

Appeal Decision

Inquiry held on 10-13 January 2017

Accompanied site visits made on 11 and 13 January 2017

Unaccompanied site visits made on 10, 11 and 12 January 2017

by David Nicholson RIBA IHBC

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 21 March 2017

Appeal Ref: APP/G5180/W/16/3146806

Conquest House, 25 - 27 Elmfield Road, Bromley BR1 1LZ

- The appeal is made under section 78 of the Town and Country Planning Act (T&CPA) 1990 against a refusal to grant planning permission.
 - The appeal is made by Taylor Wimpey East London against the decision of the Council of the London Borough of Bromley.
 - The application Ref DC/15/03136/FULL1, dated 21 July 2015, was refused by notice dated 11 December 2015.
 - The development proposed is: Demolition of existing building and erection of a 12/13 storey mixed use building to comprise 881.5 sqm (GIA) commercial/retail floorspace at ground and part first floor level (Class A1/A2/A3/B1) and 69 residential units at upper floors (27 one bed, 31 two bed and 11 three bed), 46 car parking spaces, 132 cycle parking spaces, refuse stores and landscaping and other associated works¹.
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Decision

1. The appeal is dismissed.

Preliminary matters

2. The Council's decision notice contained four reasons for refusal (RfR). However, in a subsequent letter it confirmed that RfR4 was added in error. Following consultations, a Planning Statement Addendum and revised drawings were submitted in November 2015, prior to the Council's refusal and I have reached my Decision on the basis of the amended drawings.
3. I was told that the site notice wasn't posted until a few days before the Inquiry. While a matter for my discretion, as the usual procedure is to require these to be posted for 14 days I asked for it to remain up and said that I would accept further written representations until 18 January 2017. In the event, no further letters were received.
4. A Unilateral Undertaking was submitted under section 106 of the T&CPA (s106) that would provide affordable housing, and financial contributions towards: education, healthcare, a car club, and public realm works. The affordable housing would be a positive benefit (see below) but in other regards the contributions would be no more than mitigation and, as they would not alter my overall conclusion to dismiss the appeal, I have taken these no further.

¹ Following submission of the Planning Statement Addendum, this revised description was agreed in the Statement of Common Ground (SoCG).

5. Following receipt of closing submissions by the main parties, the Inquiry was closed in writing on Tuesday 24 January 2017.
6. The Government's Housing White Paper, entitled *Fixing our broken housing market*, was published on 7 February 2017 and I gave the main parties the opportunity to comment².

Main Issues

7. From all the evidence before me, and my inspections of the site and the surrounding area, I consider that the main issues are:
 - a) the effects of the proposals on the character and appearance of the area with particular regard to the height, scale and massing of the building;
 - b) the effects of the proposals on the living conditions of neighbouring residents, and;
 - c) whether the quality of design would meet the standards required for tall buildings by relevant planning policy.

Reasons

Character and appearance

8. Bromley High Street rises steadily through the town centre between Bromley South railway station and the Churchill Theatre. Elmfield Road runs parallel with the High Street, and follows its contours, as well as joining into it at both ends. The east side of Elmfield Road also slopes down towards the Kentish Way, an elevated bypass, beyond which is the Palace Estate. This is an area of mostly two storey semi-detached and terraced houses on slightly lower but fairly level ground to the east. The existing buildings in Elmfield Road currently range from around 4 to 10 storeys, with the taller Bank of America office buildings on the west side of the road. The kindest descriptions I heard for these were that they are banal, and of their time. I accept that these office developments are car-based and that, if proposed today, the public realm around them would not comprise good design.
9. The appeal site lies on the east side of Elmfield Road, opposite the Bank of America blocks, and slopes down several metres to the south and east. Palace View, the street alongside the site's southern boundary, is pedestrianised beneath the Kentish Way dual carriageway. The site is highly accessible with the highest but one Public Transport Accessibility Level of 6a. The existing building on the site was last used as offices and as a private members club. I saw that the office accommodation is of poor quality and was told that it remains vacant despite being actively marketed. It was common ground that redevelopment of the site is appropriate in principle.
10. The appeal followed on from an earlier one³ which was dismissed. Although I have determined the appeal before me afresh, and on its own merits, the findings of the previous Inspector are a significant material consideration. He found that Kentish Way defines a marked change in the character of the built form, and that the scheme would result in a perception of being overlooked albeit that any loss of privacy would not be determinative. His principal

