

APPENDIX A.9 BLENHEIM SHOPPING CENTRE COMMITTEE REPORT

Committee Date	5 th March 2024	
Address	Blenheim Shopping Centre High Street Penge London SE20 8RW	
Application number	23/00178/FULL1	Officer Agnieszka Nowak-John
Ward	Penge and Cator	
Proposal (Summary)	Phased development including demolition of existing buildings and erection of four blocks to facilitate a mixed-use development providing up to 230 dwellings, up to 2,714sqm of commercial/town centre floorspace and associated communal amenity space and play space, cycle parking, refuse storage and plant space in four buildings ranging between 3 and 16 storeys. Provision of public realm and new pocket park at ground floor with associated landscaping improvements. Provision of 24 commercial car parking spaces and 8 blue badge spaces for the residential accommodation.	
Applicant	Agent	
Hadley Penge LLP	Rolfe Judd Planning Ltd	
Reason for referral to committee	Major Development 20+ new dwellings	Councillor call in No

RECOMMENDATION	PERMISSION SUBJECT TO ANY DIRECTION BY THE MAYOR OF LONDON
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Summary

<p>KEY DESIGNATIONS</p> <ul style="list-style-type: none"> • Conservation Area • Biggin Hill Safeguarding Birds • Biggin Hill Safeguarding Area • London City Airport Safeguarding • Renewal Area • Smoke Control • Town Centre Boundaries • Primary Shopping Frontage • Views of Local Importance
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Land use Details		
	Use Class or Use description	Floor space (GIA SQM)
Existing	Commercial (Class E)	4,416
Proposed	Commercial (Class E) Residential (Class C3)	2,714 19,545 (230 units)

Residential Use – See Affordable housing section for full breakdown including habitable rooms					
	Number of bedrooms per unit				
	1	2	3	4 Plus	Total
Market	73	84	0	0	157
Affordable (shared ownership)	25	12	0	0	37
Affordable (social rent)	3	20	13	0	36
Total	101	116	13	0	230

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Commercial	- 88 (multi-storey car park)	24 (commercial) - including 2 Car club/ EV charging; 1 EV charging and 2 Blue Badge	- 64
Residential	-	8 Blue Badge	+ 8
Cycle	0	Residential:414 long stay 14 short stay (428) Commercial: 22 long stay and 82 short stay (104)	+428 +104

Electric car charging points	20% active and 80% passive
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Representation summary	<p>The application has been consulted previously in January and February 2023.</p> <p>The re-consultation of the amended application included neighbour consultation letters sent on 12/01/24, 5 site notices displayed around the site on 17th January and a press advert published on 24th January 2024.</p>
Total number of responses	TBC
Number in support	TBC
Number of objections	TBC
A petition raising objection signed by 2314 people was received on 15 th February 2023.	
A petition expressing support including details of 72 people was received on 8 th February 2024.	

Section 106 Heads of Term	Amount	Agreed in Principle
Affordable Housing (37 Social Rented and 36 Shared Ownership)	n/a	YES
Early-stage affordable housing review mechanism	n/a	YES
Carbon offset	£176,047	YES
Healthy Streets	TBC	TBC
Legible London	£22,000	TBC
Considered construction (monitoring and compliance)	£25,000	YES
Contributions towards consultation on extending nearby CPZs and future implementation of CPZs	£25,000	YES
2 years free car club membership per dwelling	n/a	YES
Twenty free car club driving hours per dwelling in the first year	n/a	YES
Retention of original architects	n/a	TBC
Monitoring fees	£500 per head of term	TBC
Total	TBC	TBC

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development would deliver 230 dwellings on a highly accessible, under-utilised previously developed land located at the heart of an Area of Renewal and Regeneration. The proposal would make a substantial contribution to the housing supply in the Borough and would help to address the Council's acute housing delivery shortages.
- The proposal would substantially improve the retail environment of Penge as a District Centre and would address the current lack of activation between the Blenheim Centre and the High Street with enhanced commercial frontages.

- The provision of new public realm within the site and improvements to the surroundings, including landscaping and biodiversity net gain would create a more secure, sociable environment for residents and the wider community.
- Adequate sustainability measures would be incorporated achieving a reduction in combined domestic and non-domestic carbon emissions (CO₂) by a minimum 73% and meeting BREEAM Excellent for non-residential floorspace. Environmental matters such as air quality, contamination, noise, light pollution and drainage, would be subject to appropriate conditions in any approval.
- The proposed development would provide a sustainable car free scheme and sustainable transport options and, with a suit of mitigation measures secured to address the potential increase in car parking stress, is not considered to result in an unacceptable impact on the surrounding highway network.
- Although the removal of the current shopping centre building which detracts from the conservation area is supported, the proposed development would result in 'less than substantial harm' to a range of designated heritage assets under the NPPF definition.
- Officers have also highlighted a number of areas where the proposed development would transgress from planning policy requirements, including the visual impact of the proposal on the wider townscape and the immediate low-rise suburban context, as well as the impact on the amenities of occupiers of some of the adjacent residential sites.
- However, 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, the considerations advanced in support of the proposal can be seen as sufficient to clearly outweigh the adverse impacts, when assessed against the policies in the Framework taken as a whole. Accordingly, the application is recommended for permission, subject to planning conditions, the prior completion of a S106 legal agreement and any direction from the Mayor of London.

1. LOCATION

- 1.1 The application site, measuring approximately 1.02ha, is rectangular in shape and is located southwest of Penge High Street, behind numbers 126-154. The site accommodates a part three, part four storey shopping centre building with a multi storey car parking facilities. The shopping centre comprises retail units (use Class E) with a combined Gross Internal Area (GIA) of approximately 4,416sqm.

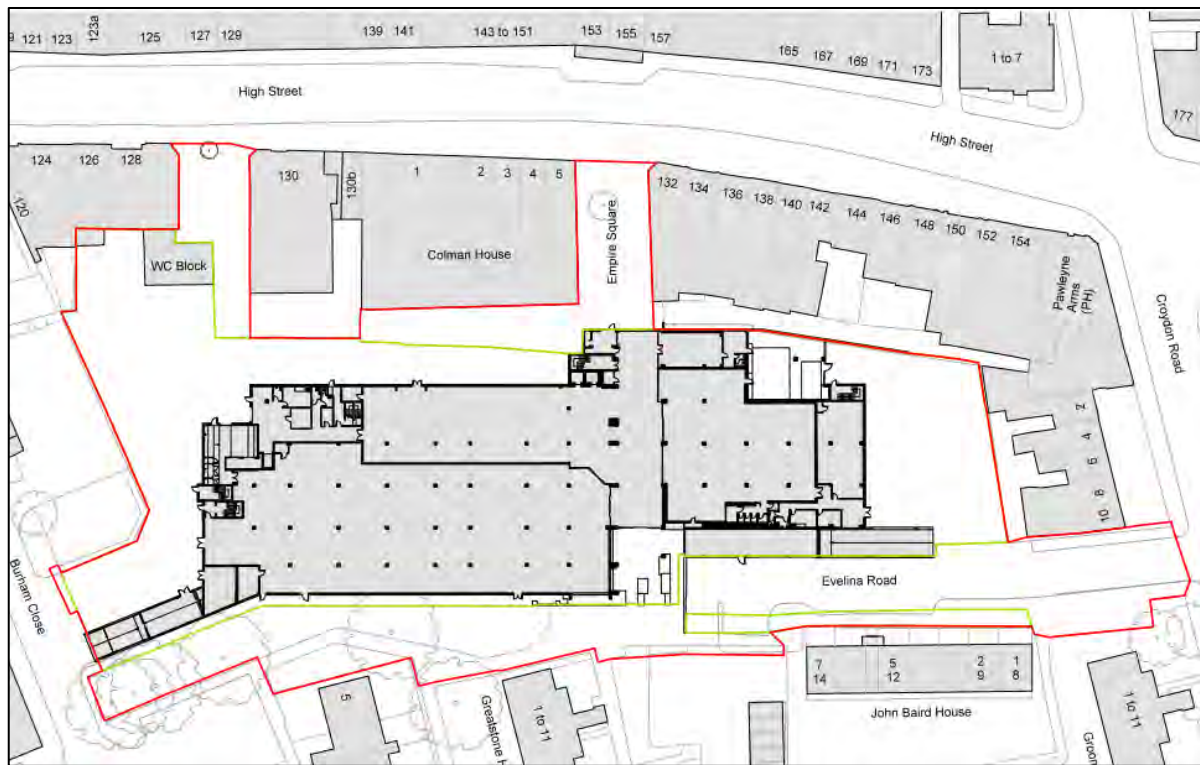


Fig. 1.1 Existing Site Plan.

- 1.2 There is a pedestrian access to the shopping centre from Empire Square via the High Street and from the Clarion Estate via Evelina Road to the rear/southwest. There is vehicle access to the multi storey car park from Evelina Road and Burham Close, as well as vehicle access to the parking and service yards.
- 1.3 To the north the site adjoins the Royal Mail Sorting Office car park. At the southern and northern peripheries of the site there are areas of hardstanding used for parking and servicing in connection with the shopping centre and other shops along the High Street. There are 88 existing car parking spaces on site as the upper 2 floors of the multi-storey car park are no longer in use due to a lack of demand for spaces.
- 1.4 The surrounding area is characterised by a mix of commercial and residential buildings that range between 3 and 4 storeys. To the southwest of the site is the Blenheim Estate, which is characterised by red brick apartment buildings ranging between 2 and 4 storeys. To the northeast of the site there are a collection of buildings fronting the high street, which are three storeys with commercial uses at ground floor and apartments above, although the uses are variable.



Fig.1.2 Aerial Image of the Existing Site.

- 1.5 The site falls within Primary Shopping Frontage of Penge District Centre; Crystal Palace, Penge, and Anerley Renewal Area, as well as London Plan Strategic Area of Regeneration (ref. 82 London Plan?).
- 1.6 The application site is located within a Tier IV Archaeological Priority Area. A very small part of the site (Arpley Square) is located within the Penge High Street Conservation Area. The wider area contains a scattering of small conservation areas including the Alexandra Cottages Conservation Area located some 260m to the east, Crystal Palace Park Conservation Area some 630m to the north, as well as the Barnmead Road Conservation Area and the Aldersmead Road Conservation Area, both located in Beckenham. There are also a number of statutory and locally listed buildings in the vicinity of the site, including the Church of St John the Evangelist and listed almshouse complexes of the Royal Naval Asylum to the north-west of St John's Church, and the Royal Watermen's and Lightermen's which face the High Street.
- 1.7 The site lies within a designated view London Panorama 4A.2 (Primrose Hill summit to the Palace of Westminster) and a View of Local Importance – from Crystal Palace Park towards Beckenham, Bromley, West Wickham.
- 1.8 The site is located within an area that has a minimal risk of flooding (Flood Zone 1), although the Environment Agency flood map for planning indicates the potential for surface water flooding.
- 1.9 The application site has a Public Transport Accessibility Level (PTAL) of 4/5, on a scale where 1 indicates poor access to public transport and 6 is excellent. The site is located within a walking distance from Kent House, Penge West and Penge East Railway Stations and High Street forms part of the Strategic Road Network. There are some Controlled Parking Zone (CPZ) areas surrounding the site. They are: Maple Road north of Heath Grove (Monday – Saturday 8.30am – 6.30pm), Southey Street (Monday – Friday 8.30am – 6.30pm), Raleigh Road (Monday – Friday – 10am – 12 Noon) and A234 High Street (Monday – Saturday – 8.30am – 6.30pm).

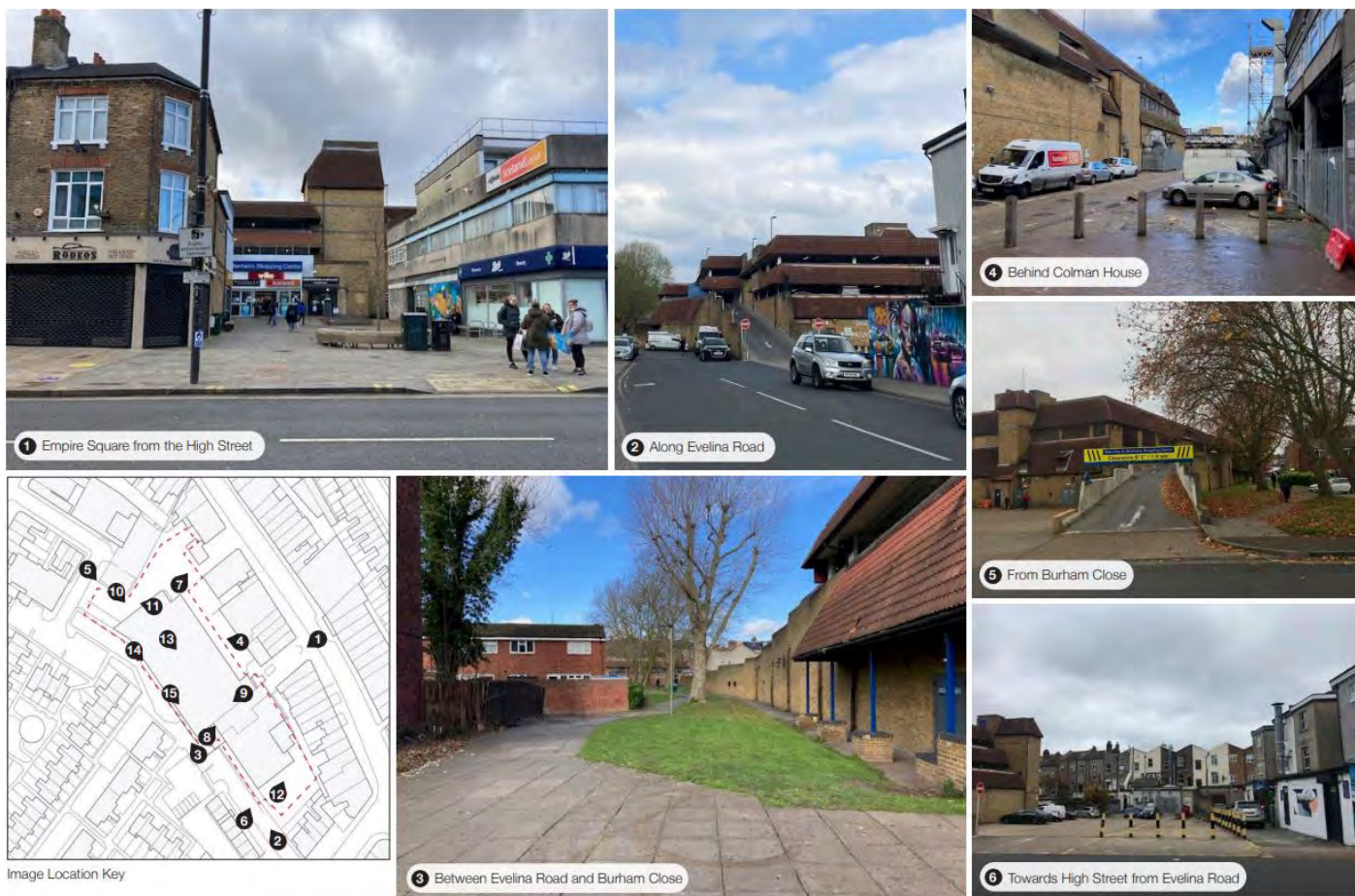


Fig.1.3 Application Site and its Context.

Land Ownership

1.10 In 2021 LB Bromley sold the freehold of a large proportion of the site to New River who was at the time a long leaseholder. A 35% affordable housing covenant was included within the purchase contract. New River has subsequently sold the freehold and leasehold to Hadley Penge LLP (The Applicant). A plan showing the planning boundary and ownership boundary has been included as part of the application. It is assumed that there are small areas of the site where the freehold is owned by LB Bromley and therefore these areas could be classed as public sector land. The submitted application form includes information relating to ownership of the site and only lists LB Bromley as another owner of land within the planning boundary.

2. PROPOSAL

2.1 The proposed development would comprise of demolition of existing buildings to facilitate a mixed-use development providing up to 230 dwellings, up to 2,714sqm of commercial/town centre floorspace and associated communal amenity space, play space, car parking, cycle parking, refuse storage and plant space in four buildings ranging between 3 and 16 storeys; alongside the provision of public realm and new pocket park with associated landscaping improvements.

2.2 The proposed blocks comprise the following:

- Block A would be 6 storeys with 136sqm of commercial space located on the ground floor (Sustainable Transport Hub) and 25 residential dwellings on upper storeys (2 to 5) accessed from Arpley Mews (extension of Arpley Square providing residential street with access for vehicle parking and servicing);

- Block B/C would be part 9 storeys (with 1 storey setback) and 16 storeys and would accommodate 759sqm of commercial floorspace, including commercial car park, on the ground and first floors and 152 residential dwellings on upper levels as well as maisonettes accessed independently at ground floor level. There would be a shared communal podium roof terrace located at 3rd storey to the south and accessed via both Block B and C stair cores. The main residential entrances would be off Arpley Mews and Blenheim Square (extension of Empire Square providing new full pedestrianised public realm and landscaping);
- Block D/E would be 8 storeys (Block D) and part 4/5-storeys (Block E) with 1,759sqm of commercial floorspace on the ground and first floor levels and 50 residential dwellings located above accessed from Evelina Road. There would be a shared communal podium roof terrace located at 3rd storey to the north and accessed via both Block D and E stair cores; and
- Block F would be formed from 3 x 3 storey residential townhouses located along Arpley Mews.

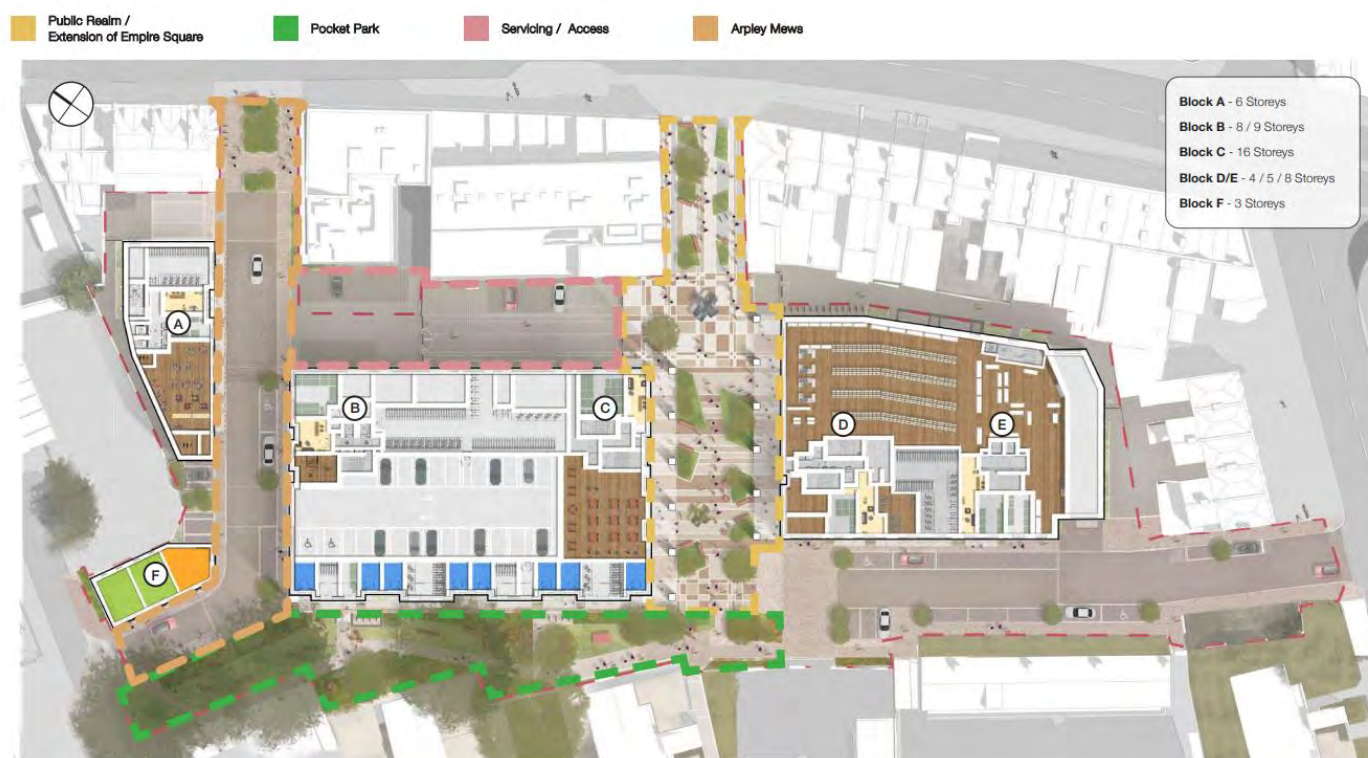


Fig. 2.1 Proposed elements of the revised scheme.

- 2.3 The proposal would also incorporate a Pocket Park – the existing green link between Evelina Road and Burham Close which is proposed to provide enhanced useable green space with play opportunities.
- 2.4 The existing space to the back of Colman House would remain as a dedicated space for servicing and/or vehicle circulation but would be improved with new surface treatment and greening along the proposed facade. The existing car parking and access to high street commercial units would be retained with the pedestrian route through the yard clearly demarcated through flush kerbs and in ground lighting. The road layout to existing Evelina Road would also be revised with improved hard landscape, street trees and planting.
- 2.5 Residential cycle parking would be provided for 414 residential long stay spaces within the buildings and 14 short stay spaces within the landscape strategy. 104 Commercial spaces would be provided, 22 of which would be located within a designated cycle store in Block D/E, and the other 82 spaces located within the public realm. Of the residential spaces required, 75% are provided as a double tier stacking system (Easylift Stand System or

similar), 20% are provided as Sheffield Stands and 5% are provided as Adapted/Accessible Spaces.

2.6 The scheme proposes 24 commercial parking spaces (inclusive of 2 accessible spaces and 2 car club spaces with accessible dimensions) and 8 residential accessible car parking spaces located along the Burham Close as well as on the Evelina Road access routes. 20% of spaces would have active charging facilities with the remaining 80% passive. 2 car club spaces would be provided on site within the podium car park to be used by both residential and commercial users.

Amendments

2.7 On 14th February 2023 the Greater London Authority (GLA) announced, with immediate effect, that all planning applications for residential buildings over 30 metres in height must include at least two staircases to be considered by the Mayor of London for approval. As such the proposal has been revised to accommodate a second staircase in Blocks C and D.

2.8 Following the February submission, on 24 July 2023, the Prime Minister and Secretary of State for Levelling Up, Housing and Communities issued a long-term plan for housing, which required the provision of two stairs in buildings over 18m in height (measured to the finished floor level of the uppermost habitable floor). The scheme has been further revised by the submission dated 19th December 2023 and publicly re-consulted in January 2024. In summary, the following amendments have been made:

- The height of buildings reduced as shown in Table 2.1 below;
- The overall number of residential units has reduced from 250 to 230;
- Several of the 2 bed 4 person apartments have been changed to 2 bed 3person apartments;
- The tenure of the town houses (Block F) has changed from Private Sale to Social Rent and Shared Ownership;
- The cores of Buildings B/C, D/E have been adjusted to meet fire regulations;
- The internal layout of the units has been reconfigured, there are minor changes to the ground floor (bike and bin numbers), with adjustment to some window locations, bin and bike stores at ground floor level;
- Elevational alterations include adjustments to window locations and additional street art installation along Evelina Road;
- Changes to the proposed material palette, with the tallest building (Block C) featuring a lighter, stock brick; and Blocks A, B, D and E retaining a red brick finish, but with a darker tone;
- For Blocks D and E, a new south-facing roof garden and well-being space has been provided on the third floor;
- A landscape strategy has been further developed;
- Provision of new informal workspace at ground and first floors of Block D/E with activation to the corner of Evelina Road and Blenheim Square;
- Updates to servicing strategy and Evelina Road to accommodate Iceland supermarket.

	Submitted		Proposed	
	Storeys	Maximum height	Storeys	Maximum height
Block A	6	24m	6	22.5m

Block B / C	9 / 18	65m	9 / 16	59.0m
Block D / E	4 / 6 / 9	34m	4 / 5 / 8	31.2m
Block F	3	12.1m	3	12.1m

Table 2.1 The overall height reductions across the scheme.



Fig. 2.2 Image of Arpley Mews looking from the High Street towards the Pocket Park (left) and the view of Blenheim Square looking from Empire Square (right) (Planning Addendum Report).



Fig. 2.3 View of Blenheim Square looking from Evelina Road (Planning Addendum Report).



Fig. 2.4 View of Pocket Park looking from the townhouses (Block F) towards Evelina Road (Planning Addendum Report).



Fig. 2.5 View of the proposal looking from the junction of Croydon Road with Evelina Road (Planning Addendum Report).

3. RELEVANT PLANNING HISTORY

3.1 The planning records for the application site include several applications that date back to the early 1980's, prior to construction of the shopping centre and multi-storey car park as it exists today.

- 3.2 In December 1988, the Council granted outline planning permission for demolition of the existing supermarket building and multi storey car park building to be replaced by a detached building comprising 8,500sqft retail store and 18,000sqft part one, part two storey supermarket with service yard areas and 115 car parking spaces (ref. DC/88/04781/OUT).
- 3.3 Various applications have been submitted following construction of the Blenheim Centre in the early 1990's, including alterations to shopfronts, the erection of plant and air conditioning enclosures and the installation of security shutters.
- 3.4 In June 2020, permission was granted for the change of use and two storey extension to create a part one/three storey building comprising retail unit at ground floor level and 2 x 1 bedroom flats on the first and second floors (Use Class C3) (ref. DC/19/04276/FULL1). This permission has not been implemented and is now lapsed.
- 3.5 In November 2020, planning permission was refused for the change of use and a two-storey extension of the public conveniences located in Arpley Square to create part two/part three storey building comprising retail unit at ground floor level and 1 x 1 bedroom and 1 x 2 bedroom flats on the first and second floors (ref. DC/20/03249/FULL1). The reasons for refusal were as follows:
- 1 The proposed extension, due to its height and proximity to the rear of the neighbouring flats at No. 126-128 High Street Penge, would result in an increased sense of enclosure and significant loss of light, outlook and prospect to these neighbouring residents; thereby contrary to the objectives of the National Planning Policy Framework (2019) and Policy 37 of the Bromley Local Plan (2019).
 - 2 The proposed development would provide an unsatisfactory standard of residential accommodation for the prospective occupants of the first floor two bedroom flat, taking into account the paucity of internal space and lack of private amenity space, thereby contrary to Policy 3.5 of the London Plan (2016), Policy 4 of the Bromley Local Plan (2019), the Mayors Housing SPG (2016) and The National Technical Housing Standards (2015).
- 3.6 In August 2022, permission was granted for the temporary stationing (up to 5 years) of an eight station Brompton bike locker within Empire Square, associated with a bike hire scheme (ref. DC/22/02246/FUL).

