- 4.3 96/02623/FUL: Change of use of first floor from offices to autistic day care centre. Approved 15.01.1997
- 4.4 97/00033/FUL: Change of use of second floor from residential flat to offices retrospective application. Approved 19.02.1997
- 4.5 11/02936/FULL1: External metal fire escape ladder to flank elevation. Approved 01.12.2011
- 4.6
- 4.7 18/02922/FULL1: Realignment and reconfiguration of existing car park to provide 31 parking spaces including two disabled spaces. Approved 13.09.2018
- 4.8 21/00091/FULL1: Demolition of existing warehouse and late additions to retail/office building (No.38 to No. 40 Croydon Road), retention and alteration to front façade and internal stair and erection of part 3 to part 5 mixed use development with basement, ground floor comprising of two retail units (Use Class E(a)) and community unit (Use Class E(a)/F) and 61 residential units at upper floors. Associated car parking, public realm and associated works. Approved subject to Legal Agreement 14.09.2022

## **5 CONSULTATION SUMMARY**

### **A) Statutory**

#### Environmental Health Pollution Officer – No objection

- Standing advice received. Officers consider noise pollution and air quality to be the main considerations at this site. Conditions recommended for further information in relation to any gas boilers being low NOx and a submission of a Construction and Environmental Management Plan.

#### Drainage Officer – No objection

- No comment.



#### Highway Authority Officer – No objection

- Croydon Road is part of Transport for London Road network. The access to the site is via Kingsway which is a LBB road. The site is located in PTAL rate of 2 on a scale of 0 – 6b, where 6b is the most accessible.
- The applicant was asked to submit a drawing showing the Swept Path Analysis of vehicles overlaid on the proposed site layout to demonstrate that the vehicles can manoeuvre safely and efficiently within in and out of site layout. I have now seen the Swept Path Analysis and am satisfied with it.
- The previous application 18/02922/FULL1, was for 31 car parking spaces whereas this application is for 35 parking spaces. I have reviewed my initial concern regarding intensification of the use of existing entrance from Kingsway close to Croydon Road. I feel that the proposals would not expect to have any significant detrimental impacts on the operation of the A232. However, as there is a barrier with the new parking layout and all the customers will use the access from Kingsway for entrance and exit so TfL should be consulted once again as they are the highway authority.

#### Tree Officer – No objection

- I do not object to the proposals. The previous scheme 21/00091/FULL1 had outlined tree constraints and the losses were not forming a reason for refusal.

#### Transport for London – No objection

- TfL have no further comment.
- Note: The above final comment from TfL is expanded upon in the Highways section of this report below.

### **B) Local Groups**

#### Bromley Biodiversity Partnership:

- Bromley Biodiversity Partnership has commented and raised issue with the loss of the area of land indicated as reclaimed with the removal of vegetation and relocation of boundary fencing. It is commented that the loss of this vegetation would result in a large local biodiversity loss in a very urban area and cause a reduction in ecosystem services including carbon uptake by existing mature/semi mature trees and other vegetation and protection of soil biodiversity and therefore soil structure and water retention. It is further opined that there are no documents supplied with this planning application which mention any kind of mitigation for biodiversity, any biodiversity net gain or any attempt to lower carbon losses such as through the use of solar panels.

## C) Adjoining Occupiers

### Highways and parking (addressed in para 7.3)

- Comments that the closure of the exit to Croydon Road will increase use of Kingsway as entrance/exit and result in queueing and potential highway issues.
- New car parking layout will appear more industrial.

### Support

- It is beneficial for the building to have a face lift.

## 6 POLICIES AND GUIDANCE

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

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

6.2 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that the determination must be made in accordance with the development plan and any national development management policies taken together, unless material considerations strongly indicate otherwise..

6.3 The National Planning Policy Framework was revised and published on 19th December 2023. The development plan for Bromley comprises the London Plan (March 2021) and the Bromley Local Plan (January 2019). The NPPF does not change the legal status of the development plan.