² See Inquiry Documents (ID)22 and 23

³ Ref. APP/G5180/A/13/2210460, dated 24 July 2014

objection was that the excessive height would have an unduly overbearing effect on the living conditions of nearby residents.

11. The earlier scheme was made up of interlocking forms providing the block with a vertical emphasis which is typical of many free-standing towers. The previous Inspector found that in several views the scheme would bring positive benefits including a more balanced skyline from the south and some beneficial visual closure from the north. He found not only the fine proportions of the windows, the precise detailing of the inset balconies and the high quality materials used particularly notable, but also the neat way the various elements of the façade were crafted and fitted together. It was subsequently discovered that this was also the view of the design consultant for the Council⁴.
12. Having reviewed the information before me on the previous scheme, I find no reason to take issue with that Inspector's conclusion or that this meant it had been designed to the highest architectural standards. It was put to me that his assessment was based on the detailing of the elevations and that this has essentially been retained. However, in his conclusion he stated that: *The scheme ... would produce an intrinsically well designed building* and I cannot but think that, in stating this, he was referring to every aspect of its appearance. In particular, when viewed from the east, the three relatively slender interlocking forms would have had the effect of breaking down its apparent mass and producing an elegant composition that would have led to this conclusion.
13. The building proposed now would be quite a different shape to that before the previous Inspector. It would be composed of three main elements, a plinth of offices, a middle residential section and a slightly different top. Each element would also step back from the Palace Estate. The elevations have been redesigned and there have been changes to the facing materials. Compared with the previous design, the scheme before me would be significantly reduced in height but wider. The Greater London Authority (GLA) referred to this as 'truncated'. Rather than a tower of vertical forms, articulated through different facing materials and with fairly slender, elegant proportions, it would be significantly stockier. The east elevation would no longer provide that vertical interplay but, above the level of the Kentish Way, would be much more of a single entity.
14. The exception to this would be a substantial area of projection (or 'apron' in the Council's parlance) on the east elevation set down from the roof and set in slightly from both sides. It would be lighter in colour so that it would appear as something of a separate element framed by the rest of the block. However, unlike the proportions of the forms in the previous scheme, this feature would be roughly square facing onto Palace View reinforcing the bulk of this elevation as a whole and highlighting its stout proportions.
15. The scheme would include commercial floorspace on the lower floors, including a shop on the corner, with residential units above. The completed s106 Undertaking would deliver ten of these as shared ownership affordable housing units. There would be substantial changes to the pavements and underpass so that the public realm would be significantly improved. However, subject to viability, there is no reason why any redevelopment could not achieve the same goals and so I give these benefits limited weight.