Environmental Impact Assessment

- 3.7 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the Regulations) identify certain development projects – Schedule 1 developments, for which an EIA is mandatory, and Schedule 2 developments, for which EIA may be required. The proposed development is not Schedule 1 development but is considered to be Schedule 2 development (under paragraph 10(b)), being an “urban development project”, including more than 150 dwellings. However, the site is not within a sensitive area as defined by the Regulations.
- 3.7 In August 2022 the applicant submitted a Screening Opinion Request under Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 (“EIA Regulations”), in respect of the application proposal. Taking account of the location and context of the site and the scale and likely significance of any environmental effects resulting from the proposed development it was determined that the proposals did not constitute EIA development. The Council issued a screening opinion to that effect on 12th October 2022 (22/03428/EIA).

Design Review Panel

DRP 1 (1st of April 2022)

- 3.8 The review proposal comprised mixed-use development of the site delivering 286 homes (35% by affordable housing) circa 3,000sqm of town centre uses and new and enhanced areas of public realm with associated landscaping, parking and amenity spaces. The proposal consisted of four main building elements ranging from 3 to 21 storeys. The key points:
- The Panel supported the principles of the site layout, however it recommended a reduction in the quantum of development to achieve a scale and massing appropriate to Penge's centre. The Panel did not support the proposal for 3 linked tall buildings of up to 20 storeys, in a context which is currently two to four storeys.
 - The Panel questioned whether it would be possible to achieve sufficient amenity and play space, without a reduction in the number of flats.
 - The Panel supported the proposed central space but thought this would have the character of a route, rather than a square, because of its proportions.
 - Podium gardens could be valuable for residents, but the panel suggested these would benefit from better sun and views facing south-west.
 - Wind and sun path analysis was considered to be essential to test the quality of spaces, and their suitability for proposed uses, such as a market.
 - The proportion of single aspect homes should be minimised.
 - The Panel also asked for more exploration of the scheme's relationship with the Royal Mail site, both in terms of residential quality for Block A, and this neighbouring site's future development potential.
 - The Panel encouraged further thought about how the architecture can respond more specifically to the character of Penge.
 - The drawings suggested a 'New London Vernacular' type of architecture that didn't yet seem to be at all rooted in its location, and which the panel thought needed further development to avoid being generic.
 - The approach to environmental sustainability and low carbon design appeared convincing, and The Panel encouraged the applicant to go beyond policy compliance as the scheme evolves.

DRP2 (5th of September 2023)

- 3.9 The proposed development comprised 250 dwellings, 2,775sqm of town centre floorspace, new areas of public realm and associated works. The Panel was pleased to see that microclimate and overshading studies had been conducted, along with calculations for play space provision. The introduction of townhouses fronting onto the pocket park was considered as a positive move, as was the simpler, calmer architecture and materiality. The reduction in height and the redistribution of massing, to respond better to the site's context, was also welcome. The panel felt that the tallest element might be acceptable (although it was still pushing the limit of what can be accommodated within the townscape) but it would like to see more long views to understand its visual impact, especially from Crystal Palace. The Panel urged the design team to be realistic about the form of the tower, which could no longer be accurately described as slender. The key points:
- The treatment of the service yard, separated from the public realm, was more successful, although some issues remain, including the management of delivery mopeds using the space. The need for residents to use the service yard to access the bin and bike stores for block BC was considered particularly unfortunate and, more generally, the experience of arriving at and moving around the development should feel safe at all times of day and night.
 - The ambitious landscape design was welcome, particularly for the central square, but the panel noted that the management and maintenance of these spaces would be critical to their success.

- The Panel was also supportive of the ambitions to integrate artwork into the scheme, although it needed to be resolved in detail how this was to be achieved and managed over the long term.
- The Panel noted that it had not had the opportunity to review the internal arrangement of the floor plans, so could not comment on the residential quality likely to be achieved. However, it did support the improvement to the quality of the amenity provided by the relocation of the podium garden of block BC, which allowed for a more positive aspect and greater access to sunlight. The podium garden of block DE in contrast remained less satisfactory, however, and the panel urged the design team to explore options for improving this.
- The Panel requested additional information to aid future assessment of the proposed development and suggested further revisions and amendments to the scheme, as summarised below:
 - Consideration should be given to the management of delivery mopeds using the service yard to the rear of Colman House;
 - Consideration needed to be given to the need for residents to use the service yard to access the bin and bike stores from Block BC;
 - The podium garden of Block D/E would be of a lesser quality when compared to BC due to its orientation and options should be explored to improve this so the affordable and private homes have equally good levels of amenity;
 - Consideration of increased planting on Evelina Road to provide more of a visual link between Block DE and the pocket park;
 - Although the reduction in overall height was welcome, the heights were still challenging within the context of Penge, and much of the reduction had been achieved at the expense of the slenderness and elegance of the tower (Block C);
 - Block A would benefit from being reduced by another storey;
 - Revisions to materiality were broadly supported, but the introduction of subtle differentiation in texture and tone could help reduce the risk that the consistent materiality becomes monolithic.

4. CONSULTATION SUMMARY

a) Statutory

4.1 Greater London Authority (GLA) – Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below: (a copy of the GLAs full report is attached at Appendix 3).

- **Land use principles:** The proposed mixed-use development of the site is accepted in principle, in line with Policies SD6, SD7, SD10 and H1 of the London Plan.
- **Housing:** The proposed development includes 35% affordable housing by habitable room including 59% social rent and 41% London Shared Ownership and therefore could be eligible to follow the Fast Track Route. An early-stage review and affordability levels should be secured.
- **Urban design and heritage:** Concern is raised with the proposed height and its response to the local context. Refinements to the height, scale, layout, architecture and materials, and public realm should be considered. GLA officers consider harm to be caused to the nearby conservation area which will need to be addressed prior to Stage 2.
- **Transport:** Further information is required on the proposed relocation of the Moped Bay and the bus stop, potential improvements to cycle parking facilities, and justification for the retention of commercial car parking. Contributions should be sought towards Legible London signage, bus stop and Healthy Streets improvements. The residential element will be car-free which is supported.

- **Sustainable development and environment:** Further information is required on energy, circular economy, whole-life cycle carbon, green infrastructure, air quality, sustainable drainage, and water efficiency.

4.2 Transport for London – Additional information required.

Site Description and Context

The site fronts Burham Close to the north and Evelina Road to the south-west, beyond which there is housing. Both are borough highway The A234 High Street is located to the east and is the main part of Penge town centre supporting multiple shops and other businesses. The A234 forms part of the Strategic Road Network (SRN) for which the Council is highway authority, but TfL is the joint traffic authority and has a shared network management duty under the Traffic Management Act 2004 to ensure expeditious movement of traffic on the SRN. The nearest section of the Transport for London Road Network (TLRN) is the A205 London Road which is approximately 3.25km away from the site and would not be impacted by the development.

Vehicular access is proposed from Evelina Road as now and an extension of Burham Close known as Arpley Mews. Pedestrian and cycle access would be via these roads and additional active travel links into the site from High Street via Arpley Square, Empire Square and the new proposed Blenheim Square. Evelina Road is off Croydon Road, also part of the SRN whilst Burham Close is accessed via predominantly residential streets from the High Street. Croydon Road and High Street support multiple bus stops which are served by routes 75, 176, 197, 227, 354, 356, 358 and N3 which link with Beckenham, Crystal Palace and other areas in the borough and also with inner and central London and with major destinations such as Croydon in outer London. Penge West, Kent House and Penge East National Rail stations and Beckenham Road tram stop are also within walking distance, but all are only just within reasonable distance for a station (960m). Consequently, the site currently records a public transport accessibility level (PTAL) of 4 to 5; on a scale of 0 to 6b. For the purposes of application of London Plan policy, the highest PTAL is taken. Furthermore, improvements in the permeability of the site consequent upon the development proposals would shorten the distance to public transport and thus raise the PTAL to a consistent level. For those requiring step free access to public transport whilst all buses are step free, only Beckenham Road tram stop has such provision. Penge West and East stations have limited provision and Kent House none. Cycleway 18/ National Cycleway Network 21 Waterlink Way, part of the Strategic Cycle Network (SCN), is about 600 m from the site accessible from Kent House Station. Development works on Cycleway 18 are ongoing though the route linking to the National Cycleway is currently used. The proposed development consists of the demolition of all existing buildings and the construction of four blocks ranging in height with retail and other commercial uses on the main ground floor frontages and residential elsewhere and above. There is associated car and cycle parking, access, and landscaping. 250 dwellings are proposed, and it would appear from the latest case documents that the commercial floorspace will be 3,397m² GEA compared with 2,828 m² assessed in the Stage 1 report. The application site takes in public highway and other land not within the control of the applicant and proposals are put forward for these areas.

Healthy Streets

All developments proposed should support the Mayor's Healthy Streets approach in line with Policy T2 of the London Plan, with respect to the 10 Healthy Streets indicators. The proposed redevelopment will see an increase in the number of pedestrian and cycle trips to/ from the site and in the local area and a reduction in the number of vehicle trips. The Active Travel Zone assessment (ATZ) has identified several potential improvements on and around the

site, notably the existing pedestrian facilities at the site, which link eastwards with the High Street and into the residential area to the west, and the north-south connection between Evelina Road and Burham Close, which lead on to St Johns Primary School and Robin Hood Surgery. Within the site, enhanced public space is to be proposed at Empire Square and Arpley Square, with trees and other planting, cycle parking and better natural surveillance encouraging active travel, albeit as these are outside the applicant's control, they will need to be delivered by s278 agreements and other mechanisms if they are to become a reality. These improvements are, though, crucial to creating a permeable, safe, and attractive development where pedestrians and cyclists have priority. Therefore, certainty of delivery will be required. Furthermore, the current design keeps existing parking for High Street and Colman House retail, related and offices uses, on or accessed via Arpley Mews, and is proposing additional loading bays/ accessible parking on Evelina Road and a new vehicle access off Evelina Road. This will result in these roads being vehicle dominant, which is contrary to the Healthy Streets Approach. As it is likely that primary residential access will be along Burham Close via Arpley Mews and Evelina Road, due to the location of cycle stores and block entrances, it is important that these provide a Healthy Streets environment. Appropriate footway widths, landscaping, and natural surveillance should be included and then implemented along these routes. As currently proposed, these access routes are dominated by vehicle parking and loading areas and do not provide a visually attractive, comfortable, and safe public realm that encourages safe walking and cycling, contrary to London Plan policy, Vision Zero and Healthy Streets objectives. The proposed Arpley Mews is primarily a vehicular route for the podium car park and parking at the rear of units along A234 High Street. Further justification is required as to the necessity of these car parking spaces, and of the loading bay and parking bay to the north of building A. These will impact directly on the key north south and east west active travel routes, and public realm improvements to the frontages of the development would effectively be neutralised through vehicle dominance. This is also the case for Evelina Road, where a new access road for units along A234 High Street is proposed where there is not currently, and no adequate justification for the necessity of this is provided. Where it is shown to be necessary for there to be vehicle access, suitable shared surface management measures and mitigation proposals should be provided and secured in any permission. Further review of the proposals for this part of the site is required to make it pedestrian and cyclist friendly in accordance with London Plan T2 Policy. Furthermore, as mentioned above, there are concerns that some of the proposed landscaping and permeability works to Empire Square and Arpley Square, which connect to A234 High Street, are outside of the site's red line boundary, and even if part of the application site they are not within the applicant's control. Therefore, it may not be feasible to deliver these improvements. We would therefore strongly suggest that Grampian conditions and obligations are imposed in any permission to ensure that these crucial elements of the development and its mitigation are actually delivered. This is particularly important for the north-south link via between Evelina Road and Burham Close. As also mentioned above, Evelina Road is largely car dominant, which will be exacerbated by the application proposals, and if the retained vehicle parking and loading and access can be justified, this must be backed up by robust management and mitigation measures. That said, the improvements to Empire Square extending to the new Blenheim square will provide a new pedestrian forecourt, increasing permeability with good natural surveillance provided it can be delivered and managed and maintained accordingly. Any improvements should be secured through the scheme design and section 106 agreement, including 24/7 public access, rights over land in other parties' ownership and control, and the s278 agreement in respect of the public highway. Funding towards and/or inclusion in the s278 agreement of other Healthy Streets improvements to the routes to/from public transport and other services and facilities in Penge should also be secured. This is to address deficiencies identified through the ATZ assessment and through other assessments and supporting the car-free residential development and low car parking provision of the other elements. This requirement is in line with Policy T2 part D (1). Suggested areas for improvements include the footway on the walk to Penge East station and pedestrian crossings between the site

and the opposite sides of the High Street and Croydon Road. Particular consideration should be given to the needs of those requiring step-free access given the limited amount of disabled persons' car parking which is proposed. Works should also consider measures to prevent mopeds serving takeaways on the High Street from accessing the site's new public realm. This development would benefit from new Legible London signs on the High Street and within the site. It is therefore requested that a contribution of £22,000 towards new signs and nearby existing Legible London signage map refreshes, is secured through the s106 agreement. This request is in line with Policy T3, by supporting "walk and cycle wayfinding improvements" in Table 10.1 and Policy T2 "Healthy Streets".

Trip Generation

The submitted trip generation predicts 1,909 two-way daily trips as a result of the proposed mixed-use residential and commercial development, with 826 two-way daily trips by train and 387 two-way daily trips by bus. The proposed commercial floorspace unit is now understood to be 3,397sqm GEA though previous mentions of floorspace were a 2,828sqm development. The impact on trip generation should be clarified. By virtue of the size of the shopping centre being reduced and because the development would be close to being car free, vehicle trips will be less than currently. However, public transport use and active travel will increase. Further work on the trip generation assessment is needed to establish the extent of the increase and the need for mitigation, particularly as the quantum and type of the proposed commercial floorspace is unclear. Furthermore, the updated transport assessment lists only office space as the TRCS data used in the assessment for the proposed commercial floorspace. As this commercial floorspace is currently proposed for any use in class E, a further review of the TRICS data is required to determine how accurate the assessment is, and a worst-case scenario should be assumed. The assessment for the existing shopping centre uses TRICS data from outside of London and food stores which whilst in London are in central London, or for larger stores, or those focussing on a different customer base than the existing Iceland store. In particular, Table 6-6, 6-7, 6-10, 6-11, 6-14, 6-15, 6-16, 6-17 includes an Underground category yet there are no nearby Underground stations, the nearest being Brixton many kilometres away. The Transport Assessment should therefore be revised accordingly to include only the stations within PTAL calculation distance, which have London Overground/National Rail services and trams. Information relating to which National Rail stations are considered for trip distribution should also be provided. The trip distribution per station should be presented, and thus the impact on services should also be considered (National Rail and London Overground Stations). TfL will undertake a similar assessment of the impact on bus services once there is an agreed bus trip generation figure. Once these have been provided, a view as to whether further mitigation on the existing public transport network can be provided, along with any need for bus mitigation on High Street and/or Croydon Road. Cycling Residential long stay cycle parking would seem to meet the minimum quantity standards in London Plan Policy T5 and would comprise 5% Sheffield Stands at wider spacing, 20% as Sheffield stands at normal spacing with the remainder being as double stackers. However, some amendments to the design, location, and space available for cycle parking are needed to meet other quality standards set in the London Cycling Design Standards (LCDS) as referred to in policy T5. These could reduce the overall quantity and/or proportion of Sheffield Stands if left to a later stage, and thus should be addressed now. Particular, but not the only, focus should be on ensuring appropriate provision for disabled people, aisle widths for areas with double stacked cycle parking and providing safe and convenient access to the stores. Access to all ground floor cycle stores is from the public realm, including less overlooked areas, which raises concerns over the personal security of users who could easily be followed into these stores or, given that there is only one door, pushed back in when they try to exit. The LCDS recommends that access to residential cyclists' facilities should utilise the communal entrances to the flats to improve safety. These provide a space, with a high probability of passing foot traffic, for a cyclist to wait before entering the cycle store, affording cyclists the same level of personal security as

residents without cycles, or allows them to escape from the store if tailgated in. If this is proved not to be possible, at least two access points to each cycle store should be created to provide a cyclist with an escape route and a choice of access points into the store. This is relevant to crime and disorder as well as planning considerations. Issues also arise where it appears on plans that cycle store doors along with bin store doors open outward onto the public realm reducing the footway space and causing a hazard to pedestrians and cyclists alike. Other than emergency access all doors should open inwards on public routes. This should be rectified prior to determination. Long stay cycle parking for the commercial uses has similar issues but also should be increased as necessary to at least meet minimum London Plan quantity standards applicable to the increased commercial floorspace now proposed. Facilities such as lockers and showers for staff who cycle should be provided and secured in any permission in line with Policy T5 of the London Plan. Short-stay cycle parking for commercial and residential uses are to be located around the site's public realm in the form of Sheffield stands. In total, 114 shortstay spaces are to be provided, comprising 16 short-stay residential spaces, 86 short-stay commercial spaces. An additional 12 spaces are to be provided as part of public realm improvements to Arpley Square/ Empire Square off High Street Penge. This provision would meet London Plan quantum standards, but this needs to be confirmed given the increase in commercial floorspace now proposed. Furthermore, some provision appears to be outside the site ownership boundary, such as the clusters around Empire Square and Arpley Square. Means of delivery of these stands should be clarified and secured in any permission. All short-term cycle parking should also be demonstrated to meet the LCDS, as set out in policy T5.

Car Parking

The residential element will be car-free, except for eight disabled blue badge (BB) bays located around the site, equating to 3% of the residential dwellings, which is broadly in line with the outset provision required by London Plan Policy T6. The London Plan does require identification of space to provide BB parking for the equivalent of a further 7% of dwellings in the future, should demand arise. However, given the town centre location, the need to prioritise active travel and other Healthy Streets objectives, the wide range of accessible bus services and some step free access at Penge East and Penge West stations, the requirement can be waived here, subject to complementary accessibility improvements. This should include routes to/from bus stops and the waiting environment at these, routes to/from rail stations, and exemplary provision for disabled people's cycle parking and pedestrian routes suitable for all within the development itself. As there are only eight BB spaces it is encouraged that all have electric vehicle charging provision (EVCP) from the outset instead of the 20% proposed as such with the remainder having passive provision. Page 8 of 11 Four of the BB parking spaces will be accessed via Arpley Mews, with two located outside the entrance to block B and two located between building A and building F. The other four BB parking spaces will be provided on Evelina Road, two outside Blocks D and E on the east side of the road and two on the west side adjacent to the existing residential properties on Evelina Road. Some discrepancies in the BB parking on Evelina Road exist, as it is unclear if the BB parking on the west side of Evelina Road is within the site's ownership boundary and instead appears to be Bromley highway. If this is the case, then a change in traffic regulation order and signage would need to be funded in the s106 agreement. This should be clarified and a view as to whether it is attainable, especially given that existing residents' parking would be lost, should be taken, with a possible need for re-provision. Furthermore, the parking for disabled people living in or visiting block C would be on Evelina Road or Arpley Mews located nearly 80 metres away. An alternative location for BB parking close to the entrance to this block should therefore be identified. New residents, unless a disabled person, should not be eligible for on-street residential parking permits, and this should be secured in the section 106 agreement. The existing 216 space Blenheim Shopping Centre car park is proposed to be demolished; however, 24 non-residential car parking spaces are proposed to be retained within a podium car park. Seven of these spaces would be to replace

informal parking on Evelina Road. This parking is not in officially marked out spaces and instead would appear to arise due to a lack of control or enforcement. We can find no evidence presented justifying this provision, which is contrary to London Plan policy for this site. The other 17 non-residential car parking spaces have been justified as replacements for existing parking in the multi storey car park that is rented out on a contract basis. It is not clear who these spaces are used by, given that the adjacent existing and to-be-retained properties like Colman House seem to have and will retain their own parking. Details of the justification for the re-provision of these spaces is therefore needed for TfL to be able to consider whether this aspect of the development aligns with London Plan policy. Should the council accept any, or all, of this non-residential car parking provision within the podium, a car parking management plan should be required, with monitoring regime and targets for reducing use and for repurposing of the space as soon as possible, given that it is not London Plan Policy compliant. The proposed two BB parking bays within the podium car park would be acceptable. However, to improve access for all and by higher vehicles and to aid management and enforcement, these would be better located on-street or elsewhere, not in an expensive structure but preferably secured on-street outside of the site's public realm. The Council may wish to consider implementing a controlled parking zone and extending the hours of the existing controls for streets adjacent to or near the development for which new residents would not be allowed permits. In the absence of these measures, there is potential for residents of this development to park on existing streets, so it will not be car free and thus contrary to London Plan policy. A similar point applies in respect of town centre parking, albeit it is understood that this currently is the case with drivers preferring on-street parking to that in the multi storey car park. On street parking controls would provide priority for existing car-owning residents and can be funded by the development via the s106 agreement. The swept-path analysis for Evelina Road shows vehicles turning in the private car park of the Clarion Housing Estate to the west of the development. Alternative provision should be made given Clarion would be within their rights to control access and use of their property. In this event turning would be difficult especially if a larger vehicle and potentially unsafe on what is proposed as the key north south pedestrian and cycle route. Furthermore, private parking at the rear of properties on High Street is proposed to be retained. Seven parking spaces would be at the rear of and for the McDonalds and a further six at the back of, and for occupiers of Colman House. Some of these spaces are within the red line application boundary the rest accessed via the site. This will result in the proposed public realm improvements being nullified by car parking and associated vehicle movements. If these spaces and their accesses are required for a property or other pre-existing contractual reason, then evidence and explanation for this should be provided, and the design and layout of the development amended to minimise and manage the car parking and associated movement of vehicles. One possibility in this case could be for the spaces to be relocated to the proposed podium car park. If there is no property right or contract then we would suggest they are removed, in line with London Plan Policy. It is understood that mopeds currently use Arpley Square as a turning and waiting area when taking deliveries from McDonalds and other takeaways on the High Street. Two proposals have been put forward to provide a marked moped parking area for delivery riders to reduce the risk of them using the new and improved public realm, and to manage the demand for such parking. As Evelina Road is on the opposite side of the development to McDonalds and the other takeaways, it is unlikely it will be used by mopeds, so a High Street option would seem better. However, the specific location proposed would impact bus operations and the general movement of traffic given the bus stop opposite. We would suggest instead an existing parking bay adjacent to Arpley Mews, or just to the north, is converted for moped parking. This would still place the moped parking close to McDonalds and indeed nearer to other takeaways on the High Street, whilst having less impact on bus operations and the movement of general traffic. Further discussion and agreement is therefore required, including with TfL, given the potential impact on bus services and the SRN prior to determination on this proposal.

It is understood that the existing rear servicing for the properties on High Street will be retained. Thus Burham Close and Arpley Mews will provide access for servicing McDonalds, Colman House and other units adjacent to the north end of the site, as well as delivery and servicing access for the new development in blocks A, B, C and F. Evelina Road will provide service access for the new blocks D and E and a new two-way vehicle route for those properties adjacent to the southern end of the site. It appears that some of the loading bays on Burham Close/ Arpley Mews do not have room for vehicles to enter and egress in forward gear on site. In particular, the 8-metre loading bay marked for Pizza Hut requires vans to drive in and reverse out. This is not supported and having loading vehicles reversing out of site in a busy public realm poses what would seem to us to be an unacceptable safety risk, especially when alternatives would seem to exist, for example provision of loading bay/s on the High Street. Whilst in principle off-street servicing away from the SRN is supported by policy, the current proposals would appear to require revision and it is not clear why the marked on-street bays on High Street are not suitable for this purpose in this instance instead of car parking. Rapid EV charging should be provided for at least one of the proposed service bays. All vehicles should be able to enter and egress from site in forward gear and swept-path analysis should be provided to show this alongside proposals to manage pedestrian/cycle conflict with service and other vehicles on the access roads given the plans to improve active travel links along these. A full Delivery and Servicing Plan (DSP) is required by Policy T7. This should be secured through condition and developed in line with TfL guidance. The DSP should contain targets to minimise large service vehicle movements and encourage smaller and sustainable means especially at peak times and when the area is busy with shoppers and those walking and cycling. Consolidation/sharing of deliveries should be included.

Construction Logistics and Management

A full Construction Logistics Plan (CLP) should also be secured through condition and given the town centre location, should pay particular attention to managing and mitigating impacts on pedestrians, cyclists and buses on the High Street and Croydon Road and support Vision Zero. This should show vehicle access via Evelina Road and Burham Close, not via A234 High Street. Swept-path analysis, estimated vehicle numbers and mitigation should all be provided in line with TfL's current guidance. To minimise impacts on traffic flow, pedestrian amenity and bus operations, no construction vehicles/equipment, skips, or construction materials should be parked/stored on the SRN at any time. All construction vehicles exiting the site must undergo wheel-washing prior to entering the public highway and do so in forward gear. Demolition and construction workers should travel by active or sustainable means and not the private car. All haulage operators associated with construction should meet a minimum Freight Operation Recognition Scheme (FORS) rating of silver. All HGVs must comply with the Direct Vision Standard and HGV Safety Permit scheme. This should be secured by condition and s106 as appropriate.

Travel Plan

A full travel plan for both elements of the scheme should be secured. This should contain proposal for a monitoring regime and targets for higher mode shares for active and sustainable travel in line with London Plan policy T1 and the Mayor's Transport Strategy (MTS). These targets should be supported by clearly identified measures.

4.3 Historic England – Objection

- 21 February 2023

Summary

Historic England objects to these proposals because of the harmful impact the 18-storey building would have on the predominantly suburban character of the historic environment in this part of the borough. We would urge your Council to refuse this application and seek more modest forms of development for this site.

Significance of the historic environment

Penge is a suburban area of South East London characterised by largely Victorian residential buildings and tree-lined streets. The development of the area was spurred on by the arrival of the railways, with rapid expansion following the relocation of the Crystal Palace to the area in 1854.

The development site contains a 1980s shopping centre and car park which does not relate well to the surrounding townscape in our opinion due to its very large footprint and low-quality architecture. However, the site is located to the south of Penge High Street which contains a number of architecturally interesting retail, commercial, and residential buildings.

A portion of the high street (to the north west of the development site) forms the Penge High Street Conservation Area. The conservation area captures the low-rise suburban character of the Penge area, and incorporates a number of Grade II listed buildings within its boundary. These include the Church of St John the Evangelist which dates from 1847 and is of particular architectural interest for its striking stone broach spire which is also an important historic landmark in the conservation area.

The conservation area also includes two listed almshouse complexes dating from the very late Georgian period. These are the Royal Naval Asylum to the north-west of St John's Church, and the Royal Watermen's and Lightermen's Almshouses which faces the High Street. The latter is a surprisingly extensive complex for its suburban location, containing 46 houses. As a result, it has a large forecourt area which provides the listed complex with an attractive green setting, and sense of enclosure from the bustle of the High Street.

The wider area contains a scattering of small conservation areas which represent various different types of suburban housing. These include:

The Alexandra Cottages Conservation Area, located to the north of the development site. The conservation area is a rare suburban example of 'improved' housing established by various philanthropic housing associations (in this instance the Metropolitan Association) in Victorian London to provide affordable accommodation for the working classes. The conservation area is defined by its orderly plan comprising semi-detached, pitched roof houses arranged in several rows on a north-south axis.