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

### 6.5 National Planning Policy Framework 2023

### 6.6 London Plan 2021

- D1 London's form and characteristics
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of change
- D14 Noise
- E4 Land for industry, logistics and services to support London's economic function.
- E7 Industrial intensification, co-location and substitution

HC1	Heritage conservation and growth
G5	Urban greening
G6	Biodiversity and access to nature
G7	Trees and woodlands
SI1	Improving air quality
SI4	Managing heat risk
SI5	Water infrastructure
SI7	Reducing waste and supporting the circular economy
SI12	Flood risk management
SI13	Sustainable drainage
T2	Healthy Streets
T3	Transport capacity, connectivity and safeguarding
T4	Assessing and mitigating transport impacts
T5	Cycling
T6	Car parking
T7	Deliveries, servicing and construction

## 6.7 Bromley Local Plan 2019

30	Parking
32	Road Safety
33	Access for All
34	Highway Infrastructure Provision
37	General design of development
39	Locally Listed Buildings
83	Non-Designated Employment Land
77	Landscape Quality and Character
96	Neighbourhood Centres, Local Parades and Individual Shops
112	Planning for Sustainable Waste management
113	Waste Management in New Development
115	Reducing flood risk
116	Sustainable Urban Drainage Systems (SUDS)
117	Water and Wastewater Infrastructure Capacity
118	Contaminated Land
119	Noise Pollution
120	Air Quality
121	Ventilation and Odour Control
122	Light Pollution
123	Sustainable Design and Construction
124	Carbon dioxide reduction, Decentralise Energy networks and Renewable Energy

## 6.8 Supplementary Planning Guidance

National Design Guide – (September 2019)

## 6.9 Bromley Supplementary Guidance

Urban Design Guide - Supplementary Planning Document (July 2023)

DG2: Preserving and Enhancing Heritage Assets  
DG5: Architectural Design  
DG6: Materials and Detailing  
DG11: Landscape Design  
DG14: Inclusive Design  
DG20: Sustainable Design

## **7 ASSESSMENT**

### **7.1 Land use**

7.1.1 Policy 83 of the Bromley Local Plan explains that the Council will seek improvements to the quality and quantity of employment floorspace on sites containing employment uses outside designated SILs and LSISs.

7.1.2 The alterations to the building will facilitate the implementation of an improved business floorspace use as per the existing use of the property. Given the context of the mixed residential and commercial uses in the immediate vicinity, the principle of the minor extensions, alterations of the existing building on the site together with external car parking improvements is considered acceptable subject to an assessment of the impact of the proposal on the appearance/character of the locally listed building and surrounding area, the residential amenity of nearby residential occupiers, car parking and traffic implications, sustainable design and energy, community safety and service/refuse arrangements

### **7.2 Design and Heritage Impacts - Acceptable**

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

7.2.2 Paragraph 131 of the NPPF (2023) states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

7.2.3 Paragraph 135 of the NPPF (2023) requires Local Planning Authorities to ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of

amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- 7.2.4 The NPPF sets out in Section 16 the tests for considering the impact of a development proposal upon designated and non-designated heritage assets. In this case the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application under Para 209 of the NPPF. 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.
- 7.2.5 London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.
- 7.2.6 Policy D3 of the London Plan relates to ‘Optimising site capacity through the design-led approach’ and states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Form and layout should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape. The quality and character shall respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.
- 7.2.7 Policy D4 of the London Plan outlines the various methods of scrutiny that assessments of design should be based on depending on the level/amount of the development proposed for a site.
- 7.2.8 Policy D5 of the London Plan relates to ‘Inclusive Design’ and states that development proposal should achieve the highest standards of accessible and inclusive design.
- 7.2.9 Policy HC1 part D of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 7.2.10 Policy 37 of the Local Plan details that all development proposals, including extensions to existing buildings, will be expected to be of a high standard of design and layout. To summarise developments will be expected to meet all of the following criteria where they are relevant; be imaginative and attractive to look at, of a good architectural quality and should complement the scale, proportion, form, layout and materials of adjacent buildings and areas; positively contribute to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks or landscape features; create attractive settings; allow for adequate daylight and sunlight to penetrate in and between buildings; respect the amenity of occupiers of neighbouring buildings and those of future occupants; be of a

sustainable design and construction; accessible to all; secure; include; suitable waste and refuse facilities and respect non designated heritage assets.