⁴ Stewart Clark – See ID2

16. The Council argued that the new proposals had jettisoned the better elements of the design. The appellant countered this criticism by claiming that, in order to markedly reduce its impact, it would deliberately not present itself as a tower which would stand out against the skyline. This would be a valid approach to a block within a cluster of tall buildings where the overall outline is more important. Here, however, the separation from the existing tall blocks caused by Elmfield Road would bring the proposed building much closer when seen from Palace View and around so that it would dominate rather than appear as part of a group. While foreshortening would mean that the steps back at each change of element would reduce the apparent height in some views, they would not do so sufficiently to reduce its prominence. In the important approach to the town centre from the east, the building would retain a bulky, rectilinear profile which would stand out far more than the existing Bank of America blocks.
17. In short, when viewed from much of the Palace Estate, the building would appear too tall to be part of the cluster of existing office buildings and too stocky to be acceptable as a stand-alone tower. The design would fall between two stools being neither an elegant free-standing tower nor part of a group with an overall silhouette. Consequently, it would appear unattractive in some of the most critical and prominent views and cause substantial harm to the character and appearance of the area.
18. The appellant carried out the substantial rethink to the overall form, and to the east elevation in particular, in response to the insistence of councillors. However, the assessments of the previous scheme, not only by the Inspector but also by the Council's consultant, were that the design was of a good standard and that the issue of privacy, as opposed to overbearing height, should not be determinative. I therefore consider that the appellant's revised approach, of not just reducing the height but altering the proportions to remove the references to verticality, and of adding bay windows with obscure or opaque glass, concentrated on overcoming the wrong problems. As a result, while the scheme before me still brought objections from councillors and residents, it has lost many of the architectural and aesthetic advantages of its predecessor.
19. I accept that, in principle, a tall building would improve legibility at this pedestrian/cycle gateway into the town even though one can already see the tall buildings on the other side of Elmfield Road. However, as explained by the appellant, this would be as a result of the elevation beckoning the viewer towards it. It would therefore only be a benefit if it has an attractive façade. While I accept that the east elevation would be more appealing than the existing Bank of America blocks, it would still be unattractive in its context while being significantly more prominent. Other than the apron, when seen from the east there would be little articulation to break down the mass of the building as a whole, again resulting in an abrupt elevation that would be more likely to appear to confront the viewer than beckon them towards it.
20. I acknowledge that, as part of an opportunity area, the scheme could be followed by other, adjacent tall buildings, that the owner of the land to the north has expressed an interest in a joint scheme⁵, and that the lack of north facing single-aspect units would both benefit future residents and allow scope

⁵ See the representations for the owners of Kingfisher House at 21-23 Elmfield Road .

for this. However, at the Inquiry there was no indication that a wider redevelopment was likely or might be forthcoming in the foreseeable future. I therefore give this possibility limited weight.

21. For the above reasons, the combined height, mass and scale of the proposals relative to their context would cause significant and demonstrable harm to the character and appearance of the area. They would be contrary to saved policies BE1(ii) of the London Borough of Bromley's Unitary Development Plan 2006 (UDP) which requires that development should not detract from the existing street scene and should respect important views or skylines. The scheme would conflict with policy BTC19 of the Bromley Town Centre Area Action Plan 2010 (AAP) which accepts the potential for taller buildings in locations identified on the Key Diagram (which the appeal site is not) subject to integration with the surrounding area and impact on residential amenity. It would be contrary to policy in chapter 7 of the National Planning Policy Framework (NPPF) which requires good design.

Living conditions

22. The parties could not agree on the proposed number of storeys (as this depends on how one counts them) but it was agreed that the overall height of the proposed building would be reduced by some 10.5 metres, or around 3 storeys, compared with that at the last Inquiry, and so little more than a metre above the highest point of the Bank of America blocks. The reduction in height would mean that it would not be visible in some views compared with the previous scheme. As above, the stepping back of the elements, combined with foreshortening, would reduce the prominence from some locations. Nevertheless, given the proximity of the scheme to the Palace Estate, compared with the distance from the buildings on the west side of Elmfield Road, it would appear prominent.
23. The orientation of the streets means that few windows face directly towards the site although I saw from seated positions within three different houses⁶ that the outlook from these would still be significantly affected by the proposed building. There would be many more views from gardens⁷ where the proposed block, and its windows, would be readily apparent and in some cases would be likely to interrupt evening sunshine. Notwithstanding that many gardens are already overlooked by their neighbours, that the building height has been reduced, that the separating distances would be greater than those usually required for privacy, and that the lower floors would be largely obscured by the Kentish Way, I accept that the building's windows would still result in an uncomfortable outlook and sense of lost privacy to a majority of residents in and around the Palace Estate both during the day and when lit up at night.
24. The amended appeal scheme would introduce a series of triangular bay windows into the apron with obscured glass angled in the direction of most homes in the Palace Estate to maintain privacy. However, these would still read as substantial, glazed openings in the façade even if in practice they would make overlooking very difficult. From much of the Palace Estate, even in the reduced height scheme before me, I am in no doubt that the sight of large windows, whether of obscured glass or not, would be unwelcome and result in an uncomfortable sense of lost privacy, even if this could not be substantiated.