The Barnmead Road Conservation Area, which comprises detached and semi-detached Victorian villas built around Kent House Station in nearby Beckenham for the emerging middle classes to the area. The Conservation Area Supplementary Planning Guidance (updated 2001) states that the character and appearance of the conservation area is derived from its "cohesive character, and from the "limited range plan forms and materials used in the development" (Para 3.1). It goes on to say that "the area's layout and spatial characteristics are a very important part of its character" (Para 4.25).

The Aldersmead Road Conservation Area, also in Beckenham, which contains Victorian and Edwardian detached and semi-detached houses built for the emerging middle classes. The conservation area includes Cator Park to the east from which these large suburban houses can be appreciated.

In all three of these conservation areas, there are many views from which the suburban character,

and cohesive forms of development can be appreciated with very little visual distraction. This is partly due to the consistent low-rise scale of development in this part of the borough. With the exception of Essex House - a post-war tower block in neighbouring Anerley, there is no tall building development in a considerable distance from the development site.

The proposals and their impact

These proposals involve the demolition of the existing shopping centre and the erection of a residential and commercial development comprising of 4 building between 3 and 18 storeys in height.

Due to the scale of the development, particularly the 18-storey building, the proposals would be visible across a wide area. The visual impact of the scheme on the historic environment is set out in the submitted *Heritage, Townscape and Visual Impact Assessment* (The Townscape Consultancy, December 2022).

The assessment demonstrates that the tall building would be highly visible in many views from the Penge High Street Conservation Area. It would rise considerably above the currently unbroken historic roofline in views along the high street (View 2). We consider that this impact would create a visual distraction in views of the characterful and low-rise historic high street, causing some harm to the conservation area.

The tall building would also be visible from Watermen's Square (View 3a and 3b). Whilst partially screened by the tree canopy when in leaf, the proposed winter view demonstrates that the tower would loom above the striking roofline of the Royal Watermen's and Lightermen's Almshouses, diminishing the ability to appreciate their architecture. The proposed tall building would also diminish the sense of enclosure and intimacy provided by the forecourt area. We therefore consider that these impacts would cause harm to the significance of the Grade II listed almshouse complex through development within its setting, as well as the conservation area.

We note that the document contains very little assessment of the proposals' impact on the Grade II listed St John's Church, despite it being an important listed building and local historic landmark in the immediate vicinity of the development site. Therefore, we have tested views of the proposed scheme from St John's Road using 3D computer modelling software to understand the potential extent of visibility in views towards the church. Our assessment suggests that the proposed tall building would appear above the north transept and nave roof when viewed from the far-side pavement along St John's Road.

Whilst the tree canopy would likely limit visibility when in leaf, the appreciation of the church's Victorian architecture and the prominence of its broach spire could be diminished, particularly during winter months. The tall building could also visually compete with the landmark qualities of the broach spire. Whilst a verified visual assessment would provide clarity on this matter, we consider it likely that some harm would be cause to the significance of the church as a Grade II listed building, and an important landmark in the conservation area.

The scheme would also be visible in views from the Alexandra Cottages Conservation Area (View 4). In the assessed view, the proposed tall building would terminate the south-facing vista along Albert Road where the planned layout and cohesive architecture of the conservation area can be well appreciated without visual distraction. The conspicuous presence of the tall building in this important view would undermine these important aspects of the conservation area's character, causing harm to its significance.

Similarly, the proposed tall building would terminate the west-facing vista along Barnmead Road (View 7). The current view allows the viewer to appreciate the cohesive architectural character of these large suburban houses and their leafy suburban surroundings. By terminating this vista and

rising significantly above the tree canopy, the eye would be drawn towards the tall building and away from characteristics that define this small but well-preserved conservation area. We therefore consider that some harm to the significance of the Barnmead Road Conservation Area would result from these proposals.

Finally, our own assessment using 3D modelling reveals that the proposed tall building would rise considerably above the distinctive and cohesive hipped roofline of the semi-detached houses lining Aldersmead Road. Whilst some distance away, the proposed tall building would create a visual distraction in picturesque views of these large Victorian and Edwardian houses from the park. Whilst visual testing would be helpful, it is likely that some harm would be caused to the significance of the Aldersmead Road Conservation Area as a result of these impacts.

Relevant Legislation, Policy and Guidance

In considering these proposals, we would draw your Council's attention to Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) which impose a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings. Section 72 of the Act requires local authorities to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government policy on how to carry out these duties is found in the National Planning Policy Framework (NPPF, July 2021). Section 16 of the Framework sets out how the historic environment should be conserved and enhanced, and makes clear at Paragraph 199 that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification (Paragraph 200). If the harm is deemed to be less than substantial, Paragraph 202 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

Historic England's recently revised Tall Buildings advice note supports an evidence-based and planned approach for the development of tall buildings. It encourages development plans to include "specific tall building policies to support area/sites identified as appropriate tall buildings" (p11). This is echoed in the London Plan, which has a specific policy relating to tall building development (D9)/ The Policy requires Boroughs to identify appropriate locations and heights for tall buildings and provides that "Tall buildings should only be developed in locations that are identified as suitable in Development Plans".

Bromley Council's Local Plan (2019) does not specifically identify the development site as potentially suitable for a tall building. The Local Plan does, however, contain a policy for the development of Tall & Large Buildings (Policy 47). The policy 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* [my emphasis]" (p127). The policy goes on to state that "Much of the Borough is not considered appropriate for tall buildings due to the *established suburban character of the Borough* [my emphasis]" (p128). It considers that some town centre locations may be potentially considered "where *no harm would be caused to heritage assets, the wider historic environment or important views* [my emphasis]" (p128).

Historic England's Position

The low-rise and leafy suburban townscape is a defining characteristic of this part of South East London, providing an important insight into the rapid expansion of housing for a range of social classes in 19th century London. Although the wider city has changed dramatically since this period, the suburban Victorian character remains largely intact and clearly legible around the development site, and this is reflected in the scattering of conservation areas and listed buildings in this area.

Your Council clearly understands the specialness of this suburban townscape in the designation of these conservation areas and the absence of policies supporting tall building development in this area. It is unfortunate that the applicant did not draw Historic England into pre-application discussions regarding these plans given the various heritage constraints.

Despite its conclusion, we consider that the submitted *Heritage, Townscape and Visual Impact Assessment* reveals that harm to a range of designated heritage assets would result from these proposals principally due to the incongruous scale of proposed 18-storey tall building within the low-rise suburban surroundings. The harm to the Alexandra Cottages Conservation Area would be particularly regrettable due to the rarity of this type of planned 'improved' housing within a suburban London context. However, this harm also relates to nationally significant sites, the most affected being the Grade II listed Royal Watermen's and Lightermen's Almshouses.

Whilst we have no issue with the principle of redevelopment in this location, and we welcome the potential improvements to the public realm, we do not consider the development site to be an appropriate location for tall building development due to the harm that would be caused to the historic environment, and the lack of strategic policy support for such development. Unfortunately, these proposals do not appear to reflect our recently updated tall buildings advice, which recommends an evidence-based and plan-led approach for such development.

The harm would be less than substantial in the terms of the Framework, but it would be contrary to the intent of the Framework's policies for the conservation of the significance of designated heritage assets, something to which great weight should be accorded (NPPF Paras 197, 199).

Such harm requires clear and convincing justification and should only be accepted if you conclude that there is such justification, and that the harm would be outweighed by the public benefits the proposals would secure (NPPF Paras 200, 202). Whilst this is ultimately a decision for your Authority, we would urge you to refuse this application and seek alternative forms of development that would avoid harming the historic environment.

- 16 February 2024

Historic England Advice

Historic England objected to the original plans for the site in February last year because of the harm we considered the 18-storey development would have on the predominantly suburban character of Penge and the surrounding area.

The revisions include a reduction in height of the tall building (Block C) from 65m to 59m, and the replacement of the red brick cladding with a buff colour, reflecting the prevailing stock brick materiality of the area.

The submitted *Heritage, Townscape and Visual Assessment Addendum* (The Townscape Consultancy, November 2023) assesses the impact of the revised plans on the historic environment which are helpfully presented alongside visuals of the original scheme. The assessment reveals that the visual impact of the revised tall building in the views we previously identified would be slightly less than the original scheme due to its lower height. The rendered views also suggest that the buff brickwork tones would slightly soften the impact when compared with the original scheme.

We therefore consider that the harm to the heritage assets we previously identified has been slightly reduced based on the updated visual assessment.

We previously identified some likely harm to the setting of the Grade II St John's Church from St John's Road, and the Aldersmead Road Conservation Area from Cator Park based on our own assessment using 3D modelling software. We note that no assessment of these views has been

provided in the amended submission. However, it is likely that the harm to these heritage assets has also been slightly reduced through the lower height of the proposed tall building.

Historic England's Position

Historic England considers that the harm previously identified has been slightly reduced through the lowering of the proposed tall building by approximately two storeys and the more complementary brickwork tones of its elevations. However, this remains a tall building development which, due to its overall scale and massing, would have harmful impact on a wide range of designated heritage assets in the area as previously set out.

Due to the harm identified, and the lack of local policy support for the development of a tall building in this location as previously set out, we remain unable to support this application. We would urge your Council to refuse this application and seek alternative forms of development that would avoid harming the historic environment.

Recommendation

Historic England continues to object to the application on heritage grounds.

4.4 Health and Safety Executive (HSE)

- 9th May 2023

Scope of consultation

- 1.1 The above planning application relates to a development containing five buildings, blocks A, B, C, D, E and F.
- 1.2 The proposed blocks comprise the following;
 - Block A has 6-storeys with ancillary accommodation (comms rooms, cycle and refuse store) and commercial space located on ground and mezzanine levels and residential dwellings on all upper floor levels (1st to 5th) and has an upper most floor height of 18.8m. The roof level comprises green roof and plant area.
 - Block B/C has adjoining towers of 9-storeys (block B – upper most floor height of 28.7m) and 18-storeys (block C – upper most floor height of 57.6m) with residential and commercial ancillary accommodation including commercial covered car park and residential/commercial plant rooms, refuse and cycle stores at ground and 1st floor levels. Commercial space is located on ground and 1st floor levels and residential dwellings on every floor level (ground to 8th (block B) and ground to 17th (block C)). There is a shared communal podium roof terrace located at 2nd floor level accessed via both block B and C stair cores. Block B/C roof levels comprise green roofs and plant areas. Eight residential duplex dwellings are accessed independently at ground floor level and there is a covered 'controlled vehicular access' to the High Street units.
 - Block D/E has adjoining towers of 9-storeys (block D – upper most floor height of 28.7m) and 6-storeys (block E – upper most floor height of 18m) with residential and commercial ancillary accommodation (including a caretaker's room and refuse and cycle stores) at ground level. Commercial space is located on ground and 1st floor levels and residential dwellings located on every floor level (1st to 8th (block D) and 1st to 5th (block E)). There is a shared communal podium roof terrace located at 2nd floor level accessed via both block D and E stair cores. Block E has a bio-solar and green roof at 4th floor level and both blocks D and E have roof top level green, bio-solar and plant areas.
 - It is noted that the 3-storey residential townhouses are located within the curtilage of the relevant buildings and are therefore within the scope of this consultation.

- 1.3 Blocks A, B, D and E are proposed to be served by a single staircase. The single staircases constitute the only escape staircase and the only firefighting staircase serving dwellings on upper floors.
- 1.4 Block C contains two staircases, one of which is a firefighting staircase serving dwellings on every upper floor level.
- 1.5 Section 6 of the fire statement confirms that the proposed non-residential space has been designed using British Standard 9999 ('BS9999'), and the residential accommodation has been designed using British Standard 9991 'BS9991'. HSE has assessed the application accordingly.
- 1.6 Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.

2. Supplementary information

The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

Means of escape

- 2.1 Section 7 of the fire statement and the relevant floor plans identify that a plant room in block B/C is located on the residential corridor at 1st floor, accessed via block B or C staircase and an Estate Management/BOH room accessed via core B residential entrance lobby. Additionally, there is a Caretaker's room located at ground floor level in block E.
- 2.2 Both blocks B and E are served by a single staircase. The fire safety standard cited in the fire statement states where a common stair forms part of the only escape route from a flat it should not also serve ancillary accommodation.
- 2.3 Additionally, if a common stair forms part of the only escape route from a dwelling it should not be connected to ancillary accommodation on the same storey as that dwelling.
- 2.4 It should be noted that reliance on past practice and precedents as the basis for new developments should not be relied upon in the context of an emerging, more stringent building safety regime. Building designs providing a single escape staircase can require compromises in relation to the convenience of occupant access to ancillary accommodation within buildings.
- 2.5 Design changes necessary to provide suitable separation of ancillary accommodation from the single staircases may not affect land use planning considerations in this instance, for example, where internal reconfiguration can remove the connections where external access is already provided, or where there is space available to provide alternative access (i.e., reduce the size of core B lobby to create a corridor providing access to the management/BOH room direct from outside). This will also be subject to later regulatory consideration.

External fire spread

- 2.6 The 2nd floor level plan of blocks B/C and D/E show communal roof terraces. Additionally, the roof level plans of blocks B and E, and the 4th floor plan of block E show proposed green/bio-solar roofs which are perpendicular to the adjoining residential accommodation walls. The external envelope of a building should not provide a medium for undue fire spread. The green roofs and terraces' construction will need to provide sufficient fire resistance to prevent fire spread to the adjoining residential accommodation wall.
- 2.7 It will be for the applicant to demonstrate that the proposed green/bio-solar roofs and terraces are viable in relation to fire safety. This will be subject to further consideration at a later regulatory stage.

Open-plan apartments

- 2.8 Section 7 of the fire statement states that "Where kitchens are to be unenclosed these shall be justified using radiation analysis, with the hob remote from the exit. Where the hob is

located such that, it is not remote from the escape route, a hob cut-off device may be required”.

- 2.9 Fire safety standards state that “the kitchen should be enclosed in open-plan flats having an area exceeding 8m × 4m. Cooking appliances in open-plan flats having an area smaller than 8m × 4m should not be adjacent to the entrance of the flat.” Cooking facilities should be located at the most remote part of the flat to protect the means of escape.
- 2.10 Design changes in this instance are unlikely to affect land use planning and will be subject to later regulatory consideration.

Hydrants

- 2.11 It is noted in section 13 of the fire statement that the usability of the existing public hydrants are “to be confirmed by the MEP engineer at a later design stage”. It should be noted that any requirement for additional hydrants may require design changes that may affect land use planning considerations relating to the landscaping of the development. This will be subject to later regulatory consideration. PV panels
- 2.12 Where the roof top installation of photovoltaic panels (PV panels) is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire.

• 6th February 2024

Scope of consultation

- 1.1. The above planning application relates to a development containing five buildings, blocks A, B, C, D, E and F.
- 1.2. The proposed blocks comprise the following;
- Block A has 6-storeys with ancillary accommodation (comms rooms, cycle and refuse store) and commercial space located on storey 1 and mezzanine levels and residential dwellings on all upper storeys (2 to 5) and has an upper most floor height of 17.7m. The roof level comprises green roof and plant area.
 - Block B/C has adjoining towers of 9-storeys (block B – upper most floor height of 29.775m) and 16-storeys (block C – upper most floor height of 51.825m) with residential and commercial ancillary accommodation including commercial covered car park and residential/commercial plant rooms, refuse and cycle stores at storeys 1 and 2. Commercial space is located on storeys 1 and 2 and residential dwellings on every storey (1 to 9 (block B)) and 1 to 16 (block C)). There is a shared communal podium roof terrace located at storey 3 accessed via both block B and C stair cores. Block B/C roof levels comprise green roofs and plant areas. Eight residential duplex dwellings are accessed independently at ground floor level and there is a covered ‘controlled vehicular access’ to the High Street units.
 - Block D/E has adjoining towers of 8-storeys (block D – upper most floor height of 26.4m) and 5-storeys (block E – upper most floor height of 16.5m) with residential and commercial ancillary accommodation (including a caretaker’s room and refuse and cycle stores) at storey 1. Commercial space is located on storeys 1 and 2 and residential dwellings located on every storey (1 to 8 (block D) and 1 to 5 (block E)). There is a shared communal podium roof terrace located at storey 3 accessed via both block D and E stair cores. Block E has a bio-solar and green roof at storey 5 and both blocks D and E have roof top level green, bio-solar and plant areas.
- 1.3. It is noted that the 6-storey residential block (block A), the 5-storey residential block (block E) and the 3-storey residential townhouses (block F) are located within the curtilage of the relevant buildings and are therefore within the scope of this consultation.
- 1.4. Blocks A and E are proposed to be served by a single staircase. The single staircases constitute the only escape staircase and the only firefighting staircase serving dwellings on upper storeys.

- 1.5. Block B, C and D contains two staircases, one of which is a firefighting staircase serving dwellings on every upper storey.
- 1.6. Section 6 of the fire statement confirms that the proposed non-residential space has been designed using British Standard 9999 ('BS9999'), and the residential accommodation has been designed using British Standard 9991 'BS9991'. HSE has assessed the application accordingly. Health and Safety Executive Previous consultation
- 1.7. HSE issued a substantive response (Content) dated 09/05/2023, under the reference pgo-3117 in relation to a consultation received on 13/04/2023.

Current consultation

- 1.8. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

Means of escape

- 2.1. Section 10 of the fire statement refers to open balcony deck approach to three flats at storey 2 to 6 of block A. Floor plan drawings illustrate the open balcony deck, adjoined the building wall where flat entrances are present, to be over 2m in width. Escape from each flat is by way of single direction of travel.
- 2.2. Consideration should be given to the risk of smoke logged balconies due to a fire incident in an adjoining flat and the probability of smoke spread laterally to the balcony ceiling and vertically to upper balcony levels. The adopted fire safety standard BS9991 states: "The soffit above a balcony or deck having a width of more than 2 m should be designed with down-stands placed at 90° to the face of the building (on the line of separation between individual flats or maisonettes). Down-stands should project 0.3 m to 0.6 m below any other beam or down-stand parallel to the face of the building, or should be determined by calculation. Where the balcony or deck is adjoined to the building wall only at the place where there is an entrance to a flat or maisonette, unless it is a minimum of 1.8 m away from the face of the building, it should, in the case of single direction escape routes, be proven by calculation that the escape route is not subjected to hazardous exposure levels or smoke-logging."
- 2.3. Design changes may affect land use planning considerations relating to the appearance of the building where, for example, provision of soffits are necessary and it will be for the applicant to demonstrate compliance at later regulatory stages. Health and Safety Executive Fire service access and facilities
- 2.4. Section 10 of the fire statement states that blocks A, D and E have provision of dry fire mains and blocks B and C having provision of wet fire mains. HSE notes that the location of staircases is remote from the external wall, therefore the riser inlets on the external elevations of each block will require the use of a horizontal pipe run to connect with the vertical run of the main.
- 2.5. Fire safety standard BS 9990:2015 states: "Any proposed use of horizontal fire mains should be discussed and agreed with the local fire and rescue service."
- 2.6. It is also noted that the design proposal for blocks B, C and D includes one fire-fighting shaft and one protected stair. It is unclear if the dry/wet riser inlet provided serves both risers or if there is access to two separate riser inlets serving individual risers.
- 2.7. BS 9990:2015, clause 4.2.3 states; "for large buildings or sites comprising multiple buildings, multiple horizontal or vertical fire main pipework runs should not be served from the same inlet connection."

2.8. This matter may be resolved by way of internal alterations, which would be unlikely to affect land use planning considerations and will be for the applicant to demonstrate compliance at later regulatory stages.

4.5 London Fire Brigade

- 13th October 2023

Fundamental concerns relating to single stair for Block A 1.

We note that the design is for a tall residential building relying upon a single staircase. While it may not be appropriate for detailed design following a framework such as that set out in BS 7974 (including a qualitative design review – QDR) to be undertaken at the planning stage, the lack of multiple staircases for a building of this height is not an aspect of the design which, in our view, should be left until the Building Regulations consultation process to resolve. Therefore, further justification should be provided at this stage which demonstrates that the principles of the London Plan 2021 will be met.

In our opinion the information provided by the applicant at this stage should recognise that the further design analysis is required later, and that if the BS 7974 analysis including a QDR determines that additional facilities are required such as an additional stair, then the project may need to return to planning for review of those changes.

The National Fire Chiefs Council have issued a policy position statement indicating that in their view residential buildings of 18 metres or of at least 7 storeys, must become the threshold at which more than one staircase should be required in new residential buildings. We further draw your attention to the recent announcement from government stating their expectation that multiple staircases will be required in residential buildings above 18m. While the transitional arrangements are not yet available, and may not apply to this particular development, the intent of government is clear that the 18m threshold will be introduced and that the timeframe for introduction should be short.

Design teams and developers should be planning for the new requirements under the Building Safety Act for in scope buildings once occupied, including the need to provide a safety case review. The design as currently proposed may have implications on those responsible for demonstrating the ongoing safety in the building.

Fundamental concerns relating to single stair for Blocks B, D & E 2.

We note that the design includes the following features not supported by fire safety guidance and which, in our opinion, are not compatible with a single stair design:

- Amenity spaces at height, their connection with residential means of escape or potential conflict with the proposed ‘stay put’ design strategy for the residential accommodation.

This is relating to the shared amenity spaces for Blocks B/C and D/E. In our opinion, the planning authority should not consider these aspects appropriate given the reliance on a single staircase for occupant’s means of escape, and we question how the principles of the London Plan 2021 have been met by this design.

The National Fire Chiefs Council have issued a position statement indicating that in their view residential buildings of 18 metres or of at least 7 storeys must become the threshold at which more than one staircase should be required in new residential buildings. We further draw your attention to the recent announcement from government stating their expectation that multiple staircases will be required in residential buildings above 18m. While the transitional arrangements are not yet available, and may not apply to this particular development, the intent of government is clear that the 18m threshold will be introduced and that the timeframe for introduction should be short. Design

teams and developers should be planning for the new requirements under the Building Safety Act for in scope buildings once occupied, including the need to provide a safety case review. The design as currently proposed may have implications on those responsible for demonstrating the ongoing safety in the building.

Ensuring suitable means of escape for all occupants in open plan apartments

We note that the proposal is to include open plan internal flat arrangements where the kitchen and in particular the cooking appliance is positioned in close proximity to the internal escape route and the flat entrance door. Guidance (ADB V1 paragraph 3.18 and BS 9991:2015, clause 9.1) recommends that cooking facilities are remote from the main entrance door and located in such a way that they do not prevent escape if they are involved in a fire. In this case, we note that the location of the cooking appliance is close to the door and that an assessment has been carried out in the form of a radiated heat analysis, in order to demonstrate its suitability. While we acknowledge that this is primarily a matter for the approving authority, it is our view that other factors should have been considered in the assessment, some of which are detailed in a – e below:

- a. the human behaviour e.g., willingness to pass a fire;
- b. the (accumulated) radiated heat, toxicity, and time period for which they will be exposed;
- c. the potential fire spread;
- d. the visibility conditions;
- e. the requirement for an early warning of a fire which meets the recommendations of BS 5839 part 6 with regards to the inner room protection e.g., a smoke detection should be positioned in all access rooms and along the means of escape.

It is therefore our opinion that any analysis carried out should include the above factors and suitably demonstrate to the approving authority that the facilities are remote from the main entrance door and do not impede the escape route from anywhere in the flat.

Evacuation lifts for Blocks A, B, C, D & E

We note the proposal to include an evacuation lift, however, there should be sufficient numbers of evacuation lifts provided so that if an evacuation lift is out of service (e.g., as a result of breakdown or maintenance), there is at least one that is still available for use from all areas of the building. Therefore, we question how London Plan 2021 Policies D5 and D12 have been met in this regard. Design teams and developers should also be planning for the new requirements under the Building Safety Act for in scope buildings once occupied including the need to provide a safety case review. The design as currently proposed will, in our view, have implications on those responsible for demonstrating the ongoing safety in the building.

Access and facilities for the fire and rescue service for Blocks A, B, C, D & E

We note the proposal to include a firefighter's lift, however, there should be sufficient numbers of firefighters' lifts provided so that if a firefighter's lift is out of service (e.g. as a result of breakdown or maintenance), there is at least one that is still available for use from all areas of the building. Therefore, the level of provision should be reviewed for this design.

4.6 Environmental Agency – No Objection

- 3rd February 2023

We have reviewed the submitted information and have no objection to the proposed development. We note that the proposal is located atop a secondary (undifferentiated) aquifer, and the previous use of the site represents a medium risk of contamination. As such, please consider the following advice when determining this application. Advice to Local Planning Authority and Applicant Land Contamination The Guiding Principles for dealing with Land Contamination is available on

<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>. We recommend as best practice that all site desk study, site investigation, remediation strategies and verification reports submitted for planning purposes are undertaken by a suitably qualified person, preferably registered as a SILC/SQP. We recommend that for brownfield site developments – especially on sites with higher risk previous uses – desk study reports, site investigations, remedial strategies and verification reports are signed off under the National Land Quality Mark Scheme (NQMS). The NQMS is a system designed by the industry-led Land Forum to ensure that land contamination management work meets the necessary standards. It applies in particular to the presentation of environmental information to the regulator in the form of reports setting out both factual and interpretative information. Under the scheme, reports are prepared in line with good practice and signed off by a suitably qualified and experienced person registered under the NQMS who aims to ensure that:

- The work has been planned, undertaken and written up by competent people who have relevant experience and/or qualifications in their respective disciplines
- The underlying data has been collected in line with established good practice procedures and its collection has been subject to control via established quality management systems
- The data has been processed, analysed and interpreted in line with established good practice and any specific advice provided by the relevant regulatory authorities or regulatory bodies
- The reports set out recommendations or conclusions that are substantiated by the underlying data and are based upon reasonable interpretations
- Any limitations in the data or uncertainties in the analysis are clearly identified along with the possible consequences of such limitations. If developments are supported by NQMS reporting we can assume that the local planning authority has the necessary information to allow decisions to be taken without the need for additional site-specific advice from us. We can recommend that you take account of the conclusions and recommendations within an NQMS report. If you need further support understanding the report, please seek advice from your Environmental Health/Environmental Protection Department who will be able to advise on the generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that you seek to integrate any requirements for human health protection with those for protection of the water environment. This approach is supported by paragraph 174 of the National Planning Policy Framework and the Water Framework Directive, which places such duties on all public bodies. We also recommend that you consider the merits of advising the developer to handle any further land contamination management work that may be required under the NQMS. Any unexpected contamination encountered during development of a site should be reported to the Environmental Health Officer (EHO) in accordance with Building Regulations Approved Doc C. Foundation Design and Contamination Piling can result in risks to groundwater quality by mobilising contamination when boring through different bedrock layers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater. If piling is proposed, a Piling Risk Assessment should be undertaken to confirm the proposed design does not pose risks to the groundwater, this should be in accordance with EA guidance document “Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73”. Drainage Design and Contamination Any SuDs design for clean roof drainage should be through sealed trap gullies and only sited in areas of clean naturally occurring materials in accordance with building regulations Approved Doc H (link below) and good practice design guidance (CIRIA R156). All infiltration drainage from roads and service areas that bypasses the upper soil layers via soakaway chambers or boreholes may require a permit to discharge to ground, unless additional pollution prevention measures are installed that prevent contaminated water reaching the aquifer body. Drainage may be restricted in a source protection zone or over an aquifer where groundwater is at shallow depths.