7.2.11 Policy 39 of the Local Plan details buildings on the Local List are considered to be non-designated heritage assets in the National Planning Policy Framework (NPPF). A proposal to alter, extend or for the change of use of a locally listed building will be permitted provided that it is sympathetic to the character, appearance and special local interest of the building and it respects its setting.

7.2.12 Guidance at DG2 of LB Bromley Urban Design Guide states that proposals shall demonstrate an understanding of the significance of heritage assets, setting and place, including their evidential, historical, aesthetic and communal value. Where a proposal will cause harm to a heritage asset, clear and convincing justification should be provided.

7.2.13 The existing building was originally designed as a car showroom in 1935 and was designed by English architects Leslie H. Kemp and Frederick E. Tasker. The building was listed between June 1975 and December 1982 in recognition of its historic and architectural merits.

7.2.14 The listing description states: -

*Large modernist motor garage building on corner of Croydon Road and Kingsway. Two storeys under a flat roof; red brick walls. A streamlined aesthetic is achieved by a linear built form with a curved corner to the left end and a curved forward return to right end. G/f was originally mostly open for motor vehicles with entrance doors to first floor accommodation on return at right end of façade. G/f is presently infilled with mid-late 20th C aluminium glazing with a projecting entrance canopy, both of no interest. Deep painted concrete fascia with projecting base and cornice between g/f and f/f adds to the streamlined effect. First floor dominated by linear windows gracefully following the curved walls and separated by simple brick piers. Windows have slender metal frames with two horizontal glazing bars creating three panes, flush brick cills and a projecting concrete drip mould over. The flat roof is concealed by a brick parapet with concrete coping. Later additions of no interest. Interior has very impressive Art Deco stairwell in terrazzo with a light fitting in the shape of a motor tyre. This led to the first floor restaurant which had a roof garden. Rest of interior not inspected.*

*To designs of Leslie Kemp & Tasker Architects, London. Bec. UDC Ref. 6921(1934). Called 'Kent's Finest motor garage' in a Morell's of Bromley Brochure of 1936. Original drawings show a f/f café with an orchestra stage and roof garden. The building retains much of its original external form and is worthy of inclusion on the local list.*

7.2.15 The locally listed building is considered as a landmark building in the area and is one of the few original Art Deco buildings remaining in the Borough. Since the building was occupied as a DIY store in 1977, a number of unsympathetic late additions and extensions have been constructed attached to the locally listed building with office accommodation and warehousing to the rear of the original building. At present there are a number of unattractive telecommunication equipment installed at the roof level.

7.2.16 In respect of the proposed physical alterations to the building, as detailed above, these would be clearly seen in the heritage context and from public viewpoints and adjacent viewpoints.

7.2.17 The Councils Conservation Officer has not raised a heritage objection to the proposals to the building. The proposals would represent an improvement in terms of the overall appearance of the building when compared with the existing condition of the building. As such, it is considered that the heritage merits of the proposal would outweigh any harm arising from this proposal in this instance.

7.2.18 As regards the alterations to the external car parking area, the revised layout and associated gates and minor structures are not considered to harm the heritage setting of the building.

### 7.3 Highways – Acceptable

7.3.1 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Paragraph 109 of the NPPF (2023) requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The NPPF clearly states that transport issues should be considered from the earliest stage of both plan making and when formulating development proposals and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

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

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

7.3.4 The main additional purpose of this proposed development is to improve the existing parking layout and egress arrangement. The vehicular access to the existing car park is via Kingsway with a secondary exit onto Croydon Road.

7.3.5 The car parking area currently has legal provision for 28 car parking spaces. It is stated that the aisle width between the perpendicular and echelon parking at the west of the site varies in width from 2.5m to 3.5m, which is not sufficient to accommodate a turning manoeuvre. Due to this, a maximum of 22 spaces are currently accessible at any one time.

7.3.6 It is proposed to increase the overall number of parking spaces to 36 spaces incorporating two accessible bays, one electric vehicle charging bay, and one click and collect bay. The principle of increased parking provision has been approved by

both the local highway authority and TfL under the 2018 full planning permission. This has been reviewed again and it is concluded that a minor increase in parking provision is acceptable within the relevant standards.