⁶ Nos. 7 and 16 Rafford Way and No.6 The Chase

⁷ Including that I saw at 5 Palace View

On the other hand, while the obscured glass would fail to overcome the identified harm, they would not add to it but be a neutral feature.

25. On this issue, taking the height and bulk of the building and the extent of fenestration together, the scheme would result in an unwelcome outlook and a sense of lost privacy and so harm the living conditions of many neighbouring residents on the Palace Estate. For a number of these the harm would be significant. It would be contrary to development plan and national policies which aim to protect residential amenity, including London Plan Policy 7.6 which, for tall buildings in particular, expects that buildings should not cause unacceptable harm to the amenity of residential buildings in relation to privacy; UDP Policy BE1(v), which expects development to respect the amenity of occupiers of neighbouring buildings and ensure their environments are not harmed by inadequate privacy; AAP Policy BTC17 which requires new development to protect existing residential amenity; and paragraph 17 of the NPPF which seeks to secure a good standard of amenity for existing occupants of buildings.
26. On the other hand, since its recent adoption under London Plan Policy 2.13 and Map 2.4, the site is now identified as within an Opportunity Area where capacity for new residential development should be promoted⁸ and is to be expected. Permissions in the same policy area of Bromley have been granted, on balance, with even less favourable relationships with existing houses⁹ and where previously there were no tall buildings in view. The Council conceded¹⁰ that, in the interests of consistency of decision making, all residents deserve the same treatment and respect but also rightly referred to the different circumstances including relative heights and setbacks.
27. I have studied the other permissions for tall buildings in the area but, as well as other significant differences, the taller of these have excellent sculptural qualities as well as going to considerable lengths to ameliorate the effects on neighbouring residential properties where possible and this also applies to the designer's other schemes¹¹.
28. While a location within an Opportunity Area should not be *carte blanche* for any development, it should weigh heavily in its favour. In my assessment this means that, unlike the position in the previous appeal, the extent to which the building would lead to an uncomfortable outlook and apparent loss of privacy should not be sufficient reason on its own to refuse planning permission but is one of a number of factors to be weighed in the balance.

Quality of design

29. The relevant design standards are set out in the London Plan, the UDP and the AAP. In particular, the criteria in London Plan Policy 7.7C include that tall buildings should relate well to the form, proportion, composition, scale and character of surrounding buildings, and incorporate the highest standards of architecture. Paragraph 7.27 adds that these should form part of a cohesive building group that enhances the skyline. UDP Policy BE17, for buildings which significantly exceed the general height of those in the area, expects a design of outstanding architectural quality that will enhance the skyline.

⁸ London Plan Annex One Table A1.1 p355

⁹ As brought to my attention prior to my unaccompanied visits – see ID12.

¹⁰ Reynolds in XX

¹¹ At Dunedin Road and elsewhere

30. AAP policy BTC19 acknowledges potential for taller buildings, where identified, subject to the guidance set out in the English Heritage/Commission for Architecture and the Built Environment's Guidance on Tall Buildings (2007), Although published with heritage assets in mind, English Heritage (as was) Advice Note 4 Tall Buildings, Dec 2015 (replacing the 2007 Guidance) is also relevant given its reference in policy BTC19. This endorses a development plan led approach to tall buildings which should be of excellent design quality.
31. The GLA found the proposals generally acceptable in strategic terms, and with regard to height, scale, massing and appearance, but also that the design would not fully comply. In the absence of any local design review arrangements, the appellant commendably organised its own peer review and, although this did not produce a formal letter of advice, the design director considered that it achieved a similarly high standard. As set out above, there are many commendable aspects to the detailing of the scheme which might contribute towards good design. Nevertheless, as a result of the unacceptable harm to the character and appearance of the area, I find that it would be significantly less successful in design terms than the scheme considered at the first appeal. The proposals would not amount to the highest standard of architecture, outstanding architectural quality that would enhance the skyline, or excellent design quality.
32. For all the above reasons, the scheme would not achieve the necessary quality of design set for tall buildings which is a high bar. It would therefore be contrary to London Plan Policy 7.7, UDP Policy BE17, and AAP Policy BTC19.