Foul drainage should be discharged to mains sewers where possible. Developers should check <https://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h> for Binding Rules information for small scale non mains discharges. Submissions to the LPA should include all relevant information on foul drainage proposals using the following form: <https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1>

Treated discharges to ground or surface waters may require an Environmental permit. Engineering works Any excavation and re-profiling works on closed landfill sites are likely to require an Environmental permit. Any new engineering works on permitted landfills will require appropriate variations to the permit as well as planning permission. Soils and Stones The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides developers/operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works can be sustainably re-used under an industry agreed Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution in accordance with an approved remediation strategy.
- treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the EA for a set number of development sites.
- some naturally occurring clean material can be transferred directly between sites for agreed re-use. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. The Environment Agency recommends that developers should refer to:
 - the Position statement on the Definition of Waste: Development Industry Code of Practice and;
 - The Environmental regulations page on GOV.UK Wastes Removed from development sites.Contaminated materials that are (or must be) disposed of are waste. Therefore, the handling, transport, treatment and disposal are subject to waste management legislation, which includes:
 - Duty of Care Regulations 1991
 - Hazardous Waste (England and Wales) Regulations 2005
 - Environmental Permitting (England and Wales) Regulations 2016
 - The Waste (England and Wales) Regulations 2011Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. Refer to the hazardous waste pages on gov.uk for more information.

- 5th February 2024

The proposed changes do not change our advice, and therefore, we refer you back to our previous comments for our formal response to this application.

4.7 London Borough of Croydon – No Objection

Comments: In order to fully assess whether LB Croydon's roads would be affected as part of the construction process, the Council requests to be consulted as part of the Construction Logistics Plan, pursuant to any planning permission granted.

4.8 London Borough of Lambeth – No Objection

1 The applicant is advised of the necessity to consult the Highways team, with regard to any alterations affecting the public footway/ carriageway. You are required to liaise with the Highways team should any of the following be required;

Notification of neighbours with regard to specific works;

Advance notification of road/ footway closures; and

Any other impacts of construction upon the amenity of the area and the function and safety of the highway network (including parking on the footway, or extended loading on the carriageway). The developer is to contact Lambeth Council's Highways team on 020 7926 9000 / drw@lambeth.gov.uk , prior to the commencement of construction, to arrange for any such work to be done.

4.9 London Borough of Lewisham – No Objection

Impacts on Lewisham’s Conservation Areas

- No view points from within LB Lewisham have been included in the THVIA study, and it is not clear whether any such views have been tested and scoped out.
- Most views of the development from within LB Lewisham are likely to be obscured by intervening built form and topography.
- The development may be visible however from a number of points within the Sydenham Hill & Kirkdale Conservation Area (CA). This CA stretches across the high ground of the Sydenham Ridge, and has spectacular open views to the south. There is no CA Appraisal for this CA but its position on the ridge is a key characteristic and the views to the south are an important element of its wider setting.
- It is advised that LB Bromley should ask the applicant to provide an assessment of likely visibility from the following locations:
 - The junction of Sydenham Hill and Kirkdale
 - The junction of Kirkdale and Mount Ash Road
 - Through the gap at the south eastern corner of the green open space within Lammas Green (a 1950s estate comprising listed buildings around a green, with a gap between buildings at the south east corner allowing expansive views to the south. (See listing refs: 1246822, 1246819, 1246890, 1246821, 1246889, 1246820).

Transport impacts

- It is noted the proposed construction routes will travel via strategic routes in Lewisham notably the A212 Sydenham Road and A2216 Kirkdale. The wider route plan does not show any other Lewisham Borough roads that are impacted.
- The wider map (Figure 8.3 ‘Logistics Routing’) submitted is limited (for Lewisham’s review and the impact on the borough). Lewisham highways would request that a wider plan is provided to show all Lewisham Borough roads including any strategic TLRN roads that will be impacted by construction delivery routes. Lewisham highways also requests the estimated number of vehicles expected. It is understood that this an early stage prior to contractors being on board however estimates can be provided at this stage.
- Additionally, the outline CLP states *“Where possible vehicles will be restricted to avoid school drop-off and pick-up times. LBB will be notified if any exceptional circumstances arise”*
- Lewisham highways requests that if any routes pass schools within the Borough that all deliveries should take place outside of school pick and drop off times.

4.10 National Grid – No Objection

There are no National Grid Electricity Transmission assets affected in this area.

4.11 Natural England – No Comments

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory

designated nature conservation sites. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

4.13 Thames Water – No Objection

Waste Comments

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission:

No development shall be occupied until confirmation has been provided that either:

1. Foul water capacity exists off site to serve the development, or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or
3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development.

Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval. With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission:

No development shall be occupied until confirmation has been provided that either:

1. Surface water capacity exists off site to serve the development or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or
3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development.

Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water

Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission.

No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide [working near our assets to ensure your workings will be in line with the necessary processes you need to follow if you are considering working above or near our pipes or other structures.](https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes)

<https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We will need to check that your development does not limit repair or maintenance activities, or inhibit the services we provide in any other way.

The applicant is advised to read our guide [working near or diverting our pipes.](https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes) <https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes> We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: [A Groundwater Risk Management Permit](#) from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

Thames Water are currently working with the developer of application 23/00178/FULL1 to identify and deliver the off-site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 100 dwellings but beyond that upgrades to the water network will be required. Works are on-going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development does not outpace the delivery of essential infrastructure.

There shall be no occupation beyond the 100th dwelling until confirmation has been provided that either:

- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or

- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied.

Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval. The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide on working near our assets to ensure your workings are in line with the necessary processes you need to follow if you are considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we will need to check that your development does not reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Supplementary Comments Waste

We have been engaging with the developer and have produced and agreed a drainage strategy for this development, however this information is not on the council website. Once this information has been uploaded to the planning portal, we will be in a position to formally change our response.

b) Non-statutory

• The Victorian Society - Objection

16th February 2023

The Victorian Society's attention has been drawn to this application. Having reviewed the documentation, we object to the proposals.

This site is situated close to the centre of Penge and the Penge High Street Conservation Area and other designated and non-designated heritage assets. Penge has a long history but saw significant development from the early 19th century onwards with the arrival of the Croydon Canal and railway which transformed it into a suburban hub. Despite serious bomb damage in the second world war, the area retains many 19th century buildings and is strongly characterised by its low-rise urban fabric.

The architectural and historical value of the area surrounding the site is recognised in the designation of two Conservation Areas. Penge High Street, which borders the site, and Alexandra Cottages, a short distance to the north. There are also listed buildings nearby such as 1840s The

Royal Watermen's and Lightermen's Asylum, and non-designated heritage assets: the former Penge Police Station and St John's Cottages, both dating from the 19th century.

This proposal would see the demolition of a late 20th century carpark and its replacement with a new development of commercial and residential units in a series of buildings between 3 and 18 storeys. The Victorian Society in principle accepts the suitability of the site for development and recognises that a high-quality scheme could deliver benefits for the local area. However, the proposal's height and quantum of development raise serious concern.

Penge has a strong urban character interspersed with buildings of high significance, generally constructed on a low scale. The introduction of buildings up to 18 storeys would seriously harm the character of the area and the setting of the Penge High Street Conservation Area and nearby listed buildings. Buildings of such a height would be completely out of character with their surroundings and overshadow nearby significant buildings. They would also introduce a dangerous precedent for future development in the area. It is also unclear how the proposal may affect important views of Penge from Addison Hills.

The NPPF states that: 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance' (para 206).

This proposal would not enhance the setting of the Penge High Street Conservation Area, nor the setting of other heritage assets. We recognise that the Bromley Local Plan highlights the area for renewal, but this does not equate that tall buildings are justified. The Bromley Local Plan states: 'Much of the Borough is not considered appropriate for tall buildings due to the established suburban character of the Borough. However, potential may exist for such development to be considered in town centre locations which benefit from good public transport, exhibit an existing local built character that would allow for taller buildings, and where no harm would be caused to heritage assets, the wider historic environment or important views.'

The Local Plan and Bromley Town Centre Area Action Plan go on to state that town centre locations, specifically 4 sites in Bromley Town Centre itself, may be suitable for tall buildings, albeit with the caveat 'the Council is committed to ensuring that the height and density of new development is, wherever possible, kept to a minimum.' It is evident that locations in Penge town centre are not considered suitable for tall buildings. This proposal would be harmful to the historic character of Penge and the setting of nearby designated and non-designated heritage assets. We urge your authority to refuse this application unless very substantial amendments are made which would see a development on a scale appropriate to its sensitive surroundings.

23rd February 2024

We submitted an objection previously on 16th February 2023, which we maintain.

The applicant has amended the proposal with small reduction in the heights of the proposed new buildings. However, these amendments do not alter the fundamental character of the proposals, and therefore our concerns remain. We reiterate below the comments we made in our original objection:

This site is situated close to the centre of Penge and the Penge High Street Conservation Area and other designated and non-designated heritage assets. Penge has a long history but saw significant development from the early 19th century onwards with the arrival of the Croydon Canal and railway which transformed it into a suburban hub. Despite serious bomb damage in the second world war, the area retains many 19th century buildings and is strongly characterised by its low-rise urban fabric.

The architectural and historical value of the area surrounding the site is recognised in the designation of two Conservation Areas. Penge High Street, which borders the site, and Alexandra Cottages, a short distance to the north. There are also listed buildings nearby such as 1840s The Royal Watermen's and Lightermen's Asylum, and non-designated heritage assets: the former Penge Police Station and St John's Cottages, both dating from the 19th century.

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This proposal would be harmful to the historic character of Penge and the setting of nearby designated and non-designated heritage assets. We urge your authority to refuse this application unless very substantial amendments are made which would see a development on a scale appropriate to its sensitive surroundings.

- **Advisory Panel for Conservation Areas - Objection**

7th March 2023

While the existing centre is very poor in its design and concept these replacement scheme, in particular the taller element, is seriously alien to the predominantly low-rise Victorian character of

the immediate area and to the setting of the adjacent Conservation Area and other nearby CAs due to the dominant scale and sprawl of the proposals. The design of the taller element is a generic tower block with repetitious detail with no apparent reference to local character or distinctive . It is visible in both nearby and distant views and seriously detracting from the intrinsic character of the adjacent CA and wider areas. There is clear overshadowing in many parts and detriment to the skyline particularly in views from the listed Watermans Alms Houses as clearly illustrated in the applicant's own documents and likely in the long distant protected view from Crystal Palace Park Conservation Area towards Penge, Beckenham, Bromley and many other Conservation Areas. The proposals do not reflect the Development Plan and given the impact on surroundings clearly needs a masterplan not just in relation to aesthetics but also relation to the housing and commercial implication for the wider area car parking considerations in terms of losses and increase pressure on local streets as well as impact on infrastructure.

Draft Supplementary Design Guide: It is noted that the draft guide stresses the need for new development to respond positively to context and existing character which the proposed scale, bulk and design of the development fails to do both in relation to the Section 5 Tall Buildings Guidance (particularly as Penge is neither a Metropolitan nor Major Town Centre as classified in the Local Plan) or in the terms summarised in draft policy DG1.

We do not believe whatever perceived public benefits from the scheme outweigh the obvious harm to the immediate setting of the adjacent Town Centre Conservation Area, setting of other adjacent Conservation areas or setting of Locally and Statutorily Listed buildings within or adjacent to the site. Policies 37 , 38, 39, 41, 42, Draft Urban Design Guide SPD .

Note: the applicant's visuals are based on wide angle photos which create a false impression of diminishing scale in relation to background and foreground i.e. the impact of the scale of the development will be much greater in reality than that shown.

- **CPRE London - Objection**

16th February 2023

"CPRE London is a membership based charity with 2500 members across London, concerned with the preservation and enhancement of London's green spaces. As part of this, we recognise the need for new development to go on brownfield and previously poorly developed sites.

We appreciate that there is a housing crisis and that people need affordable homes - but we believe this should be achieved through gentle increases in density not the building of soaring tower blocks.

In its current form, this proposal for an eighteen-storey tower is not an example of best practice in gently increasing population density but rather of town cramming. The scale of this development should be dramatically cut to more in the region of 5 to 8 storeys at the absolute maximum.

We are therefore writing to object to the above application in its current form on the following basis:

- Visual impact of the development. This eighteen-storey high-rise development will be overbearing, completely out of character with the surrounding Victorian streets and will have a visually adverse impact on the nearby Penge Conservation Area. It is contrary to Policy 42 of the Bromley Local Plan which 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'.

- Loss of light / overshadowing: A significant number of nearby properties and streets will be adversely affected by a severe reduction in daylight due to shadows cast from the new tower blocks. This could be mitigated by placing taller blocks at the north end of the development, though we would not support blocks higher than 8 storeys.

The area is grey, run down, and suffers from high levels of air pollution, is deficient in green space and impacted by a main road. So planning consent should be conditional upon provision being made

and funded for new grassy public open spaces and outdoor sports facilities for residents, for example:

- A publicly accessible garden on the roof of the block has the potential to be a wonderful new green space for Penge which would soften the visual impact of the new building, while also giving local residents an opportunity to enjoy the wonderful views which can currently only be enjoyed from the top of the car park.

- Grey space, under-used roads, and even whole streets or sections of streets, surrounding the development could be converted to new rain gardens, pocket parks or streetparks (as has already been done successfully at Alfred Place in Camden).

- Nearby sites could be improved and/or enlarged to ensure there is enough good quality green space for all residents.

There are of course environmental benefits of encouraging car free living in cities. This site is well served by public transport being in easy reach of Penge East, Penge West and numerous bus services. However, clear plans will need to be in place to strengthen services further to keep up with increased public transport demand and it would be desirable to consider whether there is scope for improved pedestrian routes in the area. Wider use of controlled parking will also be needed.”

c) Local groups

- Alexandra Residents' Association – Objection

15th March 2023

1. Summary of Objections

Planning Officers and members of the council will doubtless be aware that the proposed redevelopment of the Blenheim Centre has generated massive opposition across the local community and this is reflected in the views of residents of the Alexandra Cottages. Many residents have commented as individuals but the Alexandra Residents' Association wishes to add a collective objection to the current proposals. The Association represents residents of the area off Parish Lane covering Albert Road, Edward Road, Hardings Lane, Princes Lane and Victor Road. There are just under 200 properties making up the Alexandra Cottages Conservation Area and they are a much-loved locale typifying the low rise suburban fabric of Penge threatened by the proposed development. While there are legitimate discussions that could take place about the provision of housing units in Penge (especially for affordable/social rent tenancies) and for making better use of the space covered by the proposals we wish to categorically state that this development is not an adequate answer to either issue. The association therefore adds its voice to the many hundreds of others demanding that this proposal be rejected and that plans for the site be reconsidered using the borough's Local Plan as the basis for any future proposal. While we are clear that the plan proposed would be unacceptable over development we would also urge the council to reject suggestions to implement the plans in part. The reasons why we consider them fundamentally flawed even in a reduced form are described below.

2. Context

We contend that development in local communities should be guided by the borough's Local Plan on which wide consultation takes place and competing priorities are weighed leading to measured and evidence-based conclusion and the identification of locations for major projects. Although Penge is identified as a 'renewal area', the current Local Plan (agreed in 2019) does not suggest any consideration of a development of this scale in the Penge area and hence we fear that the impact of this number of new residential units in the area on health, education and transport services has not received the formal consideration that the council must surely require.

3. Comments on Claims Made in the Planning Statement

Section 9.2 of Full Planning Statement sets out what the developers suggest is a 'Planning Balance' that they argue supports the development going ahead in spite of what they admit (but don't wish to describe) are negative 'impacts on the surrounding area in terms of height, amenities, and transport'. We wish to contend the majority of points set out in this list and hence that the balance lies significantly against the proposed development. Specifically those set out below where the numbers refer to direct quotes from Section 9.2:

3.1 'The optimisation of an accessible and under-utilised brownfield site located at the heart of an Area of Renewal and Regeneration'

We argue that the idea that the proposal optimises the site does not stand up to even basic scrutiny. The balance of excessive residential to diminished retail uses will lead to significant detriment to a thriving high street characterised by small scale units working in synergy with the three large anchor tenants of the Blenheim Centre. With only one of these likely to remain the impact on the rest of the retail ecosystem is likely to be significant and has been almost completely ignored by the developers. Additionally, while we are not planning experts, the common understanding of a 'brownfield site' is a previously developed site not currently in use; while the amount of car parking exceeds current need we would absolutely disagree that the current site in its totality does not represent an asset valued by the community, something borne out by the huge volume of objections that have been lodged.

3.2 The provision of 250 new homes

Both for heritage reasons (set out below) and because the strain on local services and infrastructure would be intense we contend that the site cannot possibly bear anything like 250 new residential units. This could only be achieved at very significant detriment to immediate neighbours and by permanently changing the skyline and character of one of an increasingly small number of cohesive suburban neighbourhoods in London. The comments and objections by Historic England go to the heart of this matter and we fully support those and set out our similar views from the perspective of a conservation area below. Furthermore we contend that the proportion of homes available for those in housing need is inadequate – social rent properties make up only a small proportion of the unit proposed given that shared ownership contributes a significant part of the developer's 35%. In passing we also note the poor reputation nationally and locally of Clarion Housing Association, something we have had cause to see first hand with disputes where the Alexandra Cottages has a border with properties they manage. The preoccupation of the Greater London Authority to provide housing of any description, whilst frequently ignoring/overriding their own balancing policies on design, heritage, economics, environment and sustainability, has led to a skewed consultation process. The fundamental objections from the GLA to this overdevelopment have therefore not been met by the developer or their design team, and the balance of harm far exceeds any purported public benefit. The GLA is at risk of creating a circular economy of overdevelopment on inappropriate opportunity sites, due to its unfair demands for so called 'affordable housing' which has to be subsidised by excessive private housing/flats (typically up to 65%), which in turn result in large Community Infrastructure Levy (CIL) and affect the viability. More private units are then required, which ups the affordable element and CIL, and the cycle perpetuates itself. London needs affordable housing, not overpriced private housing/flats, which lead to gross overdevelopment and serious detriment to local communities. The conclusion is that up to 250 homes is too many for this site, location and demographic, and provision should be encouraged elsewhere where it is sustainable. If the redevelopment had been a re-provision and enhancement of the commercial element, together with new provision of the affordable housing element only (at approximately 87 units based on 35% of the original inflated total), with realistic number of car parking spaces to serve the high street, tenants and additional households, and major greening and opening up of the public realm, then the height, scale and massing of the proposals would be appropriate and sustainable.

3.3 The provision of high quality homes meeting high design standards:

We fundamentally disagree that the proposal represents high design standards. The sheer volume makes this very unlikely and the rushed revisions to plans to address inadequate routes for exit in the event of fire call into question the fitness for purpose of the proposal and lead to the inevitable

conclusion that developers are seeking to maximise revenue by squeezing a constrained site beyond what it can possibly sustain. The proposed predominance of single aspect flats with meagre amenity space and low grade outlook immediately onto service yards/road and backs of commercial properties with ugly and smelly extraction ducts/flues, renders most of the development unsuitable for residential use. The allocation of flats for the affordable housing sector will be the lowest grade accommodation and this is felt to be discriminatory and unsustainable. Please refer to Appendix 2 to see photographs of typical views for those in flats immediately facing Croydon Road, Penge High Street and Burham Close/Post Office Sorting Office Yard, where no spatial, visual and/or environmental mitigation is planned as part of the overdevelopment of the small 7 hectare site. The 'design' is considered shoe box architecture with stick on cladding and balconies, to meet the unrealistic quantity of residential units and the natural confines of the site and local context. The design review, by Frame, had to work from the perspective of 'damage limitation' due to the unrealistic demands of the proposed enormous overdevelopment, and the overriding issue of excessive scale, massing and adverse impact on context was never addressed in any minor design reiterations. The combination of poor design, space, outlook, day/sunlight, amenity, tenure, services, connectivity, render this overdevelopment unacceptable in their own right but when combined with the serious harm to the townscape of Penge, its neighbours and communities the case for refusal of this planning application is overwhelming.

3.4 A range of innovative uses to support the local community:

These seek to offset the obvious harm of the over-massive proposal for residential units yet in practice the non-residential spaces are less suited to the needs of the Penge Community than those that exist currently in particular the reduction in retail space. In the view of residents of the association the loss of value outweighs any gain from the proposed gym and the high street already has sufficient food and beverage outlets. There is nothing innovative about this scheme or the uses. The purposed new public square is a paltry 15m x 13m (less than 200sqm) with limited day/sunlight, and scarcely bigger than Appleton Square or the Penge Triangle which are rarely, if ever, used for events due to their small size and through routes.

3.5 The creation of a new civic public square and improved permeability in all directions;

The use of the site is too cramped to achieve any significant benefits in this regard. Any public areas will have limited light due to the massive buildings surrounding them and subject to air turbulence from tall buildings. Similar areas in other parts of London are not in practice widely used in our view and add limited value compared to traditional parks. Our specific questions on the Landscape Plan which seem unresolved include:

- Promotional video shows this area, Blenheim Square, as sunny and being enjoyed by public. How much sun will this area get especially outside of summer months. We think very little.
- With the height of these building has an assessment been made of the 'wind tunnel effect' on this area and the project in general.
- Permeable paving shown on some areas only, why not universally within project e.g Evalina Rd. Flooding is an increasing issue.
- Planting schemes are unclear on planting depths for trees and shrubs for both public domain and roof planting. Trees need at least 1000mm of soil and shrubs between 300-450mm. Can this be clarified.
- What provision will be made for access for maintenance of roof planting.
- Will it have automatic irrigation?
- Who will be maintaining the public domain planting?
- What is the establishment period? *[period after which regular watering can stop and any stakes etc can be removed]?
- What requirements will be in place for replacement planting during the establishment period?

3.6 Providing a Sustainable Car Free Scheme

Our view that this is nowhere near demonstrated by the proposals and merely removing provision for car parking will not lead to a scheme being 'car-free'. In practice residents of the new units will continue to use cars for some years to come just as other residents of Penge will. The parking

demands this will lead to will mostly impact streets closest to the development but will undoubtedly ripple out including to the streets that make up our conservation area. There is no commitment or indication that public transport enhancements will follow the arrival of many hundreds of new residents; off peak and weekend train services from Penge East show no sign of returning to pre pandemic levels while overground and local buses are already often overcrowded. In conclusion we consider this statement to be wishful thinking with very little basis in the reality of the proposals.

4. Detrimental Impacts

The 'Planning Balance' statement acknowledges that there will be negative impacts though conveniently declines to list them. While we have observed that the positive aspects claimed do not stand up to scrutiny the list of negative impacts is substantial.

4.1 Heritage and Planning Detriment:

The seven part Design and Access Statement, prepared by architects FCBS, is inadequate as it provides insufficient explanation of the 'Design' or 'Access' and is largely a rehash of the main architectural and landscaping plans and elevations of the existing and proposed, with vague outlining of the existing townscape topography. No specific context is given to the proposed massive development and its overwhelming impact on that townscape or any of the historic and architecturally important buildings, complexes, views and conservation areas. The strategy on natural ventilation, lighting and solar shading is also missing or buried in other documents. The three part Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy is wholly inadequate and misguided in all of the required responses. The selection of viewpoints is unrepresentative for all of the detrimental impacts of the massive intervention within historic Penge and the medium to long ranging views from its surrounding routes and neighbourhoods. The proposed development is so huge that the 18 storey tower and flanking 7 storey wings do not even fit onto the CGI view from the High Street, through the narrow existing Empire Square, providing a telling example of gross overdevelopment and over shadowing of a modest, consistent and historic townscape. The image of this narrow roadway, formed into a pedestrianised street to the 1970's shopping centre and carpark, and renamed Empire Square (which is in fact a slim rectangular route rather than a usable public square), with the proposed redevelopment behind, has been used extensively in the limited consultation process and throughout the current planning application. It gives a false impression of width and scale, and omits to show the full impact on the historic environment and public realm. The assertion that the design and materials compliment the character and appearance of low rise (typically 2 to 3 storey Victorian and some Georgian, with limited post war infill of similar scale) Penge is without any substance or justification. The proposed use of yellow and red brick up to 18 storeys in the air and regimented facades is completely out of keeping with the historic landscape and buildings of Penge. The Heritage, Townscape and Visual Impact Assessment concludes that Views 10, 17, 18, 20 & 23 improve on the existing street scene, which we would contest in most instances. The statement therefore implies that all of the remaining views are not improved, and we would strongly concur with this fact. We are particularly concerned about the detrimental impact on the following views and the appreciation of these heritage and community assets, without undue distraction:-

- Waterman Square – View 3a,b & c
- Alexandra Cottages – View 4
- Barnmead Road – View 7
- High Road/Congregational Church/Kenwood – View 8
- Penge High Street – View 9a & b
- Croydon Road with Evelina Road – View 10
- High Street – View 18
- Crystal Palace Park – View 19 where more representative views should be included
- Southey Street – View 21
- Green Lane – View 22 and missing views:-
- St Johns Church/St Johns Road
- Aldersmead Road/Cator Park
- Penge War Memorial

- Former Police Station (front elevation)
- St Johns Cottages

We fundamentally disagree that the 18 storey residential tower and its flanking blocks are a pointer to the centre of Penge and new public square, as the core of Penge is already defined by its coherent and historic high street and iconic landmarks such as the Listed Lighterman's and Waterman's Almshouses with accompanying Waterman Square, and board stone spire of St Johns Church. The argument to celebrate an incongruous modern residential tower, of no particular architectural merit or positioning and over domination of the historic and cohesive townscape is untenable, especially as the public space alluded to would be dark and windy small pocket of near unusable space and amenity. The assessment of Tall Buildings in this location is completely flawed and does not follow the latest guidance from Historic England, with all of the required criteria unmet by the wishful and naive responses. We fully endorse the Historic England Advice, regarding this planning application, in respect of Significant of the Historic Environment, The Proposals and their Impact, Relevant Legislation, Policy and Guidance, Historic England's Position and Recommendation. Copy of letter dated 21st February 2023 by Alasdair Young (Inspector of Historic Building and Areas) is attached as Appendix 1 to this ARA objection for convenience and reference. The concerns particularly affecting our conservation area are highlighted in yellow, but we have major concern for all conservation areas/historic assets, and identity of our town of Penge. We are shocked and disappointed that the developer or their design/planning team did not engage or consult with Historic England on this clearly important and contentious application affecting the historic environment. We feel significant weight should be afforded to their admirable submission and firm objection.

4.2 Impact on Immediate Residents:

Many of those living closest to the site are likely to have objected themselves but we wish to add weight to the views of those whose day to day lives will be significantly impacted and to remind decision makers that they should not be ignored or considered an inconvenience as seems to permeate the proposal. In particular we find the document that identifies impact in terms of access to natural light deeply concerning in the way it suggests:

- A self-defined reduction in the required level of light that properties should be entitled to (a vague allusion to how reducing the published limits to just 15% could be acceptable);
- A recognition that a significant number of adjacent properties would not even meet this arbitrarily reduced level.