- 7.3.7 It is also proposed to close off the egress onto Croydon Road to eliminate the site being used as a rat-run. An automated raising arm barrier system in two raising sections of 6.438m each would be installed at the secondary exit. This is to allow egressing manoeuvres at Wickes discretion.
- 7.3.8 It is noted that neither the use nor the associated commercial and office floor space would be changed. A Transport Note including a traffic survey data and junction capacity assessment has been submitted in support for the proposed new parking and egress arrangement. The Transport Note indicates that there is an under provision of parking spaces due to a poor parking layout currently. The egress into Croydon Road is also often abused by drivers not visiting the store resulting in conflict between shoppers visiting the shop and road users driving through the car park. The general closure of the secondary exit would eliminate the issue of vehicles using the site as a rat run.
- 7.3.9 TfL has initially raised concern regarding to the performance and safety of Croydon Road which forms part of the Transport for London Road Network. The closure a secondary exit would have a potential impact in terms of additional vehicle movement at the junction between Kingsway and Croydon Road and further information was requested in a revised traffic survey to collate the turning counts and trip attraction. This was recorded in a survey in February 2024.
- 7.3.10 This assessment indicates that the uplift of vehicle movements at the junction between Kingsway and the A32 would see an increase in total vehicle trips of approximately 50% in the AM peak hour and 25% in the PM peak hour following the closure of the Croydon Road exit.
- 7.3.11 Due to the fact that traffic currently egressing onto Croydon Road does so to travel westbound only, it is forecast that all of the vehicle trips will route via the Kingsway / A232 junction. The 2018 planning application undertook a similar modelling assessment of the Kingsway / A232 junction which was accepted. The increase in vehicle trips at the junction presented under this assessment is less intensive than has previously been approved by TfL and LBB Bromley.
- 7.3.12 Two electric vehicle charging points would be installed in dedicated bays for the purpose. It is considered that this would be adequate for the number of additional spaces proposed. A planning condition requiring details of electric charging point is recommended.
- 7.3.13 The Council's Highway Officers and TfL Officers have raised no objections to the proposed parking layout and ingress/egress arrangements. As such, it is considered that the proposal would be acceptable in terms of layout and would not have an adverse impact on highway safety.



#### 7.4 Neighbouring Amenity – Acceptable

- 7.4.1 Policy 37 of the Bromley Local Plan seeks to respect the amenity of occupiers of neighbouring buildings and those of future occupants, providing healthy environments and ensuring they are not harmed by noise and disturbance, inadequate daylight, sunlight, privacy or by overshadowing.
- 7.4.2 The site is close to residential property to the east, west and south and there is a row commercial shop with residential flats above facing Kingsway. The development would increase the number of parking spaces from 22 to 36. However, there is no change in terms of the number of the retail unit capacity or floor area of the existing building. Given the proximity to the commercial parade and main road, it is considered that any noise or air pollution associated with this proposal would not be significantly different from the existing arrangement. As such, it is considered that the proposal would not have an adverse impact on the residential amenities enjoyed by the neighbouring properties.

#### 7.5 Sustainability – Acceptable

- 7.5.1 The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. London Plan and Local Plan Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions.
- 7.5.2 Paragraph 9.2.3 of the London Plan states that Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal) and use innovative building materials and smart technologies. This approach will reduce carbon emissions, reduce energy costs to occupants, improve London's energy resilience and support the growth of green jobs.
- 7.5.3 Local Plan Policy 123 states that all applications for development should demonstrate how the principles of sustainable design and construction have been taken into account.
- 7.5.4 An informative is recommended with any approval to ensure that the development strives to achieve these objectives. For a non major scheme, energy and water efficiency can only be secured under the building regulation regime as standard, in order to meet the requirements of Policies 123 and 124 of the Local Plan and Policy SI 2 of the London Plan.

#### 7.6 Sustainable Drainage – Acceptable

- 7.6.1 Policy SI 13 Sustainable Drainage of the London Plan states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 7.6.2 Policy 116 of the Local Plan details that all developments should seek to incorporate sustainable Urban Drainage Systems (SUDS) or demonstrate alternative sustainable approaches to the management of surface water as far as possible.