Other matters

33. Evidence with regard to housing land supply (HLS) was disputed. However, the parties agreed that, in the event that I found that the scheme would either cause no harm, or that it would cause significant and demonstrable harm, that there was no need to conclude on HLS. Given this, and that any finding I were to make with regard to HLS would need to be reviewed at any subsequent appeal in any event, I have not done so. Moreover, given the acceptability in principle to development on the site, there is no reason why there should not be high density development on the site in the future.
34. I acknowledge that for a revised proposal to be acceptable there might need to be a reduction in the floor area and that this might affect viability. However, given that the scheme as it stands can support a significant amount of affordable housing and other contributions, I am satisfied that there is scope for a viable alternative development that would not cause the significant and demonstrable harm to the character and appearance of the area that I have identified.

Planning balance

35. The scheme would provide a number of substantial benefits including a significant contribution towards meeting Bromley's identified housing and affordable housing needs at a highly accessible location where the extent of HLS is disputed. The scheme would protect existing levels of employment floorspace, contribute to reducing car journeys, provide inward investment, and make significant improvements to the currently sterile public realm between Elmfield Road and the Kentish Way underpass. These benefits would be

supported by a raft of development plan and other policies which promote new housing and optimising, or maximising, housing potential.

36. The appeal site is within the AAP boundary, as it was at the previous Inquiry, but is not identified as a possible location for a tall building. The previous Inspector found that, while not necessarily fatal to the appeal scheme, it was a distinct disadvantage. The site now also falls within the Bromley Opportunity Area, under a policy which was only emerging at the time of the previous Inquiry, which identifies¹² a minimum housing target. While these policies are not necessarily inconsistent, the location of the site within the Bromley Opportunity Area rather supersedes any implied disadvantage, referred to by the previous Inspector, from not being identified as a possible location for a tall building.
37. The scheme is also consistent with advice in the London Plan Housing Supplementary Planning Guidance to 'optimise' rather than simply maximise, housing potential which it defines as developing land to the fullest amount consistent with all relevant planning objectives. The emerging Local Plan (eLP) is a material consideration. While relevant, given its early stage¹³ the eLP should generally be given limited weight other than where it is in accord with the NPPF in which case it is enough to refer to the latter's policies until the eLP is adopted. The Housing White Paper is a material consideration which emphasises the need to deliver more housing, more quickly, and in appropriate locations. Its 'direction of travel' promotes housing delivery and so further strengthens the strong policy support that the appeal scheme enjoys.
38. Nevertheless, for the above reasons, I find that the harm that the proposals would cause to the character and appearance of the area, taken with the uncomfortable outlook, perceived loss of privacy and the failure of the design to attain the necessary quality to satisfy the policy requirements for tall buildings, would significantly and demonstrably outweigh the benefits, even if the Council cannot demonstrate a 5 year HLS. The scheme would be contrary to the development plan as a whole.

Conclusions

39. For the reasons given above, and having regard to all other matters raised including parking, highway safety, daylight, noise and lack of play space, I conclude that on balance the appeal should be dismissed.