More broadly anyone living on or close to Penge High Street, including residents in the area bordered by Maple Road, Franklin Road and Croydon Road will find their immediate outlook dominated by a building completely out of keeping with the skyline of the area and as observed above this impact will be felt by those living considerably further away. The sheer scale of the proposed overdevelopment has far reaching consequences, beyond the impact on immediate residents, and would change the character, skyline and appreciation of Penge as a place and community. It is almost unprecedented that one massive potential development would blight six local conservation areas (Penge High Street, Alexandra Cottages, Barnmead Road, Aldersmead Road, Cator Road and Crystal Palace Park) together with Listed buildings and churches (including The Royal Waterman's and Lighterman's Almshouses, The Royal Naval Asylum – King William IV cottages, St John's Church, Congregational Church, White House, Penge War Memorial, Penge East Station) and Locally Listed buildings (such as the Alexandra Cottages, 101a Parish Lane, St Johns Cottages, Former Police Station and Harris Academy – Kenwood) .

4.3 Social, Economic, Community and Health Impact: This section covers less than a page of the Planning Statement with a supplementary annex but is a major area in which we have concerns about the proposals. Access to GP and other primary health services is already an issue in the area and we contend that this proposal is likely to exacerbate this and to create issues for local primary schools in terms of meeting the needs of new residents. We presume that a proposal of this sort would normally include a 'Community Infrastructure Levy' and while that would not be hypothecated to be solely spent in the area in which the development takes place we see little evidence that any

funding is being committed by the London Borough of Bromley or other authorities to ensure that public services are able to meet the enlarged population of the area.

5. Conclusions

The Alexandra Residents' Association has undertaken a simple evaluation of the overarching Planning Statement and the supporting documentation, giving a weighting of 50% to the planning statement as this covers almost all aspects of the proposed development, and 2% for each supporting submission (such as the Design & Access Statement, Heritage and Townscape and Visual Impact Assessment, Energy Statement, Planning Drawings etc.). We conclude that compliance with policy and quality of the submissions would be in the region of 44% against an ideal minimum target of 75%. The overall balance in our view is therefore strongly against the granting of planning permission, where the substantial harm far exceeds any public benefit. Please see Appendix 3 for the evaluation scoring for each element against quality and policy. We note that the Levelling Up agenda has been ignored and is not covered under this planning application. Recent policy has confirmed that provision of housing should not impact so significantly as to change or harm the character of communities. Similarly, there has been no Masterplan carried out by the planning authority, London Borough of Bromley, or through the Greater London Authority, or the developer of this site, into the Penge Regeneration Area and any provision of housings/commercial mix. The redevelopment of the Blenheim Centre is an opportunity to improve the commercial offer and support the High Street and linkages through to Maple Road and other existing residential areas, with an appropriate mix of commercial, leisure and community uses, included an element of housing (predominately affordable) and enhanced public realm and greening of the environment/setting. The redevelopment of the Blenheim Centre is welcomed but it must be proportionate to what the site and community can bear, which means in practice a proposal at a quarter of the current size and with a proper masterplan for the whole town centre. We conclude that the proposed overdevelopment of the Blenheim Centre by Hadley Property Group and their partner Clarion Housing Association fails to comply with the majority of policy requirements under NPPF, Bromley Local Plan, GLA London Plan with the harm far exceeding any claimed public benefit. We would ask that the planning application be refused.

14th February 2024

Introduction to the Revised Submission by the Alexandra Residents' Association

This document provides an overview to the resubmission of a document previously submitted by The Alexandra Residents' Association in 2023 to the previous version of the proposals made by Hadley Group which have been withdrawn and revised. For the avoidance of doubt, we are clear that the revised proposals in no way address the substantial concerns raised not just by us but across the whole community of Penge and our opposition to them remains as strong as previously. The impact on local residents from the scale of over-development, the failure to adequately address housing need through tenancies at social rent and the likely impact on the delicate ecosystem of the Penge High Street retail footprint remain substantial concerns. Our previous objections have been reviewed and although we can see changes have been made we contend that the alterations proposed (with the possible exception of fire safety) are simply window dressing and that the objections lodged previously should be considered 'live' in relation to the new proposals.

Although some grounds for objection made previously have been slightly ameliorated in the revised proposals, we contend that the substance of our objections in each area of the attached remain valid and we wish them to be considered in the forthcoming deliberations. In particular the very small reduction in scale (from 18 to 16 storeys and from 250 units to 230) and the alterations to building materials to do not adequately address the concerns detailed by the Association and many others last year.

Summary of Objections

Planning Officers and members of the council will doubtless be aware that the proposed redevelopment of the Blenheim Centre has generated massive opposition across the local community and this is reflected in the views of residents of the Alexandra Cottages. Many residents have commented as individuals but the Alexandra Residents' Association wishes to add a collective objection to the current proposals. The Association represents residents of the area off Parish Lane covering Albert Road, Edward Road, Hardings Lane, Princes Lane and Victor Road. There are just under 200 properties making up the Alexandra Cottages Conservation Area and they are a much-loved locale typifying the low rise suburban fabric of Penge threatened by the proposed development. While there are legitimate discussions that could take place about the provision of housing units in Penge (especially for affordable/social rent tenancies) and for making better use of the space covered by the proposals we wish to categorically state that this development is not an adequate answer to either issue. The association therefore adds its voice to the many hundreds of others demanding that this proposal be rejected and that plans for the site be reconsidered using the borough's Local Plan as the basis for any future proposal. While we are clear that the plan proposed would be unacceptable over development we would also urge the council to reject suggestions to implement the plans in part. The reasons why we consider them fundamentally flawed even in a reduced form are described below.

Key

Comments on Claims Made in the Planning Statement

'The optimisation of an accessible and under-utilised brownfield site located at the heart of an Area of Renewal and Regeneration'

The provision of 250 new homes

The provision of high quality .. homes meeting high design standards

A range of innovative uses to support .. the local community

The creation of a new civic public square and improved permeability in all directions;

Providing a Sustainable Car Free Scheme

Detrimental Impacts:

Heritage and Planning Detriment

Impact on Immediate Residents

Social, Economic, Community and Health Impact

Conclusions

The Alexandra Residents' Association has undertaken a simple evaluation of the overarching Planning Statement and the supporting documentation, giving a weighting of 50% to the planning statement as this covers almost all aspects of the proposed development, and 2% for each supporting submission (such as the Design & Access Statement, Heritage and Townscape and Visual Impact Assessment, Energy Statement, Planning Drawings etc.). We conclude that compliance with policy and quality of the submissions would be in the region of 44% against an ideal minimum target of 75%. The overall balance in our view is therefore strongly against the granting of planning permission, where the substantial harm far exceeds any public benefit. Please see Appendix 3 for the evaluation scoring for each element against quality and policy. We note that the Levelling Up agenda has been ignored and is not covered under this planning application. Recent policy has confirmed that provision of housing should not impact so significantly as to change or harm the character of communities. Similarly, there has been no Masterplan carried out by the planning authority, London Borough of Bromley, or through the Greater London Authority, or the developer of this site, into the Penge Regeneration Area and any provision of housings/commercial mix. The redevelopment of the Blenheim Centre is an opportunity to improve the commercial offer and support the High Street and linkages through to Maple Road and other existing residential areas, with an appropriate mix of commercial, leisure and community uses, included an element of housing (predominately affordable) and enhanced public realm and greening of the environment/setting. The redevelopment of the Blenheim Centre is welcomed but it must be proportionate to what the site

and community can bear, which means in practice a proposal at a quarter of the current size and with a proper masterplan for the whole town centre.

We conclude that the proposed overdevelopment of the Blenheim Centre by Hadley Property Group and their partner Clarion Housing Association fails to comply with the majority of policy requirements under NPPF, Bromley Local Plan, GLA London Plan with the harm far exceeding any claimed public benefit.

- West Beckenham Residents' Association – Objection (22nd February 2023)

WBRA urges LB Bromley to refuse this application for high rise development. We urge the council to continue its policy of resisting high rise development in the Borough. Eighteen storeys is far too high for this part of Bromley. Beckenham is also under pressure from applications for high rise buildings which we do not wish to see, so we support our colleagues and close neighbours in Penge in objecting to the application.

Penge Forum, Community Association for Penge and Anerley– Original objection (15/03/23), updated comments outlined regarding revised proposal.

- The Blenheim - Arpley Estate Residents' Association – Objection (5th February 2024)

“The Blenheim - Arpley Estate Residents Association objects to Hadley Property Group and Clarion Housing Association proposed redevelopment of the Blenheim Centre. We are fully aware that more homes are required in Bromley, and this area would benefit from some regeneration. However, this area already has many new housing schemes which are in keeping with the neighbourhood. This application will change the skyline and alter the character of the area.

Our objections are:

1. The adverse effect on the residential amenity of neighbours, by reason of noise disturbance, overlooking, loss of privacy. This redevelopment will have an adverse effect on the residential amenity of neighbours. We live on the Blenheim – Arpley Estate which will be overshadowed by the proposed tower blocks as we are located directly behind the Blenheim Centre. Tower blocks will completely change the character of the area and massively increase overcrowding. Not to mention loss of privacy with the height of the development and loss of natural light. A 2-storey reduction from 18 storeys to 16 storeys will not address the concerns we residents have, which are planning objections. Currently this area is peaceful, and we are concerned this development will lead to overcrowding, increase in noise as well as pollution, waste and rubbish. We all believe our health and wellbeing will be directly affected due to the change in the quality of our lives should the development proceed. Currently the area has a positive quality of character, it is peaceful, well but not overpopulated. The plans are not in keeping with the area or respects the character of the neighbourhood in anyway.

2. Unacceptably high density / over-development of the site.

The proposed development damages the open aspect of the neighbourhood - the developers will be removing our resident's ability to see the sky. The look and feel of Penge High Street will be irrevocable changed. The homes will be super dense, with people being forced into tower blocks while the rest of the neighbourhood is generally low density. Again, we are concerned how dense the area will become without due regards to the local people currently living and how this increase density will impact on health and wellbeing. The development will bring an already stretched social and physical infrastructure e.g. GPs, Schools, Waste Management, green areas, public transport, traffic and parking. The developers have made no mention of the how they will support this and how the change in infrastructure will support the local community. Our traders do require parking to keep their shops running in the high street.

3. Effect of the development on the character of the neighbourhood

By granting planning permission to the developers, this may set a precedent and the low-rise Victorian character of the area will be irrevocably changed, if not destroyed. The Bromley local plan states that a range of decent homes of different types and sizes are available and housing supply is tailored to local needs. Any new housing complement and respects the character of the neighbourhood in which it is located, paying particular attention to the density of development... (1.3.6). We do not believe this has been considered in the developers plans.

4. The proposed development is over-bearing, out-of-scale or out of character.

The current proposals in terms of appearance when compared to neighbouring properties is out of character. The CGI images where the tower blocks destroy the skyline also show how out-of-scale and out of character the tower blocks are. The development is overbearing and not appropriate for the neighbourhood. There are no high-rise tower blocks in the area.

5. Too Tall

Similarly, our objection (over-bearing, out-of-scale or out of character) this development is simply too tall. As outlined throughout my objections, the proposal for the tower blocks is too tall, out of scale and really concerns me for reasons already mentioned above relating to health and safety as well as not being in keeping with the local nature of the neighbourhood. It destroys the skyline. The building, at 16 storeys, contravenes both the Bromley Tall Buildings Policy and the London Plan Policy D9. The GLA have already themselves stated that high rise buildings should not be used as a means of addressing the housing shortage, so why should the developers be allowed to breach Bromley's Tall Buildings Policy just so they can make a profit at the expense of people's lives. Additional points from Policy D9 Tall buildings that should be considered by the council, which have not been by the developers:

- Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations. This is not a suitable location, and the development did not adequately engage with locals in a meaningful way.

- Tall buildings should only be developed in locations that are identified as suitable in Development Plans. This is not a suitable location for this development due to the height of the development - it's simply too tall and not in keeping with the Victorian low-rise nature of existing properties.

6. Loss of light / overshadowing

We are very concerned that the development will negatively impact our right to natural light, and we will be cast into perpetual darkness. We do not want a dark overshadowed high street. If the developers truly are looking to support the neighbourhood, they should reconsider their plans to create properties that meet the needs of the local community and in keeping with the look and feel of the area. Not changing the skyline forever or destroying my quality of life. People over profits always. I do not believe the plans as they currently stand would create a positive impact to the community. Instead, this development is going to create more problems which did not need to be created to begin with"

- Avington Grove Residents' Association – Objection (5th February 2024)

"The Avington Grove Residents Association would like to object to the revised planning application for the development of the Blenheim Centre on Penge High Street on the grounds that the changes made to the original proposal (to which many of our members objected) are inadequate. The reduced height will still be too imposing, causing a loss of light and introducing a tall building to the area which is out of keeping with the low rise surrounding development. Although members of the association agree that the London wide housing shortage must be addressed, they do not feel that the proposed development - right in the centre of the busy shopping area - is the the right place. The affordable options both for renting and sale have been reduced. Local schools - especially at secondary level are already oversubscribed. GP appointments are already in short supply. We also

fail to see where residents of the building would keep cars (however much you imagine people will cycle and use public transport, most people who can afford London property keep a vehicle). These are all points made in objection to the previous scheme but we would like to draw attention to the fact this new proposal has not addressed these concerns. As residents of Penge we feel lucky to live in an area which has its own character – the almshouses, Victorian terraces and other unusual buildings make it a unique neighbourhood of London. The design and appearance of this development will take away from this and leave us all the poorer.”

- Friends of Penge Recreation Ground – Objection (7th February 2024)

“1. One of the three Aims and Objectives in the constitution of Friends of Penge Recreation Ground is to 'promote the wellbeing and health of the local population through exposure to high quality green space and nature in a restorative and healing environment.' The park is an oasis of green and a welcome escape for children many of whom do not have gardens. It is not overlooked by anything high other than the spire of St Johns Church. A huge development would spoil the view from the park and lose the secluded feel to the detriment of the above aim. The low-rise skyline around the park contributes to the restorative and healing environment.

2. Wildlife. We are concerned that kestrels or sparrow hawks that sometimes visit the park from the spire of St Johns might not come anymore because of disruption and noise from building works. We also have frequent sightings of bats.

3. Housing around the development would suffer from loss of light.

4. The building works and lack of car parking spaces would have a detrimental effect on the High Street shops.

5. It would cause significant harm to the Penge's heritage assets and conservation areas, is visually jarring, and is thoroughly out of keeping with the predominantly low rise Victorian sky line.

6. Little thought has been given to local amenities eg the difficulty of getting GP appointments and school places.”

- Penge SE20 BID – Objection (9th February 2024)

The Penge SE20 BID is a not-for-profit organisation run by a volunteer Board in SE20. We represent our 260 business members, who pay a mandatory levy on their business rates which enables us to supply services over and above those supplied by Bromley council. We also lobby on behalf of our members.

The proposals by Hadley for the Blenheim Centre are a once in a generational opportunity to reinvigorate the town centre but must be sensitively handled and it is a polarising proposal. These plans are welcomed by some of our members, but also fiercely opposed by others. Some see an influx of new customers, some the decimation of the town centre by loss of parking and congestion. Our comments refer to the commercial element of the development and parking.

The existing development provides the Town centre's only shoppers' car park, for many customers of the existing centre's retail units, but also using it as parking to visit successful destination retailers in and around the High Street. Many of the surrounding streets are in controlled parking zones (CPZ's), so there is limited on street parking capacity. The current plans show 24 parking spaces for retail customers. There is no allowance for residential parking.

The BID believes that this has been arrived at because the developers have applied Public Transport Accessibility Level (PTAL) 5. Having studied local PTAL levels, only a fraction of the site is PTAL 5, with the majority being level 4, which requires higher parking levels for residential development, but more importantly, from a business perspective allows for higher levels of parking spaces per square meter of commercial space.

Whilst we recognise that 10.6.4 of the London Plan states "When calculating general parking provision within the relevant standards, the starting point for discussions should be the highest

existing or planned PTAL at the site" we would urge that consideration should be given to local circumstances (as that same paragraph also states) given the high street need that we believe our members require to ensure Penge remains a thriving economic hive.

Further the BID believes that the PTAL calculations are outdated as many train services from the Penge Stations have been cut since the pandemic.

The BID believes that the loss of parking will damage the vitality and viability of the Town centre overall and harm the interests of our members.

Penge will be competitively disadvantaged compared to competing local town centres that will still have off street car parking facilities, ie Beckenham, and Sydenham.

We gather that the developer will require that the residential owners/tenants must agree to not own vehicles, but how is this to be policed? It is inconceivable that some residents will own vehicles and will utilise the few available on street parking spaces. This also does not consider residents whose employment provides a company or trade vehicle, and these will also have to park somewhere. Brownfield development has removed parking facilities for many businesses and it has led to changes in Business practice, with British Gas, Thames Water and indeed Clarion to have their vehicles parked at their operators homes overnight.

Lambeth Planning Methodology states that all developments cause displacement. The current car park has 47 remaining spaces, so would it not be equitable and reasonable for this level to be returned so that the impact of the development is minimised?

The loss of parking will also impact our members who have staff that travel to work by car.

This application lacks the balance to enhance Penge High Street. London Plan policy SD6 section 2.6.4 states "Boroughs and others should ensure their strategies, policies and decisions encourage a broad mix of uses while protecting core retail uses to meet demand." This protection of core retail is not in evidence on this proposal.

Penge SE20 Business Improvement District (BID) recognises positive economic regeneration and the benefits that it can bring to our BID members.

The BID acknowledges that the existing centre has few merits and that elements of the redevelopment will provide community and green spaces, but this must not come at the cost of the existing business community.

- Penge Forum, Community Association for Penge and Anerley – Objection (14th February 2024)

Penge Forum objects to the proposed planning application for the Blenheim Centre, SE20. Penge Forum is the Residents' Association for those who live in or care about Penge and Anerley. The Forum is not affiliated to any political party. We currently have 174 people registered on our mailing list.

On Wednesday 8th February 2023, Penge Forum, held an open meeting at the Melvin Hall, Penge, attended by well over 100 people to discuss the plans for redeveloping the Blenheim Centre. The general tone of the meeting was overwhelmingly against the proposals. Although most people attending accepted that a redeveloped Blenheim Centre could have advantages for Penge and the High Street, the vast majority thought the proposals were inappropriate and would be harmful to the area.

On Wednesday 7 February 2024, Penge Forum's AGM noted the limited changes in the new proposal and voted that previous concerns had not been addressed and were still valid objections.

In addition, a new concern was raised in relation to the loss of retail space. Comments from Penge Forum's membership highlighted:

- The sheer, height size and massing of the proposed units is out of scale with the existing mainly Victorian High Street. The proposed development is incongruous to the existing built environment in Penge and so does not offer architectural value. Overall, the meeting was against tower blocks in Penge.
- The size and massing of the blocks will be harmful to the living conditions of those in the existing houses and flats. The development would cast a shadow over both the existing residential and commercial properties.
- Although mixed development is welcome, the large number of flats proposed will overwhelm the current community. No new services are being proposed for the new residents. No social venue has been incorporated into the proposal which would likely have been welcomed.
- Not enough affordable housing.
- The parking provision in the development is inadequate for the number of flats. The applicants have attempted to mislead the council and residents over the legal requirements in this issue. The current proposals will lead to further, unsustainable pressure on parking in adjacent residential streets.
- The loss of the multi-story car park and the retail units in the current Blenheim Centre will be harmful to the High Street and lead to a reduction in trading as shoppers move to other nearby locations with better accessibility.

- Bromley Friends of the Earth – Objection (15th February 2024)

Bromley Friends of the Earth wish to object to the above application on the grounds of overdevelopment and residential amenity issues.

1. The developers have stated that they can lower carbon emissions from their proposals by reducing the number of floors to be built, see their Whole Life Carbon report; and therefore they should do more; and reduce the number of floors further, and the council should welcome such contributions to reducing carbon emissions. The Whole Life Carbon report also discusses how recycling the existing concrete frame will help reduce carbon emissions. We therefore request that the fullest possible exploration of both of these opportunities are taken before planning permission is granted.

2. The council has an excellent Biodiversity Partnership and plan however because, and understandably, much of the work so far in Bromley on biodiversity has been about protecting more greener and rural spaces from loss, less time and effort has so far gone into how new developments can enhance more urban and degraded (in biodiversity terms) sites, such as the Blenheim Centre site. The claim that the new development will increase biodiversity value by 61% is very welcome, however it's very unclear how this will happen. No planning permission should be granted until such important details are the subject of a report provided by an urban ecologist with experience of such sites.

3. The sustainable transport hub, and the aim of supporting more walking and cycling, are welcome ambitions; however it is not at all clear if the potential of these ambitions will be realised (see para 4.69 of the Transport Assessment supporting document) and therefore no planning permission should be granted until full and firm details of the sustainable transport hub are provided.

Summary

The design of the complex is of a dominating over-powering nature and the main high rise is aesthetically unpleasing both in shape and use of materials. The effect on the infrastructure in an area where there are already high demands, would be unsustainable.

- The Gardens Trust – No Comments (15th February 2024)

Thank you for consulting the Gardens Trust in its role as Statutory Consultee on the above application which affects Crystal Palace Park an historic designed landscape of national importance

which is included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II*.

We have considered the information provided in support of the application and on the basis of this confirm we do not wish to comment on the proposals at this stage. We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

d) Adjoining Occupiers

Objections

Land use (loss of existing retail)

- object to demolishing Blenheim Shopping Centre
- reduction in ground floor shops
- disturbance of the town centre
- loss of valuable amenities such as affordable shops such as Iceland and Wilko
- current shops are popular to local residents
- goes against what Penge needs
- more commercial/ shops needed in the High Street
- loss of jobs in the local area
- local shops and businesses will be negatively impacted
- will not help with regeneration
- Penge needs a central hub with more leisure and quality retail units
- will reduce footfall to existing traders
- loss of existing parking will impact existing businesses
- application does not address lack of direct presence on the High Street
- existing businesses may not return

Design (Height, scale, massing, density)

- huge overdevelopment of the site
- out of scale
- out of character
- harm to character and appearance of area
- the development is too tall / height is not in-keeping with High Street or local area
- negative impact on surrounding areas including strategic views
- detrimental visual impact / amenity
- impact on skyline
- will be seen for miles around
- not appropriate for suburban character
- has no local context in its extreme height
- unreasonably large for a high street / area
- will dominate the local landscape
- overbearing/ overly prominent
- Penge is low rise - total opposite of visual identity
- too dense
- unacceptable to cram in this many homes into such a small space
- pandemic taught us the importance of community green spaces and neighbourhood
- not in proportion to the area and local estate
- bulky in comparison to wider street scene
- layout and density of building is not fitting for the area

- will set a precedence for further towers to be built in the area
- do not want a skyline like Lewisham/Croydon/Greenwich Peninsula
- does not comply with London Plan policy regarding tall buildings
- reconsider overall massing – development should be lower scale
- higher than anything else in the Bromley
- vertical sprawl
- 12 storey buildings (Surrey and Kent Towers) were demolished in The Groves 22 years ago – believed to be an eyesore and unsuitable for residential living
- against policy 47, 48 of BLP, D6, D9 of LP
- Travelodge (8-10 storeys) already stands out
- tower block previously refused in Parish Lane
- would not be acceptable in other parts of the borough (e.g. Beckenham High Street)

Design (appearance)

- development will have a detrimental visual impact on the local area
- out of character for the local area
- design not in keeping with street scene of High Street
- incongruous and does not contribute positively
- lacks architectural merit or visual interest
- it looks horrible / badly designed
- designs are unremarkable and unattractive
- completely soulless
- will really affect the look and feel of the high street not for the better
- will be an eyesore in an already tired looking part of the area
- would radically impact ambience of Penge
- object to colour and style
- does not use best possible materials
- bricks should match those in other buildings
- would act as a marker for Penge
- CGI imagery used
- light will be blocked from the high street

Heritage and conservation

- no respect for history heritage of Penge
- no positive contribution to local character
- will not preserve or enhance Conservation Area
- low-rise Victorian - many residential homes surrounding site are Victorian 2-3 bedroom terraces
- would tower over listed and historic buildings nearby
- historic buildings would be overshadowed
- Grade II listed building near the site (Watermen's Almshouses) – historic and of wider significance
- close to St John's Cottages and Alexandra Cottages, St John's Church, Penge War memorial etc..
- will impact views to and from Crystal Palace Park - proximity to historical site
- Penge has an incredible history with amazing architecture
- this development will rip the heart and character out of Penge
- disfigure the landscape of historical Victorian high street
- would dominate the skyline and change character
- does not align with heritage of the area
- contrary to Policy 42

- Penge is Victorian jewel
- no attempt to reflect architectural styles building will face
- block historic landmarks
- subsidence and harm to listed buildings
- objections from Victorian Society and English Heritage

Neighbouring Amenity

- loss of light (sunlight, daylight, skylight)
- right to light under law
- overlooking/loss of privacy
- loss of sense of privacy
- visual amenity
- loss of existing views
- overshadow the surrounding areas
- light pollution - additional light from building
- will restrict the sunlight on a vast area of Penge
- appears to be little assessment on the lack of natural light on neighbouring properties
- wind effects of the towers on shoppers in the high street
- significant blocking of light for Burham close, in particular houses 1-4 and 29-32
- noise and disturbance from balconies
- environmental and noise pollution (long after construction)
- impact quality of life
- daylight report shows properties would be impacted beyond the guidelines
- existing balconies would be unusable
- overshadow small playground in Burham Close
- will affect mental health of existing residents (overshadowed etc..)
- noise, disturbance and pollution during construction work

Environmental Impacts

- no details about how development will address sustainability and on-site generation
- increased pollution
- influx will affect local traffic – air quality
- plans could do much more to incorporate green space and encourage biodiversity in the area
- loss of trees (including London Plane trees)
- detrimental to wildlife
- environmental impact of destroying the existing shopping centre
- lack of real green space (LP GG3)
- green space not large enough to benefit residents and proposed buildings
- increase in concrete/man-made materials
- does not make use of low environmental impact materials
- greening will die without ownership or maintenance
- create wind tunnels
- create unnatural heat
- tall buildings affect micro-climate of local surroundings
- developer needs to provide more clarity that payments will equate to genuine carbon extraction for this project
- possibility of ground source heating?
- is the development carbon neutral?
- no mention of green/renewable initiatives

- no information in Fire Strategy about where Spent Fire Water would be directed (should be agreed by EA)
- one of few seasonal breeding areas for large number of swifts
- Biodiversity Net Gain
- existing car park could serve as home to bats and rare species (have been seen there)
- only means to be certain about the use of a building by birds and bats is by a visual inspection of the interior for evidence of bat guano
- failure to undertake an interior inspection of the warehouse to ascertain the presence or not of bat roosts is in contravention of UK legislation
- bats in the area surrounding the site
- mitigation measures being used to avoid delays and complications
- artificial habitats are inferior to established habitat
- concerned proper bat and wildlife survey has not been carried out
- stag beetles found in neighbouring site
- owls can be heard at night
- right to access clean air
- carbon and fossil fuels needed demolish
- towers not eco-friendly
- impact on Blenheim-Arpley Community Gardens
- high risk flood area
- rivers and springs directly under Blenheim centre
- increase risk of flooding
- no provision of renewable energy generation (could include solar or wind)
- dust emission magnitude large – need mitigating measures (no submission to date)
- concerns about bat boxes – environmental health issue?
- more wind generated than in low rise areas
- drainage issues