7.6.3 The building footprint or hard surfaced areas will not increase significantly except for the small area of land reclamation in the car park. Surface water drainage is shown to be integrated into the car parking area. The Councils Drainage Officer has not raised any concerns in this regard. Further details of the indicated drainage system is considered prudent to be sought by planning condition to prevent the discharge of surface water from private land on to the highway.

## 7.7 Air Quality - Acceptable

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

7.7.2 Policy 120 of the Local Plan states that developments which are likely to have an impact on air quality or which are located in an area which will expose future occupiers to pollutant concentrations above air quality objective levels will be required to submit an Air Quality Assessment.

7.7.3 The site is located within the Bromley AQMA (2020). Therefore, it is considered prudent for the development to incorporate Ultra Low NOx boilers as necessary. A condition is recommended in this regard with any permission

## 7.8 Green Infrastructure/Natural Environment - Acceptable

7.8.1 Paragraph 180 of the NPPF (2023) outlines that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

- Trees and landscaping

7.8.2 London Plan Policy G7 focuses on London's urban trees, setting out that development proposals should ensure that, wherever possible, existing trees of value are retained. If the removal of trees is necessary, there should be adequate replacement based on the existing value of the benefits of the trees removed.

7.8.3 Policy 73 of the Bromley Local Plan states that proposals for new development will be required to take particular account of existing trees on the site and on adjoining land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained.

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

7.8.5 The layout plans appear to indicate that there are eight trees in the land reclamation area of the site that would require removal to facilitate the scheme. It is noted that a different scheme to redevelop the site (ref 21/00091/FULL1) for housing also involved removal of these trees and no objection was raised in this regard.

7.8.6 Given the above material consideration the Council's Tree Officer has advised that there is no trees protected under any tree preservation order, no objection is raised in respect of any necessary works to remove these trees.

- Biodiversity Net Gain

7.8.7 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."

7.8.8 Under the Environment Act 2021, all development that falls under the Town and Country Planning Act 1990 requires that all planning permissions granted in England (with a few exemptions), have to deliver at least 10% biodiversity net gain (BNG) if submitted from 2nd April 2024.

7.8.9 While the commentary of BBP is noted in respect of the land indicated for reclamation into the site area at the rear of the demolished single storey structure, this application was received prior to the statutory requirement and is not required to achieve the BNG in law in the current transitional period.

## 7.9 CIL

7.9.1 The Mayor of London's CIL and the Borough CIL are material considerations. CIL is not payable on this application and the applicant has completed the relevant form.

## 8 **CONCLUSION**

8.1 Taking into account the above, the existing site and employment use will be retained in its entirety for commercial uses retaining the economic prosperity of the commercial premises which is deemed acceptable. The proposed development would have high quality design and would not have an unacceptable impact on the amenity of neighbouring occupiers. It is considered that the development would not be detrimental to the significance of the heritage asset of the locally listed building or the character and appearance of the locality.

8.2 The proposal would not have an adverse impact on the local road network, local parking conditions or an adverse impact on highway safety and residential amenities in the area, through the removal a secondary exit onto Croydon Road and realignment, reconfiguration of the private commercial parking layout to increase car parking provision at the site.

- 8.3 It is therefore recommended that planning permission is granted subject to the imposition of suitable conditions.
- 8.4 Background papers referred to during production of this report comprise all correspondence on the files set out in the Planning History section above, excluding exempt information

### **RECOMMENDATION: Application Permitted**

#### **Subject to the following conditions:**

- 1. Standard time limit of 3 years**
- 2. Standard compliance with approved plans**
- 3. Construction and Environmental Management Plan**
- 4. Details of lighting scheme.**
- 5. Details of highway drainage**
- 6. Details of materials.**
- 7. Parking arrangements to be installed as approved.**
- 8. Details of a servicing and delivery plan.**
- 9. Enclosed service compound area to remain in perpetuity.**
- 10. No mechanical works or operation of machinery allowed outside building or servicing compound area.**
- 11. No external storage on roofs of buildings.**

**Delegated authority be given to the Assistant Director: Planning & Building Control to make variations to the conditions and to add any other planning condition(s) as considered necessary.**

#### **Informatives**

- 1. Reminder regarding submission of pre commencement conditions.**
- 2. Land contamination monitoring**
- 3. Air quality neutral benchmarks.**