David Nicholson

INSPECTOR

¹² London Plan Annex One Opportunity and Intensification Areas Table A1.1 p355, No.2 Bromley

¹³ The consultation period closed on 31 December 2016

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Gwion Lewis of Counsel	instructed by Mr. Ullman, solicitor, London Borough of Bromley (LBB)
He called	
Claire Glavin BA MRTPI	Principal Planning Officer, LBB
Amanda Reynolds BArch MA UD RIBA	AR Urbanism Ltd, London
Steven Sensecall BA DipTP MRTPI	Kemp & Kemp LLP, Abingdon-on-Thames

FOR THE APPELLANT:

James Strachan QC	instructed by Mr Edmonds
He called	
Andrew Mortimer BArch DipArch RIBA	RMA Architects
Dr Chris Miele BA MA PhD IHBC MRTPI FRHS	Montagu Evans, London
Will Edmonds BA DipTP MRTPI	Montagu Evans, London

INTERESTED PERSONS:

John Harvey	Palace Estate Residents' Association
John Rugg	Local resident
Cllr. Nicola Dykes	Ward Councillor, LBB
Stephen Holloway	Local resident
Tony Barfield	Bromley Civic Society
Trevor Harris	Local resident

INQUIRY DOCUMENTS

- 1 Unilateral undertaking, under s106 of the T&CP Act, dated 13 January 2017
- 2 CD92. Emails with regard to the 2014 appeal Decision
- 3 *Wain Homes* Judgment
- 4 Article 4 Direction for Bromley town centre withdrawing permitted development rights for office to residential conversions
- 5 Street sections B-B and C-C
- 6 Extract from the London SHLAA
- 7 Minute with regard to the Council's position on 5YHLS, November 2016
- 8 Additional clip of information on HLS; email 28 December 2016; reports items 15 and 16
- 9 Reynolds drawing corrections
- 10 Appellant's opening
- 11 Council's opening
- 12 Route of Inspector's unaccompanied site visits
- 13 Appeal Decisions APP/E5900/15/3130083 & 3130084, The Oval, London
- 14 Statements by interested parties
- 15 Additional comments by Mr Davis
- 16 Gross internal floor areas
- 17 Dunedin Road distances
- 18 Lapse rates

Submitted after all evidence had been heard

- 19 Planning permission for Ringers Road, dated 2008
- 20 Council's closing submissions
- 21 Appellant's closing submissions
- 22 Appellant's comments on the Housing White Paper
- 23 Council's comments on the Housing White Paper

CORE DOCUMENTS

CD01	Conquest House July 2014 Inspectors Decision	July 2014
CD02	Boundary and Site Plan	July 2015
CD03	Application Document Schedule	July 2015
CD04	Application Covering Letter	July 2015
CD05	Application for Planning Permission Form and Certificates	July 2015
CD06	Planning Statement	July 2015
CD07	Design and Access Statement (DAS)	July 2015
CD08	Townscape and Visual Impact Assessment	July 2015
CD09	Air Quality Assessment	July 2015
CD10	Noise and Vibration Report	July 2015
CD11	Archaeological Desk Based Assessment	July 2015
CD12	Daylight and Sunlight Report	July 2015
CD13	Energy Assessment	July 2015
CD14	Phase 1 Geo-Environmental Assessment	July 2015
CD15	Statement of Community Involvement	July 2015
CD16	Sustainability Statement	July 2015
CD17	Transport Statement	July 2015
CD18	Wind Microclimate Assessment	July 2015
CD19	Flood Risk Assessment	July 2015
CD20	BREEAM Report	July 2015
CD21	CIL Additional Information Form	July 2015
CD22	Planning Statement Addendum: Further Submissions (including an addendum to the DAS)	November 2015
CD23	Consultation Letter and Leaflet	June 2015
CD24	Existing Drawings:	July 2015
CD25	Application Drawings (submitted July 2015):	July 2015
CD26	Submitted July 2015 for information only:	July 2015
CD27	Updated as per Planning Statement Addendum: Further Submissions (13 November 2015)	13 November 2015
CD28	Updated as per email to Tim Horsman, 17 November 2015	17 November 2015
CD29	GLA Stage 1 Response	September 2015
CD30	LBB Decision Notice	December 2015
CD31	Letter from LBB dated 4 th January 2016	January 2016
CD32	LBB Committee Report	December 2015
CD33	LBB Committee Minutes	December 2015
CD34	The Appellant's Statement of Case	March 2016
CD35	LBB's Statement of Case	June 2016
CD36	Statement of Common Ground	December 2016
CD37	Cathedral Scheme Decision Notice and Committee Report	March 2012
CD38	Cathedral Scheme Design and Access Statement	December 2011
CD39	Cathedral Scheme TVIA	December 2011
CD40	Cathedral Scheme Elevations	December 2011 – January 2012
CD41	Westmoreland Road Committee Report	September 2013
CD42	Westmoreland Road Indicative Elevations	July 2013