Highways and Transport

- inadequate car parking
- loss of existing parking - less parking available
- problems with parking for the high street and for residents
- straddles 2 PTAL ratings – PTAL 4 and 5
- no town centre parking would remain
- issues regarding adequacy of parking/loading/turning
- highway safety
- when the parking has been closed at the Blenheim centre it has caused real problems on the high street
- residents parking restrictions and Blenheim car park have help alleviate
- if people can't park they won't shop in Penge and businesses will close
- increase traffic
- impact on traffic in neighbouring street
- will cause significant congestion on local roads
- to believe that owners will not have cars is naïve
- difficult to enforce that people moving in won't have cars
- residents will bring cars – impact on surrounding roads
- unreasonable to think future occupiers will not need cars for their jobs
- takes no account of the existing local infrastructure
- insufficient infrastructure
- not enough parking spaces to support the influx of people

- rely on parking to access high street shops
- tower blocks of this type are not allowed in Bromley town centre even though Bromley TC has well over 20 trains per hour - Penge has much fewer
- traffic spillover into the neighbouring roads
- the lack of parking is worrying for disabled people
- loss of parking will impact on the shops- development removes only off-street parking for the High Street
- will impact role as a shopping and dining destination
- road access impact – loss of two well used roads
- trains to/from Victoria and Penge East are already full
- buses full at peak times
- existing local residents will create driveways
- no dedicated cycle lanes into central London
- delivery area to the rear already busy
- could cause discrimination – accessibility issues for shopping
- local roads may require permits – at cost to residents
- delivery drivers will start parking on the high street
- should be allowances for disabled cyclists
- transport assessment does not include vehicle tracking
- CEMP – lack of information
- does not address waste servicing plan for rear of High Street
- access for emergency vehicles
- impact on access to rear of business
- EV charging facilities only abide by minimum requirements
- safety concerns during construction works including safety of construction access
- loss of Lidl in the High Street due to lack of parking
- errors in statements regarding existing transport links
- access to waste storage / recycling seems poorly planned – no appropriate turning space for refuse vehicles
- no increased train service to London – train service from Penge West to London Bridge cancelled
- site not within an existing CPZ – number of surrounding streets are not subject to parking controls
- disabled parking provided on the road
- 2021 census showed 0.41 vehicles per household – would equate to 103 cars for 250 units
- no assessment made of impacts of additional parking demand
- car free should not be in lower PTAL areas
- access – conflicts between users
- sustainable transport hub - no details
- concern for security of cycle storage
- little to no cycle lanes within Penge or surrounding area
- E-scooters not allowed in Bromley
- at odds with ULEZ aims
- if minded to grant, following should be secured via S106:
 - Permit-free designation to prevent residents from applying for parking permits for any future CPZ
 - Contributions towards parking surveys / future monitoring of parking stress
 - Contributions towards consultation on extending nearby CPZs
 - Contributions towards implementation of CPZs
 - Car Club membership for all residents for a minimum of three years

- Contributions to secure meaningful improvements to walking and cycling within the vicinity of the site, particularly linking to existing cycle routes, public transport nodes, schools etc (as per the Active Travel Zone routes identified within the TA)
- Provision of 12 months free public transport vouchers for all new occupants (as per the Outline Residential Travel Plan Action Plan)

Affordable Housing

- low percentage of affordable housing
- will end up being 'gated communities'
- the affordable homes will not be truly affordable
- small percentage affordable for everyday person seems to be no proposed provision of homes for rent at 'social' rent levels
- local people want local affordable houses, not flats, family homes that are truly affordable (as "affordable housing" is often not that affordable)
- concerns over the management of affordable units
- split of private and affordable not adequate
- must provide for existing residents
- not clear from the plan how many of the homes will be social housing
- need for social housing in Bromley
- affordability of the new residences will mean it is highly unlikely to benefit the existing local community

Quality of residential accommodation

- low quality housing
- most of units will not be suitable for families
- high rise flats are not suitable for families, and families forced to live in such housing are disadvantaged as a result
- will affect mental health of new occupiers
- need access to outdoor garden space
- quality of resulting accommodation – sizes, single aspect, ventilation etc.
- quality of the proposed accommodation
- no laundry facilities in the flats could result in mould
- some layouts would fail to provide a high standard of design or safety of the occupants
- the proposed flats/ maisonettes at the lower levels have very deep plans with just one façade with clear glazing proposed
- inadequate levels of daylight for the rooms proposed
- some maisonettes don't provide a habitable room or enough space at the entrance level for adaptability to a bedroom
- poor space layouts
- bedrooms too small, bedrooms with awkward configurations and too many windows
- some flats fail to provide a protect escape route out of the flat as to escape from the bedrooms the occupant will have to go through the open living / kitchen area
- fails to comply with requirement of 2 staircases for all new buildings above 30m
- density of home – not good quality for people who will live there
- concerned about the welfare of future tower block residents especially families
- easy access to outside space is vital for well-being and mental health
- soundproofing of flats for new residents
- no private outdoor space
- intimidating and unattractive places with significant social, economic and housing problems
- residents would not have their own outside area to grow vegetables plants
- no outside area for children to play in

- disabled access

Fire Safety

- concerns about fire safety (fire escapes)
- difficulties that the fire service would have in controlling situations
- unable to locate a sprinkler tank on any of the relevant drawings
- requirement for a wet rising fire main in block C
- complexity of tenures within the proposed development the appropriate level of (fire) maintenance may be difficult to achieve across the site
- inaccuracies undermine validity of Fire Report
- two internal first escape routes needed in high rise buildings over 30m
- changes to fire escapes are an after thought

Infrastructure and Services

- extra pressure on doctors, dentists, local schools, childcare for under 5s, local hospitals
- lack of community facilities
- people are already being pushed out to secondary schools in other boroughs
primaries are oversubscribed
- crime already high – will be made worse without extra funding for police, youth centres and education
- refuse from 250 dwellings add more strain to local services
- rubbish collection in Penge is already awful with rats in many areas
- development will massively exacerbate the problem
- pressure on local resources
- impact on services such as water supply and waste water
- how will CIL and the S106 capital be spent?
- lack of utilities assessment
- CIL – no guarantee that money will be spent on Penge infrastructure

General

- lack of consultation / community engagement by developer
- lack of consultation is a real concern / notification from Bromley Council
- information about proposed height not made clear by developer during consultation (website or leaflets)
- site notices hard to see
- Penge already has highest population density in borough
- voices of local residents should be heard
- tall buildings are not the answer for London's housing need
- Penge has local community feel
- powerful community spirit including the Art trail, Penge festival and Penge Heritage trail
- at odds with Bromley Local Plan
- Greater London Assemble found that "(the) Committee does not believe that tall buildings are the answer to London's housing needs"
-
- increase crime in an already deprived area
- attract anti-social behaviour
- no mention of increased security or policing the developed areas
- seems to be purely a profit exercise for the developers - are unlikely to be living in the area

- developers will have little long-term interest in the development's success after the sale of its units
- will not benefit the area
- will detract people moving to Penge
- Penge is a close community with a fantastic balance of culture and backgrounds
- this development would destabilise that balance
- detrimental to a sense of local community to have so many people suddenly in one place
- should start with updating the existing housing stock
- Blenheim Centre should be refurbished and improved
- impact on emergency services
- all the data shows high rises are problematic for their residents, causing associated mental, physical and societal problems
- any plans should consider Empire Square as a whole, including Colman House, as part of a holistic approach
- 'micro park' is clever marketing but inappropriate - too small and dangerous next to busy road
- pocket parks and outdoor areas will attract anti-social behaviour
- High street will become overcrowded
- Penge has village feel in London
- maintenance of buildings
- minimal community space
- disabled person's access
- will harm local businesses
- social impact
- tower blocks linked with social deprivation
- will set precedent for future developments
- concerns about subsidence for local properties
- would not meet the aims of the Penge Town Centre Renewal Plan
- Penge is already underfunded
- overcrowding known to trigger higher death rates and suicide rates
- damage from pile driving foundations and construction vehicles on older properties
- would remove Rooftop Gallery
- should investigate how proposed housing could be met in another way/place
- other brownfield sites could be used
- look at Rokewood Apartments in Beckenham as a sensible development
- informal surveys undertaken on the High Street (by residents)
- no Equalities Impact Assessment has been submitted
- will there be provision of public toilets for visitors to the area?

Miscellaneous

- devalue local properties
- concerns about the housing association, Clarion, as a landlord and in terms of long-term maintenance and update
- council should also look at the empty shops we currently have on Penge High Street, work with the Traders and Penge BID team to improve High Street
- inconsistencies within the planning statement
- sinkhole is Penge High Street in 2013 – Thames Water could not explain
- problems with subsidence
- damage to nearby buildings due to works and foundations
- no evidence of proper plans for piling foundations

- lack of technical information about this area – no groundwater monitoring and contaminated land assessment, piling methodology and risk assessment or ground conditions assessment
- Settlement Surveys will be required
- tenures and leaseholds – questions about how the site was acquired
- very bad past experiences living in a tall tower block
- speaking at committee limited to 1 person for 3 mins – inadequate
- only given 3 weeks to respond
- online portal – some documents did not open
- problems with using the Portal to comment
- will the block interfere with Crystal Palace tower signal?
- how will block impede flight paths?
- impact on TV and radio reception
- no information displayed within the shopping centre
- residents expected to review 100s of documents to make comments
- many of the support letters are the same (cut and paste), developer has gone door to door for support

Summary of Petition (Hosted by Penge Preservation Society, 2314 signatures)

- detrimental effect on the character area
- visual impact
- insufficient infrastructure for increase population (e.g. doctors, schools, greenspaces, parking,)
- out of keeping with area
- would destroy village atmosphere
- impact on residential amenity of neighbours
- noise, disturbance, overlooking, loss of privacy, loss of light, overshadowing
- overdevelopment
- high density
- over-bearing and out of scale
- loss of views
- will not provide genuinely affordable housing (need housing people can afford)
- deprives local people of local resources
- too high
- will not be able to shop locally
- disruption during construction
- not learn from previous high-rise buildings
- will not improve Penge
- loss of shops
- increase crime
- area already has heavy traffic
- make area congested and ugly
- overcrowding
- should start with community's needs (not profit)

Support

- love the look of the development
- style is modern and fresh
- beautiful development
- provides much need investment in the area
- provides much needed housing
- new jobs

- new residents will boost high street (increase footfall)
- pleased to see 'no car' development
- consultation process has been clear – community has been involved
- Penge is well connected
- should not be encouraging people to drive short distances
- existing residents should consider the benefits to the whole community in terms of reduced local traffic and air pollution
- whole area is lacking in new housing
- shopping centre is an eyesore (and immediate surroundings)
- proposed commercial units next to pedestrian spaces look good
- massing seems OK
- new pedestrian routes through the site are positive
- Penge needs change – cannot survive as it is
- Blenheim centre is old and tired – eyesore, no architectural merit
- existing car park is normally empty
- massively needed opportunity for regeneration
- will attract new businesses and residents to the area
- NPPF states that planning decisions should "allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene"
- fantastic plans, responsible and progressive
- will be an asset to the area
- will replace a dated building which is hardly used and create much needed energy efficient housing
- generally approve of the plans with one exception - an 18 floor building is too high to keep the character of the area
- would like to see opportunity for a cinema rather than gym
- more likely to visit, live, work in Penge
- will lead to further gentrification
- will put Penge on the map
- area suffers from lack of affordable housing
- good provision of cycle storage
- green public spaces
- good transport links
- Penge has a community feel that is not reflected in the high street
- will bring more young people to the area
- improve health and wellbeing of Penge
- will link Maple Road with the High Street
- hope to see higher quality / variety of eating and drinking establishments
- in-line with NPPF, LP and BLP policies
- sustainability benefits
- S106 to secure infrastructure improvements
- adding density to suitable location
- will support viability of local area
- Blenheim centre is currently not safe at night
- get rid of chain stores that provide little to the economy
- overflow towards surgeries and dentists will be worked out
- car park is dangerous and rarely full
- listed buildings not threatened or adjacent to development
- private garden overlooked part of urban living
- will create 2,600 sqm new commercial floorspace including new Iceland

- new public route connects High Street and Burnham Road, creating new civic square
- creation of pocket park – quiet green space
- 250 new homes – 35% affordable will help release pressure on housing in surrounding area
- 100 trees planted on site
- Helping to achieve biodiversity net gain of 65% in excess of GLA target (10%)

Further consultation letters were sent to residents on 12th January 2024 seeking views on the revised proposal. The points raised in the responses received are summarised as follows:

Objections

- insufficient notification – confusion about consultation period
- lack of site notices
- consultation period too short
- concerns that previous objections will not be taken into account
- revisions to not make a material difference – objections remain
- do not address issues with original application
- previous objections repeated
- inadequate response to local criticism
- lack of consultation by Hadley and Clarion Housing
- barely adjusted the scheme – plans have not changed much
- reduction in height minimal
- 18 storeys was too high and 16 is no better
- change to brick colour not enough
- excessive bulk
- overall design, scale, appearance and material still not acceptable
- Penge not central London
- out of character – not in-keeping with local area
- out of context with Penge's architecture/ heritage / conservation area / listed buildings
- too high
- out of character with surrounding area
- proximity to heritage sites/conservation area
- overdevelopment
- overbearing
- overcrowding
- loss of light (neighbouring buildings)
- Impact on sunlight/ daylight to surrounding area/properties
- loss of privacy and overlooking
- overshadowing
- poor architectural design
- too dense
- lack of parking
- loss of parking
- travel plan out of date
- additional traffic on local roads
- environmental damage/ disruption during construction
- no renewable energy provision onsite
- Penge already overcrowded
- basic infrastructure not in place for increase in dwellings
- GPs / school, oversubscribed
- insufficient landscaping to offset carbon generation

- loss of visual amenities – visual impact
- loss of existing views / skyline
- impact on businesses
- existing shops displaced and may not return
- loss of affordable shops
- loss of jobs
- change to access arrangements for existing retailers
- will not regenerate High Street
- impact on community
- reduction in train/ transport services
- noise and disturbance from new residents
- waste management
- set precedent for high rise development
- drainage issues
- remains contrary BLP policies
- retail floorspace inadequate – reduction in available retail space
- pocket park inadequate – lack of open space
- inadequate affordable housing / units will be unaffordable
- could cause subsidence and damage to surrounding buildings
- road safety concerns
- may result in increased crime
- outdated transport assessment
- not opposed to the redevelopment on Blenheim but objections to this proposal
- low quality housing
- no increase in dual aspect provision
- no reduction in internal kitchens
- no significant change to access routes to bike stores
- flats too small to make lasting homes
- concerns about wind
- cash payment to offset environmental concerns contradicts BLP
- inappropriate location for development
- harmful to residents
- harmful to wildlife
- loss of trees
- confirmed presence of bats
- Empire and Arpley Square should remain public space
- loss of artwork
- insufficient attention to hydrological conditions – survey of ground water condition should be carried out before permission granted
- fire safety including access for fire and rescue service vehicles
- shouldn't approve this plan on the need to meet housing targets
- should prioritise transparency and accountability
- concerns regarding access points

Support

- current building is an eyesore
- much needed development into the area
- huge boost for local businesses
- investment into the area
- economic benefits

- increase property values
- similar buildings in vicinity (Sydenham and towards Anerley)
- well connected to public transport
- appropriate density
- old building replaced with safe modern home
- not many cars use the existing car park
- in need of refurbishment
- much needed housing
- tall buildings bring necessary density
- will not affect Penge's cultural heritage
- important that the development is sustainable and run environmentally/ ethical way
- affordable housing provided
- social/ affordable housing should be fairly distributed through development
- Almshouses are sufficient distance away
- housing that is argued will be overshadowed is to the south
- face east-west so will not have sunlight/views obstructed
- good to see car free development – close to railway stations
- Victorian history and modernity can coexist and flourish
- New homes for Penge (35% affordable)
- New play space and landscaping
- sustainable development - improved bio-diversity, solar panels and sustainable transport hub
- improved public realm, community and commercial uses

Neutral

- need more homes
- not opposed to new modern building
- developers should be held accountable and build to high standards

Full copies of all the representations are available to view on the electronic file (ref.23/00178/FULL1).

- e) Officers' response to objections raised on the grounds of planning process, such as insufficient notification, confusion about consultation period, lack of site notices and consultation period being too short:
- Local planning authorities are required to undertake a formal period of public consultation, prior to deciding a planning application. This is prescribed in [article 15 of the Development Management Procedure Order](#) (as amended), which requires a statutory consultation period to last for at least 21 days.
 - Local planning authorities have discretion about how they inform communities and other interested parties about planning applications, however [Article 15 of the Development Management Procedure Order](#) sets out minimum statutory requirements for applications for planning permission.
 - Where an application has been amended, although there is no legal requirement to do so, the Council endeavours to re-notify if the amendments would materially affect the considered views of interested parties. It is up to the Council to decide whether further publicity and consultation is necessary in the interests of fairness.
 - Generally, a shorter period of 14 days is allowed for re-consultation on amended applications (in line with Paragraph 4.4.9 of the Council's Statement of Community Involvement (SCI), prepared under [section 18 of the Planning and Compulsory Purchase Act 2004](#)).
 - The amended planning application was re-publicised through all the original consultation methods, including site notices (5 No.), neighbour notification letters, newspaper advert and

publication on Planning Public Access on the Council's website; each allowing a period of full 21 days from the commencement of each individual consultation procedures.

- Different ways of consulting local residents often result in different expiry dates of the said 21-day period, most frequently due to the press advert cut off dates.
- As no resolution on the planning application can be legally made before the formal consultation period is completed, the latest consultation expiry date is taken as the overall expiry of the consultation exercise. This in practice often results in a slightly extended consultation period lasting longer than 21 days.
- Whilst it is appreciated that various dates stated on the website may appear confusing, each form of publicity does clearly specify a deadline for responses, therefore no responses made within the timescales given, regardless of which form of notification they respond to, should be affected by these differing dates or result in local residents missing the deadline given.
- All comments received until the end of overall consultation period are guaranteed to be taken into consideration in the assessment of the proposal and addressed in officer's report. However, the Council will take into account any representations received up to the date on which the decision is made.
- All representations made need to be taken forward and taken into consideration in the final assessment of the proposal and are summarised above.

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 conflict 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 strongly indicate otherwise.

National Policy Framework (NPPF) 2023

- 5.3 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)

- 5.4 Relevant paragraphs are referred to in the main assessment.

The London Plan (March 2021)

- 5.5 The relevant policies are:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- SD6 Town Centres and high streets
- SD7 Town centres: development principles and Development Plan Documents
- SD10 Strategic and local regeneration
- D1 London's form, character and capacity for growth
- D2 Delivering good design
- D3 Optimising site capacity through the design-led approach

D4 Delivering good design
D5 Inclusive design
D6 Housing quality and standards
D7 Accessible housing
D8 Public realm
D9 Tall buildings
D11 Safety, securing and resilience to emergency
D12 Fire safety
D13 Agent of Change
D14 Noise
H1 Increasing housing supply
H4 Delivery affordable housing
H5 Threshold approach to applications
H6 Affordable housing tenure
H7 Monitoring of affordable housing
H10 Housing size mix
S4 Play and informal recreation
E9 Retail, markets and hot food takeaway
HC1 Heritage conservation and growth
HC3 Strategic and Local Views
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
SI1 Improving Air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 8 Waste capacity and net waste self-sufficiency
SI 13 Sustainable drainage
T2 Healthy Streets
T3 Transport capacity, connectivity and safeguarding
T4 Accessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.1 Residential parking
T6.3 Retail parking
T6.5 Non-residential disabled persons parking
T7 Deliveries, servicing and construction
DF1 Delivery of the plan and planning obligations
M1 Monitoring

Mayor Supplementary Guidance

5.6 London Plan Supplementary Guidance

- Accessible London: Achieving an Inclusive Environment (2014)
- Air Quality Neutral LPG (2023)
- Air Quality Positive LPG (2023)
- Be Seen energy monitoring LPG (2021)
- Cargo bike action plan (2023)
- Circular Economy Statements LPG (2022)
- Green Infrastructure and Open Environments: The All London Green Grid SPG (2021)
- Homes for Londoners - Affordable Housing and Viability (2017)
- Housing Design Standards LPG (2023)
- Housing SPG (2016)
- Energy Assessment Guidance (2022)

- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Providing for Children and Young People's Play and Informal Recreation (2012)
- Shaping Neighbourhoods: Character and Context (2014)
- Social Infrastructure SPG (2015)
- Sustainable Transport, Walking and Cycling London Plan Guidance (2021)
- The Control of Dust and Emissions during Construction and Demolition (July 2014)
- Threshold approach to affordable housing on public land (2018)
- Urban Greening Factor LPG (2023)
- Whole Life Carbon LPG (2022)
- Draft Affordable Housing LPG (2023)
- Draft Development Viability LPG (2023)
- Draft Digital Connectivity Infrastructure LPG (2023)
- Draft Fire Safety LPG (2022)

Bromley Local Plan (January 2019)

5.7 Relevant policies are:

- 1 Housing Supply
- 2 Affordable Housing
- 4 Housing Design
- 13 Renewal Areas
- 15 Crystal Palace, Penge and Anerley Renewal Area
- 30 Parking
- 32 Road Safety
- 33 Access for all
- 37 General Design of Development
- 38 Statutory Listed Buildings
- 39 Locally Listed Buildings
- 42 Development Adjacent to a Conservation Area
- 47 Tall and Large Buildings
- 48 Skyline
- 77 Landscape Quality and Character
- 79 Biodiversity and Access to Nature
- 80 Strategic Economic Growth
- 94 District Centres
- 113 Waste Management in New Development
- 116 Sustainable Urban Drainage Systems
- 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

5.8 Relevant Guidance are:

- Affordable Housing (2008) and subsequent addendums
- Planning Obligations (2022)
- Urban Design Guide (2023)

6. Assessment

6.1 Principle of development/Land Use Considerations

Town Centre Regeneration/Renewal Area

- 6.1.1 The site is located within Penge District Town Centre and is identified as a Strategic Area for Regeneration in the London Plan and within the Crystal Palace, Penge and Anerley Renewal Area in the Bromley Local Plan.
- 6.1.2 London Plan Policies SD6 and SD7 of the London Plan support the vitality and viability of London's town centres and encourage mixed-use developments and intensification. Policy SD8 Town centre network sets out in clause E that district centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.
- 6.1.3 Policy SD10 of the London Plan 'Strategic and local regeneration' supports boroughs in identifying strategic areas for regeneration in Local Plans and develop policies that are based on a thorough understanding of the demographics of communities and their needs and consider local circumstances.
- 6.1.4 London Plan Policy SD10 also specifies that development proposals should contribute to regeneration by tackling inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.
- 6.1.5 Local Plan Policy 13 states that the Council will seek to maximise opportunities for enhancement and improvement within the Renewal Areas. Proposals should provide demonstrable economic, social and environmental benefits and address identified issues and opportunities. Local Plan Policy 15 of the Local Plan states that proposals within the Crystal Palace, Penge and Anerley Renewal Area will be expected to take advantage of opportunities:
- a - to maximise contributions to, and benefits from the thriving cultural and leisure economy, which has evolved in the Crystal Palace District Centre and, in the Crystal Palace Strategic Outer London Development Centre;
 - b - which create benefit to the wider area by contributing to the conservation and enhancement of Crystal Palace Park through development that respects its character area and ensures a positive relationship with natural and heritage assets;
 - c - to support renewal in Penge Town Centre.
- 6.1.6 The redevelopment of an accessible, brownfield site within the Penge and Anerley Renewal Area / London Plan Strategic Area of Regeneration is supported. The proposal would, in principle, contribute to mixed-use regeneration of this part of Penge District Town Centre. The activation of the public realm at ground floor represents opportunities to create an open space with potential civic uses to benefit both future residents and a wider community. Consideration of detailed impacts of the proposal would provide an overall view on the benefits (or not) for Penge.

Non-residential uses

Retail

- 6.1.7 The Blenheim Shopping Centre is located within Penge District Town Centre. The Blenheim Centre itself is designated as primary shopping frontage in the Local Plan. As such, Policies SD6 and SD7 of the London Plan and Local Plan Policy 94 are relevant.
- 6.1.8 Policies SD6 and SD7 of the London Plan support the vitality and viability of London's town centres and encourage mixed-use residential development and intensification.
- 6.1.9 Policy 94 states that within the primary frontages of District Centres the Council will consider a change of use away from Class A1 where the proposal would:
- a - not harm the predominant retail character of the shopping frontage,
 - b - generate significant pedestrian visits during shopping hours,
 - c - complement the existing shopping function of the centre,
 - d - not create an inappropriate over concentration of similar uses which would be harmful to the function or viability of the centre, and
 - e - not result in adverse effects caused by crime, disorder or anti-social behaviour and have no adverse impact on residential amenity.
- 6.1.10 Use Class E of the Town and Country Planning [Use Classes Order 1987](#) (as amended) was introduced on 1st September 2020 and covers the former use classes of [A1](#) (shops), [A2](#) (financial and professional), [A3](#) (restaurants and cafes) as well as parts of [D1](#) (non-residential institutions) and [D2](#) (assembly and leisure) and puts them all into one new use class¹.
- 6.1.11 The proposed development would re-provide 2,714sqm of flexible commercial floor space (Class E), therefore resulting in a loss of 1,702sqm of commercial floor space in a district town centre. It needs to be stressed however, that as only 843sqm of food retail floor space (Iceland supermarket) is to be delivered as part of the proposal (see Table 1 below), the scheme would lead to a significant reduction in actual retail floor area (-1,871sqm).

¹ Use Class E – Commercial, Business and Service –

Use, or part use, for all or any of the following purposes—

- a) for the display or retail sale of goods, other than hot food, principally to visiting members of the public,
- b) for the sale of food and drink principally to visiting members of the public where consumption of that food and drink is mostly undertaken on the premises,
- c) for the provision of the following kinds of services principally to visiting members of the public—
 - (i) financial services,
 - (ii) professional services (other than health or medical services), or
 - (iii) any other services which it is appropriate to provide in a commercial, business or service locality,
- d) for indoor sport, recreation or fitness, not involving motorised vehicles or firearms, principally to visiting members of the public,
- e) for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner,
- f) for a creche, day nursery or day centre, not including a residential use, principally to visiting members of the public,
- g) for—
 - (i) an office to carry out any operational or administrative functions,
 - (ii) the research and development of products or processes, or
 - (iii) any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

Building	Commercial Use	Floorspace [sqm]
A	Sustainable Transport Hub	136
B/C	Workspace (FF – Arpley Mews) Food and Beverage (GF and FF – Blenheim Square)	208 551 Total = 759
D/E	Food Retail (GF) Gym/Leisure (FF)	843 916 Bike store/Refuse store – 60
F	None	n/a
Total		2,714 (including bins/bikes)

Table 1 Proposed Non-residential Floorspace.