CD43	Westmoreland Road Design and Access Statement	July 2013
CD44	Westmoreland Road Sketch Elevations	July 2013
CD45	HG Wells 2015 Appeal Decision	August 2015
CD46	HG Wells Committee Report	November 2014
CD47	HG Wells Design and Access Statement	October 2013
CD48	HG Wells Design and Access Statement Addendum	August 2014
CD49	HG Wells 2015 LBB Refusal Notice	January 2015
CD50	HG Wells 2015 Elevations	October 2013
CD51	HG Wells Colour Elevations	Oct 2013 – August 2014
CD52	HG Wells 2016 Design and Access Statement	May 2016
CD53	HG Wells 2016 Planning Statement	May 2016
CD54	HG Wells 2016 Elevations	2016
CD55	HG Wells 2016 Coloured Elevations	2016
CD56	HG Wells 2016 Summary of Changes from Approved Elevations	2016
CD57	HG Wells 2016 Refusal Notice	November 2016
CD58	Town and Country Planning Act	May 1990
CD59	Planning (Listed Buildings and Conservation Areas) Act 1990	May 1990
CD60	The National Planning Policy Framework (NPPF)	March 2012
CD61	National Planning Practice Guidance (NPPG)	Online resource
CD62	London Plan 2016	March 2016
CD63	Mayor's Housing SPG	March 2016
CD64	Accessible London: Achieving an Inclusive Environment SPG	October 2014
CD65	Character and Context SPG	June 2014
CD66	Town Centres SPG	July 2014
CD67	Sustainable Design and Construction SPG	April 2014
CD68	Laying the Foundations: A Housing Strategy for England	November 2011
CD69	A City for all Londoners	October 2016
CD70	LB Bromley Unitary Development Plan Saved Policies	2006
CD71	Bromley Town Centre Area Action Plan and Evidence Base	2010
CD72	LBB Proposed Submission Draft Local Plan	November 2016
CD73	LBB No 1 Design principles	2004
CD74	LBB No2 Residential Design Guidance	2004
CD75	LBB Planning Obligations SPD and addenda	Dec 2010, January 2012, June 2013 and June 2015
CD76	LBB Development Control Committee Report on 5-Year Housing Land Supply	24 November 2016
CD77	HM Treasury: Fixing the Foundations: Creating a More Prosperous Nation	July 2015
CD78	3 rd Edition – Guidelines for Landscape and Visual Assessment	April 2013
CD79	CABE and English Heritage Guidance on Tall Buildings	July 2007
CD80	Tall Buildings - Historic England Advice Note 4	December 2015
CD81	Design review – How CABE evaluates quality in architecture and urban design	2006
CD82	Design and Access Statement	April 2013
CD83	Townscape and Visual Impact Assessment	April 2013
CD84	Planning Statement Addendum: Further Submissions	August 2013
CD85	Application Drawings (April 2013)	April 2013
CD86	Updated as per Planning Statement Addendum: Further Submissions (August 2013)	August 2013
CD87	Updated Post PRP Peer Review (March 2014)	March 2014
CD88	LBB Committee Report	September 2013
CD89	Baseline Photos	March 2014
CD90	CGIs – Addendum Information	March 2014
CD91	CGIs – Post Peer Review	March 2014