6.1.12 Alongside the re-provision of Iceland supermarket in Block D/E, the proposed commercial strategy for the site includes the provision of the following (Table 1):

- Approximately 136m² of commercial floorspace in Block A identified as the Sustainable Transport Hub offering internal cycle storage for residents and visitors, as well as bike repair workshops and bike repair facilities, e-cargo bike rentals, bike sharing, hire and leasing, bike parking stands;
- Approximately 760m² of commercial floorspace across levels 00 and 01 in Block BC, envisaged as Food and Beverage (F&B) use, with a potential allocation of level 01 to a separate workshop or flexible working area;
- Approximately 916m² of commercial floorspace at level 01 of Block D/E immediately above the proposed location for Iceland. The large floorplate provides a level of flexibility that means a series of uses could successfully operate from this space, such as adult learning or a leisure use (such as a gym).

6.1.13 The applicant has stated that whilst there is a reduction in overall floor space, this is due to the existing shopping centre containing a significant amount of non-publicly accessible storage and back of house functions. Table 2 outlines the existing commercial uses and confirms that out of 4,416sqm, only 2,678sqm is currently useable retail floorspace.

Unit	Use Class	Retail Floorspace [sqm]	Back of House [sqm]	Total [sqm]
Iceland	Class E	559	493	1,052
Wilkos (closed)	Class E	1,457	874	2,331
Peacocks	Class E	580	201	782
Card Factory	Class E	63	24	87
Key cutters	Class E	19	n/a	19
Other (Plant/Warehousing)	n/a	n/a	146	146
Total	-	2,678	1,738	4,416

Table 2.2 Summary of Existing Uses.

6.1.14 It is being argued that as the existing useable retail areas of the centre which people experience equates to approximately 2,680sqm, and the proposed areas of flexible commercial floor space (Class E) t 2,714sqm, this reflects a comparable re-provision of floorspace.

- 6.1.15 A Marketing Report prepared by Kalmars included with the application states that the existing retail units are all inward facing with no direct presence on the High Street, other than a small key cutting kiosk that faces Empire Square. The primary access route is currently from Empire Square to the north-east of the site and Evelina Road to the south, however the site is lacking in terms of active frontage, signage and any destination type benefits such as public realm. The immediate surrounding area of the site largely comprises parking and poorly coordinated servicing areas. The report demonstrates that there is demand in this location for quasi retail including dry cleaners, barbers and nail bars, generally being those businesses that cannot be done on the internet, as well as food and beverage use. Generally, these uses can be carried out under Class E.
- 6.1.16 The new development, although still set back, would have a greater presence when seen from the High Street. The primary commercial units in Blocks B/C and D/E would front onto a new public square that would form an improved and highly permeable route into the development enhancing footfall to the commercial units, whilst also providing a new destination space. The use of street art as visual cues would provide new signage opportunities, something the existing site lacks.
- 6.1.17 The applicant argues that redevelopment of the site would improve the efficiency and quality of the commercial space provided on site, designed in consultation with future tenants to meet the requirements of modern store layouts.
- 6.1.18 Officers acknowledge the argument that modern retail practices no longer require significant areas of storage, meaning that even the reduction of the back of house and storage areas supporting the commercial uses might not affect the vitality and vibrancy of the centre.
- 6.1.19 Further to that, officers accept that the existing retail units now fall within Use Class E, which was introduced by the Government in August 2022 in order to facilitate a wider range of uses in town centres to allow High Streets to adapt to changes and challenges. None of the units are subject to any restrictive conditions limiting use and notwithstanding the intent of Policy 94, the existing shops within the Blenheim Centre could change to other uses within Class E without planning permission. This effectively reduces the weight that can be given to Policy 94 as a tool to manage changes from retail (former Class A1) uses.
- 6.1.20 In the light of the above considerations, notwithstanding the reduction of the retail floorspace, officers are satisfied that the proposal would fulfil the overall land use policy aims of ensuring that the vitality and vibrancy of the district centre is not harmed. Should the application be considered acceptable, the proposed Class E floor area should be conditioned to retain the amount of floor area, as proposed, for the display or retail sale of goods, other than hot food, principally to visiting members of the public.

Residential Use

- 6.1.21 London Plan Policy H1 sets 10-year housing targets for each borough including a target of 7,740 for Bromley. 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. Policy D3 of the London Plan requires all development to make the best use of land by following a design led approach. Policy H1 of the London Plan supports the delivery of new housing on sites within town centres and close to stations.
- 6.1.22 Alongside the requirements relating to the location of the application site within a District Town Centre, the principle of residential accommodation at the application site may be

considered acceptable as part of a mixed-use scheme. Further consideration as to the type, quality and design of the proposed accommodation will be made within the remainder of the report.

Housing Supply

- 6.1.23 The current published five year housing land supply (covering the period 2021/22 to 2025/26) is 3,245 units or 3.99 years supply. This position was agreed at Development Control Committee in November 2021 and acknowledged as a significant undersupply. Subsequent to this, an appeal decision from August 2023 (appeal ref: APP/G5180/W/23/3315293) concluded that the Council had a supply of 3,235 units or 3.38 years; this figure assumes the new London Plan target of 774 units per annum applies from FY 2019/20 and factors in shortfall in delivery against past targets since 2019.
- 6.1.24 The Housing Delivery Test 2022 results (published in December 2023) indicate that housing delivery against Bromley's housing requirement has fallen below 85% over the HDT period; this requires the addition of a 20% buffer to the Council's housing requirement over the FYHLS period (in accordance with Footnote 8 of the NPPF). Applying this buffer to the appeal derived figure noted above gives a supply of 2.96 years. The Council acknowledges this amended appeal derived figure for the purposes of determining this application and considers this to be a very significant level of undersupply.
- 6.1.25 The Council is in the process of preparing an updated FYHLS position, reflecting changes since the last published position in November 2021.
- 6.1.26 The NPPF (2023) sets out in paragraph 11 a presumption in favour of sustainable development. In terms of decision-making, the document states that where a development accords with an up to date local plan, applications should be approved without delay. Where a plan is out of date, permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 6.1.27 Having regard to footnote 8 of the NPPF, the policies which are most important for determining this application, including Policy 1 of the Bromley Local Plan, are out-of-date and consequently the presumption in favour of sustainable development as set out in Paragraph 11(d) is engaged.
- 6.1.28 This proposal would provide 230 new dwellings representing a significant contribution to the supply of housing within the Borough. This would 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.

Affordable Housing

- 6.1.29 The London Plan requires affordable housing on sites of 10 units or more. London Plan Policy H4 Delivering Affordable Housing sets out specific measures to aim to deliver the strategic target of 50% of all homes in London being affordable. This includes using grant to increase affordable housing delivery beyond the level that would otherwise be provided.
- 6.1.30 London Plan Policy H5 Threshold approach to applications, allows applications which provide affordable housing at or above a relevant threshold level, which is set at a minimum of 35% for schemes which are not on public sector land or 50% per cent for public sector land where

there is no portfolio agreement with the Mayor, and which meet the remaining criteria in part C of the policy, to follow a fast-track route.

6.1.31 Part C of Policy H5 states to follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
- 2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
- 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
- 4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.

6.1.32 Part F of Policy H5 states that applications which do not meet the above criteria are required to submit detailed supporting viability evidence.

6.1.33 Policy H6 'Affordable Housing Tenure' of the London Plan specifies that the following split should be applied to residential developments: 30% for social/affordable rent; 30% for London Living Rent/London Shared Ownership; with the remaining 40% to be decided by the borough as either low cost rent (social/affordable) or intermediate units. The Local Plan requires a 60:40 (social-rented/affordable rented: intermediate) split which is consistent with Policy H6, unless it can be demonstrated that a lower level should be sought or that the 60:40 split would not create mixed and balanced communities.

6.1.34 The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report, including a range of income thresholds. Affordability thresholds must be secured in the section 106 agreement attached to any permission, as well as the relevant and applicable review mechanisms.

6.1.35 Based on Table 3 below, there would be 35.3% habitable rooms proposed for affordable housing with a tenure split of 60% Social Rent and 40% Shared Ownership. The proposal accords with Policy H6 of the London Plan and Policy 2 of the Local Plan if the proposed affordable housing provision is based on a threshold applicable to private land.

	Number of units	Number of habitable rooms
Private Sale		
1 bedroom	73	146
2 bedroom	84	252 (398 in total)
Shared Ownership		
1 bedroom	25	50
2 bedroom	12	36 (86 in total)
Social Rent		
1 bedroom	3	6
2 bedroom	20	60
3 bedroom	13	65 (131 in total)
TOTAL	230	615

Table 2.3 Mix of habitable rooms and units proposed.

6.1.36 As set up in paragraph 1.11 of this report, the Council sold its Freehold in the centre to the long leaseholder, who subsequently sold the freehold and leasehold to the applicant. Whilst the land bought by the applicant was in private ownership, the Mayor's Affordable Housing SPG 2017 states at para 2.36 that the public land threshold of 50% does apply to land that

has been released from public ownership and on which housing development is proposed. The Mayor's guidance does not give an indication as to when this restriction falls away.

- 6.1.37 The GLA Practice Note (July 2018) 'Threshold approach to affordable housing on public land' advises that where the public sector land interest is in the form of a freehold or similar interest and a long leasehold is in place which is not held by the public landowner, the 35% threshold would apply in relation to the Fast Track Route.
- 6.1.38 Further to that, officers also note that a small proportion of the application site remains in Council's ownership and could trigger the 50% threshold on these parts of the site. The GLA Practice Note mentioned above sets out the approach where part of a site comprises public land. In those circumstances the overall threshold of the site as a whole should be taken as a combination of both thresholds (i.e 35% and 50%), calculated according to a formula given. However, the practice note advises that *"where only a small proportion of a site is public land and this does not contain a functional building or land use, the 35 per cent threshold should apply for the whole site"* (Paragraph 24).
- 6.1.39 The applicants have set out in the relevant supporting information that the area in question which is located behind Colman House and is currently used for car parking and servicing measures approximately 222sqm equating to only 2.17% of the overall site area. The proposal does not comprise a functional building or any substantive works in this area other than resurfacing and new paving to tie into the works on Empire Square. On this basis, officers agree that the 35% threshold should apply, however, the proposal needs to address all other relevant criteria in Policy H5 to allow the application to be determined under the Fast Track Route, including the grant and additionality clause.
- 6.1.40 The Planning Statement advises that Latimer Developments, the development arm of Clarion Housing Group, are one of the Joint Venture applicants and have been closely involved in the development of the scheme. It also advises that Latimer would seek to utilise grant funding where possible. The applicant submitted further supporting email on 21st February confirming that Clarion has sought grant funding from the GLA's investment team and that while the applicant has actively sought the confirmation of the grant, as required by Policy H5 C (4), at the time of writing it has not been confirmed by the GLA's investment team whether any grant funding would be available for the scheme. The applicant further explained in the email dated 23rd February 2024 as follows:

"Under the new AHP programme (which post-dates the London Plan) the GLA are averse to formally committing to providing grant until the contractual position between Clarion and Hadley is legally completed which in turn cannot happen until after the legal grant of planning consent has been issued. This is not uncommon situation. In fact, we are not aware of any schemes which have been awarded grant prior to planning consent being issued under the new AHP programme. The proposed mechanism resolves this by requiring the JV to apply for grant post consent and then to use any subsidy provided on terms on which it is awarded. If the GLA do provide Clarion grant funding in line with the recent Accelerated Funding Route guidance, this will be required to be delivered by the JV within agreed timeframes and secured for use as affordable housing by a legal agreement entered into by Clarion and the GLA (referred to as a 'grant agreement')."

On this basis, officers accept that the 35% threshold should apply to the proposal and the Fast Track route is applicable.

Dwelling Mix

- 6.1.41 Policy H10 of the London Plan states that schemes should generally consist of a range of unit sizes and regard should be had to local evidence of need. The highest level of need across tenures within the Borough up to 2031 is for one bedroom units (53%) followed by 2

bedroom (21%) and 3 bedroom (20%) units. Larger development proposals (i.e. of 5+ units) should provide for a mix of units sizes and considered on a case by case basis. Bromley's Housing Register (December 2019) shows affordable need (social/affordable rented) for 3 beds.

6.1.42 In response to officers' comments, the unit mix has been amended to achieve a 60:40 affordable housing split for habitable rooms. A number of the 2 bed 4 person units have been converted to 2 bed 3 person homes and the tenure of the town houses (Block F) has changed from Private Sale to Social Rent and Shared Ownership (Intermediate Sale) to better reflect the policy requirements. The updated unit mix is summarised in Table 2.4 below.

	STUDIO	1-BED	2-BED	3-BED	TOTAL
Social Rent	0 (0%)	3 (8%)	20 (56%)	13 (36%)	36 (16%)
Intermediate Sale	0 (0%)	25 (68%)	12 (32%)	0 (0%)	37 (16%)
Private Sale	15 (10%)	58 (37%)	84 (54%)	0 (0%)	157 (68%)
Across Tenure	15 (6%)	86 (37%)	116 (50%)	13 (6%)	230 (100%)

Table 2.4 The Updated Unit Mix.

6.1.43 The proposed mix includes 15 x 1 bed 1 person "studio" flats which appear to have separate bedrooms. Whilst officers do not consider small studio flats intended for single person occupation to provide a long term, sustainable solution to housing need, there are no local or London plan policies specifically precluding the provision of studio accommodation and this type of accommodation is generally found acceptable in town centre locations with high PTAL ratings.

6.1.44 The social rent element would comprise the provision of 33 x two and three- bedroom homes with the mix informed by Latimer by Clarion's understanding of local housing need in Penge. Clarion's core objective is to design, build and manage inclusive neighbourhoods and Clarion's design brief states that the external design of all buildings must be tenure blind.

6.1.45 Overall, it is considered that the proposal provides an acceptable range of housing unit sizes and an appropriate mix of tenures. The affordable units would be well integrated into the development (Blocks D/E and F), which would help to ensure mixed and inclusive communities in line with the Council's objectives for Renewal Areas.

Inclusive Access

6.1.46 Policy D5 of the London Plan seeks to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Policy D7 of the London Plan states that to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people, and families with young children, residential development must ensure that at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings' all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

6.1.47 Policy 4 of the Bromley Local Plan also requires housing developments to achieve a high standard of design and layout, which includes meeting the minimum standards for dwellings

required by the London Plan. The Policy also requires 90% of dwellings to meet Building Regulation requirement M4(2) and 10% to meet requirement M4(3).

6.1.48 The scheme and its immediate surroundings would incorporate suitable means of access for all people from the entrance points, sufficiently wide routes and access ways to allow people to pass each other, principal entrances and lobbies that are identifiable and accessible (for both residential and commercial spaces) as well as independent horizontal and vertical movement that is convenient and ensures that people can make use of all relevant facilities.

6.1.49 The scheme would deliver 18 (M4(3)(2)(a) wheelchair adaptable units and 5 social rented M4(3)(2)(b) wheelchair accessible dwellings across Blocks B/C and D/C. All remaining units would achieve M4(2) standards. The wheelchair user dwellings which the Council would have nomination rights over (SR), would need to meet the South East London Housing Partnership (SELHP) standards, which is a LBB requirement, and this would be secured in any approval.

6.2 Internal Standards and Quality

6.2.1 The NPPF paragraph 130 sets an expectation that new development will be designed to create places that amongst other things have a 'high standard' of amenity for existing and future users.

6.2.2 Policy D6 of the London Plan 2021 sets out a number of requirements which housing developments must adhere to in order to ensure a high-quality living environment for future occupants and to meet the needs of Londoners without differentiating between tenures.

6.2.3 Policy 4 of the Bromley Local Plan seeks to ensure that all new housing developments achieve a high standard of design and layout whilst enhancing the quality the quality of Local Places, and Policy 37 of the Bromley Local Plan requires a high standard of design in all new development, and states that the scale and form of new residential development should be in keeping with the surrounding area.

Internal Floorspace - Acceptable

6.2.4 The requirement to introduce a second staircase in accordance with revised fire safety regulations has resulted in changes to the internal layout of the blocks, however the Accommodation Schedule submitted confirms that the revised proposal maintains the compliance with the minimum internal space standards, as set in Table 3.1 of the London Plan and Nationally Described Space Standards and that the units have been designed with functional and practical layouts. The submitted floor plans include details of furniture and layouts for each of the proposed residential units and the accompanying accommodation schedule indicates the total GIA for each unit. All dwellings would have a minimum floor to ceiling height of 2.5m.

Outlook and aspect - Acceptable

6.2.5 The application site is linear in its nature along a north / south axis, with existing vehicular access points at either end of the site. Due to this, the buildings have principally become linear blocks with a defined north / south orientation (Blocks BC / DE). To maximise dual aspect dwellings, the floorplate has evolved to form a cruciform around a central buried core. This allows for articulation of the buildings' facades with a return of approximately 3m to provide a dual aspect outlook to the dwellings in the centre of the linear block, rather than just those at the end which is a common feature of a typical linear building. The residential core of each block would not serve more than 7 units on each floor. All habitable rooms would be provided with openable windows, in addition to any glazed doors, allowing them to be ventilated.

6.2.6 Across the 230 units within the updated scheme, 149 (65%) dwellings would achieve a dual aspect outlook. On a block-by-block breakdown the scheme achieves the following dual aspect ratios:

- Block A - 25 units - 15 (60%) Dual Aspect
- Block BC - 152 units - 88 (58%) Dual Aspect
- Block DE - 50 units - 43 (86%) Dual Aspect
- Block F - 3 units - 3 (100%) Dual Aspect.

6.2.7 The efforts to minimise the number of single aspect units are recognised and although some north-eastern units would be included in the scheme, officers note that none of the single aspect units would be north facing and there would be no single aspect family homes.

6.2.8 The proposed layout of the scheme and internal distribution of dwellings means that windows serving habitable rooms would generally not be enclosed by adjacent parts of the development. Officers note that outlook from bedrooms orientated inwardly towards the Blenheim Square within the Blocks B/C and D/E and those facing Arpley Mews in Block A would not be optimal given the modest spatial separation between these blocks, however the effect on the living conditions in these rooms would not be unacceptable, therefore, on balance, no objection is raised in this respect.

Privacy

6.2.9 With regard to any potential for mutual overlooking into habitable rooms between residents of the proposed development, the proposal has been generally designed to avoid mutual overlooking between units with directly facing windows.

6.2.10 Officers acknowledge that at approximately 12m the separation distances between Blocks A and B/C and Blocks B/C and D/E would be below a usual window-to-window distances of at least 18m (as recommended by the BRE Guidance). However, such distances are considered as typical to many housing developments in the borough and as such would not be dissimilar to other urban and town centre locations. Further to that, it is noted that the window openings would be positioned in a misaligned manner to afford oblique rather than direct views into habitable rooms (bedrooms). Therefore, notwithstanding these modest distances, it is considered on balance that the degree of potential overlooking would not be harmful enough to justify a refusal.

6.2.11 Direct views between balconies would also be very difficult as they would be blocked by privacy screens and the masonry balcony structure of the adjacent units. Due consideration has also been given to the treatment of public and private space thresholds. Defensible spaces would be provided at ground floor and podium levels to provide privacy buffers between the windows and private balconies/terraces and shared amenity spaces. This is considered necessary to ensure that the privacy of the future occupiers of these units would be adequately protected and would be secured via condition.

Daylight and Sunlight - Acceptable

6.2.12 In order to ascertain the levels of daylight within the proposed development, all habitable rooms have been assessed for daylight quantum using the illuminance method. As such, climate-based daylight simulation has been carried out and the results are compiled by means of the Spatial Daylight Autonomy (sDA) metric.

6.2.13 The application is supported by a technical report by GIA which comprises an internal daylight, sunlight and overshadowing assessment. Given the degree of interest in the proposal, the Council has commissioned an independent review of the report submitted to

verify its findings. This is referred to as the Avison Young review. The amended proposal has been subsequently reassessed in the GIA report dated 7th December 2023.

- 6.2.14 In terms of daylight, the updated assessment results show that 538 (87%) of the 616 rooms assessed would achieve the minimum levels of spatial Daylight Autonomy (sDA) recommended within the UK National Annex for residential buildings. This figure considers the higher recommendation of 200 lux for large, combined L/K/Ds but it would increase to 573 (93%) should 150 lux (suggested for living rooms) be considered acceptable as has been historically common in urban developments.
- 6.2.15 In relation to sunlight, all 230 dwellings have been assessed and 171 (74%) of these achieve at least one and a half hours of sunlight on the equinox within the main living space, as recommended as preferable by BRE. This is an increase of 4% from the previous iteration of the scheme.
- 6.2.16 The report asserts that all the rooms which fall short of the BRE recommendations are situated beneath either projecting or recessed balconies. This is a common situation, one which is anticipated in the BRE guidance as balconies inherently limit the daylight and sunlight ingress into the rooms beneath them by obstructing the direct view of the sky and intercepting the sun rays before they reach the windows below or behind these. The provision of private amenity space to all units is a policy requirement and normally considered as inevitable trade-off of amenity as balconies offer desirable private outdoor spaces for future occupants and mitigation for overheating.
- 6.2.17 The Avison Young review confirms that sunlight exposure is heavily dependent on factors outside the control of the designers, i.e. site context, orientation and local sun path. When aiming to make efficient use of a site this will usually mean the design has to necessarily include some north facing areas, however, the general aim should be to limit these as far as is practicably possible. The review confirms that in overall terms, 89% of the rooms would achieve the recommended target, which is a high level of provision and compliance with the BRE guidance, especially when bearing in mind the inherent site constraints and provision of projecting balconies for private amenity space.
- 6.2.18 In relation to daylight, Avison Young review confirms that in overall terms, the level of compliance with the adopted targets is very good, especially given the density of the proposals and context. A small percentage of proposed habitable rooms which do not meet the UK national Annex target are located whereby the projecting balconies above inevitably reduce their access to daylight. This is a common situation, one which is predicted in the BRE guidance and requires the inevitable trade off/ balanced judgement regarding the provision of private amenity space / overheating mitigation on one hand and reduced daylight on the other.
- 6.2.19 The updated GIA report demonstrates proposal would improve its compliance when compared to the previous submission dated February 2023, with 93% of the living/kitchen/dining and living rooms meeting the recommended target of 150lux.
- 6.2.20 Therefore, given the urban nature of this development within an area planned for renewal, the proposed scheme is considered to provide future occupants with good levels of daylight and sunlight, especially when bearing in mind the inherent site constraints and provision of required private external amenity space.

Overshadowing

- 6.2.21 The proposed development would provide a variety of outdoor amenity spaces (see para 6.2.25 below) and all of these areas have been assessed by means of a Sun Hours on

Ground test, as recommended by the BRE. The result of this assessment demonstrates that all areas would comfortably exceed the BRE default recommendations achieving at least two hours of sunlight to well in excess of 50% of their areas on the equinox (21st March).

External Amenity Space and Children Playspace - Acceptable

6.2.22 Policy D6 of the London Plan requires new housing developments to meet minimum standards for external and internal spaces. For private outdoor spaces, the policy requires a minimum of 5sqm of private outdoor space for 1-2 person dwellings (and an extra 1sqm for each additional occupant). Additional private or shared outdoor space (roof areas, podiums and courtyards) is encouraged.

6.2.23 Local Plan Policy 4c requires 'sufficient external, private amenity space that is accessible and practical. Para 2.1.60 refers to the London Plan minimum standards and requires that ground floor flats have access to private gardens and upper floors should have access to private amenity space. Para 2.1.60 also indicates that developments should relate to the character of existing amenity space.

6.2.24 The proposed development includes a private balcony for all of the units. The Accommodation Schedule submitted confirms that all balconies would either meet or exceed the minimum size requirements for private outdoor space set out in the London Plan.

6.2.25 In addition to that, a variety of communal outdoor amenity spaces are proposed including the podium level gardens of Blocks B/C and D/E, as well as a generous area of public realm proposed at the centre of the site as a shared space with public access. The development would also facilitate the upgrade to the existing area outside of the application boundary - a 'Pocket Park'. The provision of additional external amenity space with a southerly aspect on Level 4 of Block E is welcomed. The size of this additional amenity space is relatively small in relation to the number of residents it could serve but nevertheless represents a positive move.

6.2.26 London Plan Policy S4 Play and Informal Recreation sets out the policy requirements, including in clause B2 for at least 10sqm of good quality, accessible play space should be provided per child that:

- a) provides a stimulating environment
- b) can be accessed safely from the street by children and young people independently
- c) forms an integral part of the surrounding neighbourhood
- d) incorporates trees and/or other forms of greenery
- e) is overlooked to enable passive surveillance
- f) is not segregated by tenure

Supporting text at para 5.4.5 states that formal play provision should normally be made on-site.

6.2.27 The policy does not set this requirement aside where there is existing provision within the acceptable distances, rather paragraph 5.4.6. advises that off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents.

6.2.28 The landscape report produced by Farrer Huxley provides analysis for Penge and its immediate surroundings and shows that whilst there is a range of play space provision within 1km of the site, including Penge Recreation Ground, Alexandra Recreation Ground and Royston Field, within 500m there is a shortfall of provision for play for children up to 11 years old.

6.2.29 Based on the proposed housing mix and tenure, and the site's PTAL level, the estimated child yield of this proposal would be 88 children. This gives rise to a total child play space requirement of 880sqm, of which approximately 433sqm should be allocated to an onsite doorstep play to cater for under 5s.

6.2.30 The proposed development provides 1,550sqm of landscape and routes, including 750sqm of informal play and 550sqm of dedicated equipped/family play. There would be range of different opportunities for dedicated doorstep play for younger children under 5 in the podium gardens and the pocket park, including formal and informal play features. Each podium garden would have an active centre with equipment set in a generous sand play area. The pocket park would introduce trim trails, see saws and sculptural equipment providing opportunities for balancing, jumping and climbing alongside informal play on the way. Youth play for ages 12+ would include spaces to congregate, socialise and participate in informal recreation or physical activity such as wifi points, interactive features, table tennis tables and swings.

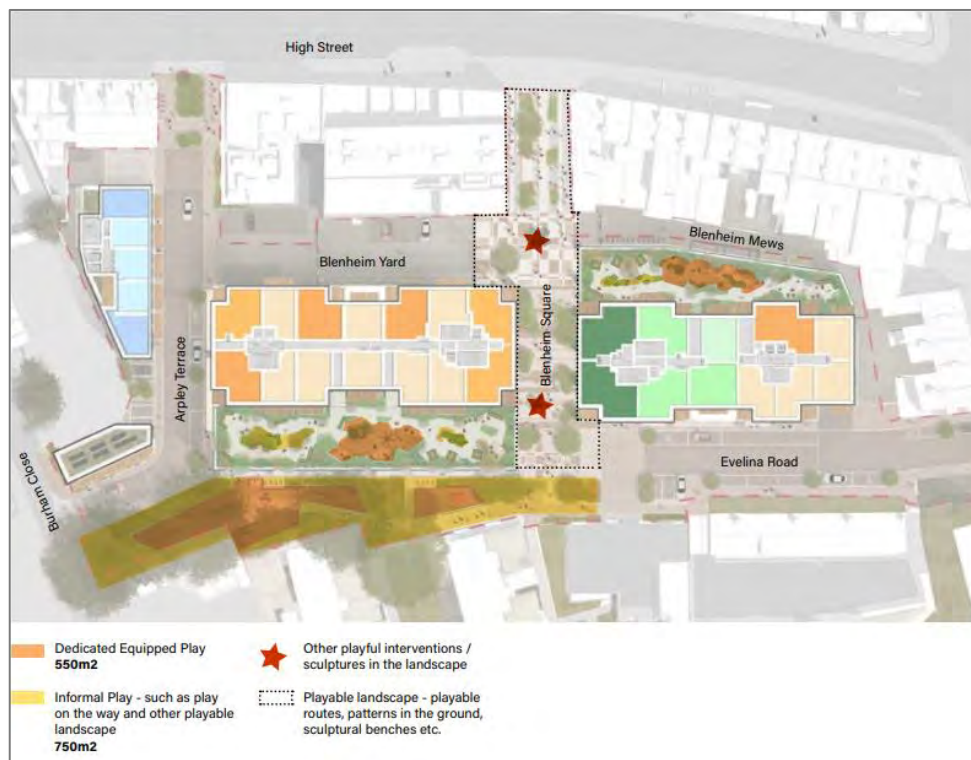


Fig. 6.2 Play Space Provision.

6.2.31 Blenheim Square would provide opportunities for incidental and informal play for all ages, which would link to the overall art and wayfinding strategy for the square with playable landscape, patterning and sculptural elements to explore. Two areas have been indicated for 'playful interventions', interactive art and sculptures. Although no specific detail has been provided, officers are satisfied that the proposal is able to deliver a play space provision of sufficient capacity to ensure that children living in the development would be adequately catered for. Further details of play equipment and its maintenance would need to be secured in any consent through planning condition to ensure it would be genuinely playable and of good quality.

Noise and Vibration - Acceptable

6.2.32 London Plan Policy D13 places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. It states that development should ensure good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area; explore mitigation measures early in the design stage, with necessary and appropriate

provisions, including ongoing and future management of mitigation measures secured through planning obligations; and separation of new noise-sensitive development where possible from existing noise generating businesses and uses through distance, screening, internal layout, sound proofing, insulation and other acoustic design measures.

6.2.33 London Plan Policy D14 seeks to mitigate and minimise the existing and potential adverse impacts of noise within new development. Policy 119 of Bromley's Local Plan seeks to ensure that the design and layout of new development ensures that noise sensitive areas and rooms are located away from parts of the site most exposed to noise wherever practicable. The policy also requires external amenity areas to incorporate acoustic mitigation measures such as barriers and sound absorption where necessary.

6.2.34 A Noise Assessment prepared by Acoustic and Engineering Consultants Ltd in support of the application advises that there are five main noise sources in the area are traffic on the surrounding roads, the building services plant associated with surrounding commercial units which front on to High Street and Croydon Road, respectively; commercial refuse collection activities, activities associated with Royal Mail Anerley Delivery Office which is open 24 hours a day during the week, and The Pawleyne Arms Public House, which has a small external seating area to the rear and a license to play amplified music. Units with external plant facing the site include a McDonalds, KFC and Pizza Hut.

6.2.35 The report details the baseline noise levels measured at the development site, presents the assessment criteria and discusses the implications on the building design, to achieve acceptable internal noise levels as required by the Local Authority. The report concludes that appropriate acoustic measures can be implemented into the design of the proposed development to achieve appropriate acoustic standards as outlined in the assessment. The Council Environmental Health were consulted and considered the proposed noise mitigation measures outlined in the NIA as acceptable. It is noted, however, that one of the suggested measures require mitigation to the KFC plant, which falls outside of the site boundary and applicant's control. The NIA report advises that if mitigation measures are not provided to the KFC plant, the habitable rooms on the north-eastern elevation of Block B/C would need to be provided with mechanical cooling to prevent the need to open a window to control overheating as the external noise levels on elevation at night would be above the allowable external noise level limit and therefore, alternative means to control overheating would need to be provided to all bedrooms in the scheme.

6.2.36 Whilst officers acknowledge the principle of Agent of Change, the location of the site within the town centre location which is a 24h environment is acknowledged and officers consider it reasonable to expect the future residents of the proposed scheme to appreciate the general activity levels and noise to be higher than in other suburban areas. Considerations in relation to the acceptability of potential use of active cooling are included in paragraph 6.9.13 of this report.

Fire Safety

6.2.37 Policy D12 of the London Plan requires a fire safety statement should be submitted which has been prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

6.2.38 Policy D5 of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments, where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments)

should be suitably sized fire evacuation life suitable to be used to evacuate people who require level access from the buildings.

6.2.39 Paragraph 3.1.5 of the Housing Design Standards LP states that Fire safety requirements for a second staircase in taller buildings should be incorporated into the layout of the ground and upper floors and accounted for in the overall form of the building. Second staircases should be successfully integrated with the design of the building to ensure the development meets the housing design standards and the affordable housing requirements in the London Plan.

6.2.40 If approved, the development would also be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body. As part of the planning application process the Health and Safety Executive (HSE) and London Fire Brigade (LFB) were consulted and their respective comments are reported in the consultation section of this report.

6.2.41 The latest revisions to the scheme were undertaken in response to the change in fire safety regulations. The proposal has been revised to accommodate a second staircase in Blocks C and D and consequently the cores of Buildings B/C and D/E have been adjusted. Block A measures 17.7m in height from L00 to L05 (six storeys), therefore a second stair is not required in accordance with the design guidance BS 9991.

6.2.42 The application is supported by a Fire Safety Statement prepared by Design Fire Consultants Ltd which confirms that there are sufficient passive and active design measures incorporated within the proposed scheme, along with suitable emergency procedures in place to protect person and property should a fire occur. The HSE's substantial response confirms that HSE is content with the fire safety design, to the extent that it affects land use planning (full response in paragraph 4.4 of this report), however, HSE has identified some matters that the applicant should try to address, in advance of later regulatory stages. At the time of writing, no response has been received from the LFB and Members will be updated verbally at the meeting.

6.2.43 It is considered that any outstanding matters would be subject to subsequent regulatory assessment under the Building Regulations, which in this case would be dealt with by the Building Safety Regulator given the height of the buildings.

Secured by Design - Acceptable

6.2.44 London Plan Policy D3 states measure to design out crime should be integral to development proposals. Development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety without being overbearing or intimidating. This approach is supported by BLP Policy 37 (General Design).

6.2.45 It is considered the proposed scheme would generate significantly greater pedestrian footfall and would provide opportunities to reduce crime and anti-social behaviour with greater natural surveillance. However, as the increased permeability of the site would increase the amount of potential escape routes in the event of a crime, it is suggested to restrict out of hours pedestrian access and movement through the rear of Blocks B/C and D/E to secure the rear of the High Street properties.

6.2.46 The design out crime officer was consulted during the course of the application and visited the site. No objection was raised, subject to a planning condition requiring the proposed development to achieve Design Out Crime accreditation.

6.4 Urban Design

- 6.4.1 Paragraph 131 of the NPPF (2021) states that 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. London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.
- 6.4.2 London Plan Policy D3 encourages the optimisation of sites, having regard to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity, including transport. It also states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 'Infrastructure requirements for sustainable densities'. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered, including Opportunity Areas. Policy D3 also states that the higher the density of a development, the greater the level of design scrutiny that is required.
- 6.4.3 Policy D4 (D) also states that proposals that include residential component that exceeds 350 units per hectare, or a building defined as a tall building by the borough, or that is more than 30m in height where there is no local definition of a tall building, should be subject to a greater level of design scrutiny.
- 6.4.4 Policy HC3 of the London Plan requires boroughs to identify and include all designated views in their Local Plans, which should also contain local views. Policy HC4 provides a framework for assessing proposals that are sited in the foreground, middle ground and background of designated views and protected vistas. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.
- 6.4.5 Policy 37 of the Bromley Local Plan requires all development to contribute positively to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks or landscape features.
- 6.4.6 Local Plan Policy 47 relates to tall and large buildings, which are defined as "those that exceed the general height of their surroundings and cause a significant change to the skyline". Local Plan Policy 48 states that the Council will require developments which may impact on the skyline to demonstrate how they will protect or enhance the quality of the views, vistas, gaps and skyline of views of local importance. This includes the view from Crystal Palace Park of Bromley, Beckenham and West Wickham.

Optimising development capacity - Acceptable

- 6.4.7 Whilst the London Plan does not contain prescribed density thresholds, it does advocate optimisation of sites at sustainable densities. Whilst the NPPF does not advocate optimisation of sites with significant uplifts in the average density of residential development if the resulting built form would be wholly out of character with the existing area, officers have regard to Paragraph 129 of the Framework which advises that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities, and that developments make optimal use of the potential of each site. Paragraph 124(d) further advises that planning policies and decisions should also promote and support the development of under-utilised land and buildings and cites car parks as such land.
- 6.4.8 Penge being a District Town Centre would fall within the urban classification with a PTAL rating of 4/5. The site measures 1.02ha and the consequently the proposed scheme would

achieve a density of 225 units per hectare or 603 habitable rooms per hectare. It is considered that the proposed quantum of development on site and the resulting density are generally considered acceptable. Detailed assessment of the townscape and amenity impacts are assessed in the subsequent sections of this report.

Layout - Acceptable

- 6.4.9 The opportunity to replace Blenheim Shopping Centre – an ageing building of poor quality and redevelop the site to provide new homes, an improved commercial offer, and new public realm/amenity space is welcomed. It is important that any new development makes a positive contribution to the High Street setting and has an appropriate relationship with neighbouring buildings and the wider surrounding context.
- 6.4.10 The site layout informed by the historic street structure and urban grain to create a series of legible routes and connections is supported by officers. The characteristics of the site suit a linear layout. The creation of a new east-west pedestrian link and clearly defined public realm spaces each with their own character and purpose including Blenheim Square, Arpley Terrace, and a new linear pocket park have the potential to transform and humanise the existing austere and car dominated environment.
- 6.4.11 The proposal would enable the smaller commercial unit to activate, and benefit from, greater pedestrian footfall generated by the east-west link and Blenheim Square – compensating for the lack of direct visual presence on the High Street. The latest reconfiguration of the ground floor of Block B/C and Block D/E creates more efficient commercial spaces fronting Blenheim Square.
- 6.4.12 The proposed changes to the ground floor plan of Block D/E to further activate the western edge (fronting Evelina Road) with the introduction of a residents co-work space with additional glazing along with the provision of ‘feature wall’ panels for potential public art installations to create a more engaging and appealing street level environment are welcomed. The proposals represent a notable improvement to what was previously a predominantly blank inactive frontage.
- 6.4.13 Officers are also supportive of the introduction of maisonettes fronting the pocket park animating the space and activating the western edge.
- 6.4.14 The proposed gated enclosure of the service yard to the rear of Coleman House and the treatment (and management) of the existing loading area(s) would be key to resolving the inherent conflict between the functional servicing (vehicle) requirements of the site and the new public realm (pedestrian) spaces being created. An effective servicing strategy would therefore be fundamental to the placemaking aspirations of the scheme, as the success of the new public realm would be dependent upon the management of the service yard area and the high volume of motorcycle couriers which would continue to access/egress the site and potentially compromising the function and feel of the public realm spaces/character areas being created.
- 6.4.15 Further to the above, as several key spaces fall outside of the applicant’s ownership including Empire Square, Arpley Square, and the existing amenity green to the west, appropriate planning mechanisms would need to be put in place to deliver the full extent of the masterplan as proposed and to secure the future maintenance.

Height, Scale and Massing - Unacceptable (Marginally)

- 6.4.16 In accordance with London Plan and Local Plan requirements, tall buildings should be part of a plan-led approach and require a strong townscape justification. Building height and massing should be appropriate both in terms of the relationship with neighbouring buildings

(immediate context) and the relationship with the wider context (townscape/skyline). The site has not been identified as an appropriate site for a tall building in the Local Plan and forms part of a low-rise local District Centre.

6.4.17 The proposed development represents a significant step change in scale from the existing low-rise surrounding context and would have a considerable impact on the wider townscape in terms of views and visual prominence. Whilst it is accepted that the site can potentially accommodate a single taller element as a visual marker for the District Centre, throughout the application process officers have maintained their opinion that further reductions in height across the scheme should be considered. The views from the west (looking east) are also of particular importance in demonstrating the extent of the proposed step change in scale across the scheme as a whole. View 23 of the Heritage and Townscape Views Impact Assessment Addendum by Townscape Consultancy submitted in support of the revised application illustrates the importance of minimising the actual and perceived step change in scale, bulk and mass.



Fig. 6.4.1 View 23 - Amended Proposed Development: footpath southwest of site (HTVIA Addendum).

Block A

6.4.18 Block A remains at 6 storeys. Both the GLA Design Officers and the Design Review Panel advised that the building would benefit from a further reduction in height, by another storey in order to respond better to low-rise neighbouring buildings.

6.4.19 As part of post-submission negotiations, the applicant presented to officers in September 2023 an iteration of the proposal with a reduction in the height of Block A to 5 storeys. Officers have confirmed that the proposed height reduction was welcomed. It is therefore disappointing to see this amendment has been removed from the revised plans submitted. It is noted that the proposed mezzanine has been removed from Block A reducing the maximum measured height from 24m to 22.5m whilst still providing 5 storeys of residential accommodation above ground floor commercial space. However, it is likely that the block would still 'read' as a 6-storey building at street level.

Block B

6.4.20 The proposed reduction in the height of Block B to part 8/part 9 storeys (from 9 storeys) is welcomed. However, similar to Block A above, the extent to which the 9th floor setback element shown to officers in September 2023 was much greater than that which is currently proposed in the revised plans. As previously advised, a maximum height of 8 storeys for Block B is considered to sit more comfortably as a backdrop to the smaller scale High Street datum.

6.4.21 The HTVIA Addendum View 18 illustrates how the visual impact of the 9th floor setback element would not be too dissimilar to the full storey initially proposed – due to the minimal extent of the setback. As a result, the extent to which the revised scale/height of Block B would be ‘read’ at street level and/or result in a reduced townscape impact is considered to be minimal – this is evident when comparing the previously submitted and revised elevations and HTVIA Addendum views (Fig.6.4.2 below).





Fig. 6.4.2 View 18 - As Submitted and Amended Proposed Development: High Street, looking west (HTVIA Addendum).

6.4.22 The proposed use of coloured metal cladding for the treatment of the 9th floor 'setback' on Block B to 'lessen its visual prominence' (Fig. 6.4.3) is questionable. Given the minimal setback provided, it is considered that the use of a different material may have the opposite effect to that which is intended – i.e. increasing the visual prominence and drawing attention to the top floor element of the building (Fig. 6.4.2 and Fig 6.4.3).



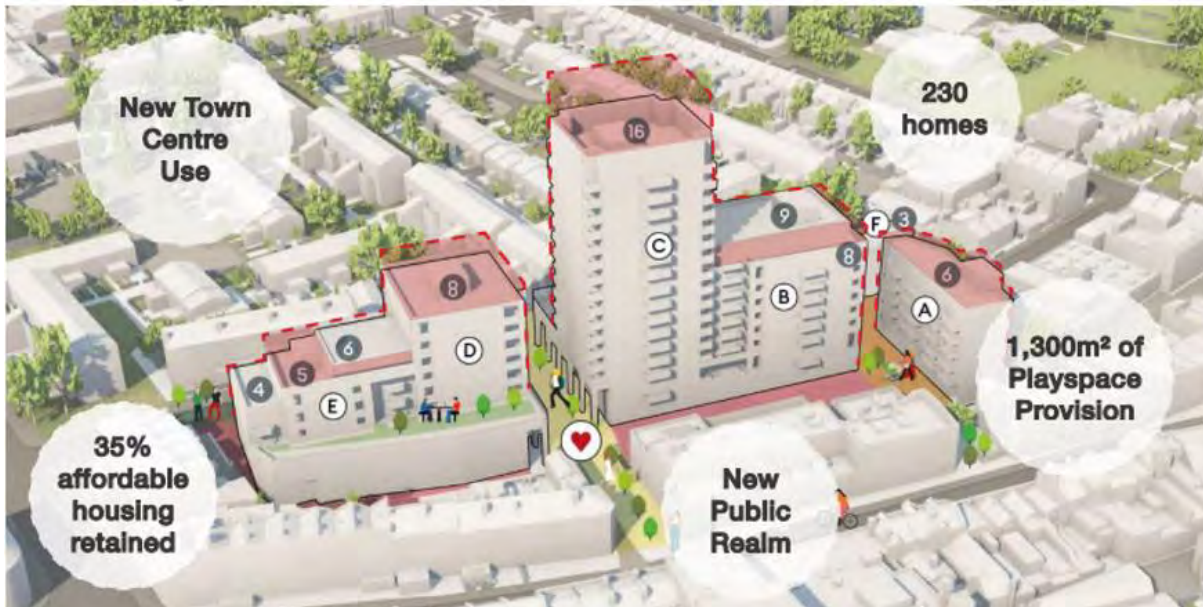


Fig. 6.4.3 Previous and amended Massing (Planning Addendum Report).

Block C

6.4.23 The reduction in the height of Block C from 18 storeys to 16 storeys is welcomed and considered to be a more acceptable maximum height for a single taller element providing a visual marker for the District Centre.

Blocks D/E

6.4.24 The reduction in the height of Block D from 9 storeys to 8 storeys is welcomed as is the reduction in the height of Block E by one (part) storey.

6.4.25 Overall, the revised building heights, scale and massing represents an improvement on the scheme initially submitted. However, the height reductions are relatively minor and would not significantly reduce their townscape impact. As such, officers feel that the amendments made do not fully mitigate for the visual impact of the proposal on the wider townscape and the immediate low-rise suburban context. The prominence and visual impact of the proposed buildings in this setting would remain significant.

Architecture - Acceptable

6.4.26 Tall buildings need a narrative and should be grounded in their context, the quality of materials and detailing and the extent to which they derive from, and reference, local character and identity is key to creating a sense of place.

6.4.27 The proposed changes to the material palette retaining a buff brick podium base and introducing a lighter stock brick for Block C and a darker red brick for Blocks A, B, D and E are welcomed. The decision to differentiate the tallest element with a contrasting brick tone whilst still retaining the 'rule of 3' across the scheme is considered to be the right approach. This would avoid the perception of a singular unbroken red 'wall of development' and enable the blocks to read individually whilst forming part of a cohesive whole.

6.4.28 The revised colour of the tallest element (Block C), in particular, makes it appear more recessive and less visually imposing. The removal of the solid infills at the top of the block to create a more refined open crown is welcomed as it would further reduce its visual impact and help to establish a stronger sense of identity within the wider townscape skyline. However, the proposed use of coloured metal cladding for the treatment of the 9th floor

'setback' on Block B to 'lessen its visual prominence' is questionable, as already highlighted above.

6.4.29 Full details of the proposed materials and finishes are required by condition. It is also considered appropriate that a retention of original architect clause is included within a S106 Agreement in order to maintain the quality and integrity of design through the delivery phase.

Tall Building Impacts - Acceptable

6.4.30 The applicant has also provided in Appendix 1 of the Planning Statement an assessment of the proposed development against the criteria of Policy D9 which sets out specific criteria to assess the acceptability of tall buildings, including their visual, functional, environmental and cumulative impacts. From a technical perspective, the proposed development would not interfere with aviation, navigation or telecommunication and the utilities and services of adjoining buildings as outlined in the construction management plan. Air quality, noise and vibration impacts are considered in the appropriate sections of this report. With the identified mitigation, the proposed development is also expected to have a suitable and safe wind microclimate for the intended use at all areas. This is further analysed below. It is also accepted that there are no other emerging developments in the vicinity of the site which would warrant inclusion of cumulative assessments.

Wind Microclimate Assessment

6.4.32 The Pedestrian Level Wind Microclimate Assessment conducted by RWDI confirms that conditions would be windier as a result of the proposed development when compared to the existing site condition. Wind conditions would range from suitable for sitting to walking use for all uses during the windiest season. During the summer season, wind conditions would range from suitable for sitting to strolling use at ground and terrace level. Although the majority of wind conditions would be suitable for the intended use, several locations, including isolated areas of Blenheim Square, commercial entrances to Block A and Block D, the seating areas at the Building B/C Level 2 terrace and the south-west balconies at Building A required mitigation measures to achieve a suitable wind environment.

6.4.33 Following the findings of the report, mitigation measures were subsequently developed and incorporated into the design of revised proposals submitted. These included changes to the ground level landscaping with additional planted hedging and trees, the relocation of seating and a revised proposed balustrade design for balconies on the south-west corner of Block A. RWDI have undertaken a qualitative review of the likely wind microclimate impacts of the adjustments to the design of the proposal. Their Statement of Conformity dated 1st December 2023 concludes that with the proposed mitigation strategy in situ all wind conditions would be safe and suitable for the intended use and proposed development and that no further wind mitigation measures would be required. It also confirms that the additional emergency exits and additional amenity terrace in Block E would be expected to have suitable wind conditions for the intended use.

6.5 Heritage

6.5.1 The existing shopping centre building is not listed, and its heritage value is limited. The small portion of the site that falls within the boundaries of the designated Penge High Street Conservation Area conservation area is Arpley Square. None of the proposed buildings would be within the conservation area. The immediate surrounding area contains a number of designated and non-designated heritage assets. The application site is located within a Tier IV Archaeological Priority Area.

Impact on the Heritage Assets - Unacceptable

- 6.5.2 Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) impose a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings. Section 72 of the Act requires local authorities to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 6.5.3 Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes clear at Paragraph 205 that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm or loss should require clear and convincing justification and where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (Paragraph 208). Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. The NPPG notes that in general terms, substantial harm is a high test and may not arise in many cases.
- 6.5.4 London Plan Policy HC1.C states 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. Policy D9 on tall buildings states that proposals should avoid harm to the significance of heritage assets and their settings.
- 6.5.5 BLP Policy 42 states proposals 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.
- 6.5.6 The application is supported by the Heritage and Townscape Visual Impact Assessment (HTVIA) by the Townscape Consultancy and its subsequent addendum – HTVIA Addendum (November 2023) which consider 24 views of the proposal. The assessment identifies that the setting of the following heritage assets could be impacted by development:

Listed Buildings:

The Church of St John the Evangelist High Street (Grade II)
The Royal Naval Asylum, St Johns Road (Grade II)
The Royal Watermen's and Lightermen's Asylum (46 Almshouses), High Street (Grade II)
50 High Street (Grade II)
The White House, High Street (Grade II)
Penge War Memorial, High Street (Grade II)
The Cattle Trough, Green Lane (Grade II)
The Congregational Church, High Street (Grade II)
Penge Holy Trinity War Memorial, Holy Trinity Church (Grade II)
Penge East Railway Station, Station Road (Grade II)

Registered Parks and Gardens of Special Historic Interest:

Crystal Palace Park (Grade II*)

Conservation Areas:

Penge High Street

Alexandra Cottage (Parish Lane)
Barnmead Road, Beckenham
Aldersmead Road, Beckenham
Cator Road, Sydenham
Crystal Palace Park

Locally Listed Buildings:

St Johns Cottages
Former Police Station (175 High Street)

- 6.5.7 The HTVIA reaches the conclusion that the proposed development would enhance the character, appearance and setting of the Penge High Street Conservation Area and there would be no harm caused to the significance of any heritage assets in the surrounding area. Despite this conclusion, both Historic England (HE) and the Council's Conservation Officer objected to the application on the grounds of harm to a range of designated heritage assets. The level of harm using the NPPF definition was considered to be less than substantial.
- 6.5.8 In their original comments, HE considered that the HTVIA reveals that harm from the proposal would result principally due to the incongruous scale of proposed 18-storey tall building within the low-rise suburban surroundings. The proposals would be visible across a wide area including the Penge High Street Conservation Area, Watermen's Square, the Alexandra Cottages Conservation Area and Barnmead Road, and would cause harm to their significance. Additionally, HE's own assessment using 3D modelling identified some likely harm to the setting of the Grade II St John's Church from St John's Road, and the Aldersmead Road Conservation Area from Cator Park. The harm to the Alexandra Cottages Conservation Area was found to be particularly regrettable due to the rarity of this type of planned 'improved' housing within a suburban London context. However, this harm also related to nationally significant sites, the most affected being the Grade II listed Royal Watermen's and Lightermen's Almshouses.
- 6.5.9 Based on the updated visual assessment which presented alongside visuals of the original scheme (Heritage and Townscape and Visual Impact Assessment Addendum) Historic England and the Council's Conservation Officer confirmed that the visual impact of the revised tall building in the views previously identified would be slightly less than the original scheme due its lower height. The rendered views also suggest that the buff brickwork tones would slightly soften the impact when compared with the original scheme. Consequently, the harm to the heritage assets previously identified is considered to be slightly reduced.
- 6.5.10 Although no additional assessment on the impact on Grade II St John's Church from St John's Road and the Aldersmead Road Conservation Area from Cator Park has been provided in the amended submission, HE advised that it is likely that the harm to these heritage assets has also been slightly reduced through the lower height of the proposed tall building. Amended corresponding views from/to the Penge High Street Conservation Area (Fig. 6.5.1), Watermen's Square (Fig. 6.5.2 and Fig. 6.5.3), the Alexandra Cottages Conservation Area (Fig. 6.5.4) and Barnmead Road (Fig. 6.5.5) are provided below.



Fig.6.5.1 View 2 - Amended Proposed Development: High Street, adjacent to Watermen's Square (Penge High Street Conservation Area), looking south-east (HTVIA Addendum).



Fig. 6.5.2 View 3a - Amended Proposed Development: Watermen's Square (Penge High Street Conservation Area), looking south-east (HTVIA Addendum).



Fig.6.5.3 View 3b - Amended Proposed Development: Watermen's Square (Penge High Street Conservation Area), looking south-east (HTVIA Addendum).



Fig. 6.5.4 View 4 - Amended Proposed Development: Albert Road (Alexandra Cottages Conservation Area), looking south-west (HTVIA Addendum).



Fig. 6.5.5 View 4 - Amended Proposed Development: Albert Road (Alexandra Cottages Conservation Area), looking south-west (HTVIA Addendum).

6.5.11 Notwithstanding the above, in the view of Historic England this remains a tall building development which, due to its overall scale and massing, would have harmful impact on a wide range of designated heritage assets in the area as previously set out. Due to the harm identified, and the lack of local policy support for the development of a tall building in this location as previously set out, HE remain unable to support this application (full comments from HE in section 4 of this report).

6.5.12 Although not statutory, objections to the proposal were received from the Victorian Society and the Advisory Panel for Conservation Area (see section 4 of this report).

6.2.13 The harm identified is weighed against the public benefits of the proposal in the conclusions section of this report.

Archaeology - Acceptable

6.5.14 The application site is located within a Tier IV Archaeological Priority Area.

6.5.15 Section 16 of the NPPF and London Plan Policy HC1.D requires that a development proposal should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

6.5.16 A desk top assessment undertaken by Prospect Archaeology concludes that the potential for any archaeological activity to exist within the site is generally low and where there is a medium potential, the significance of the archaeological resource is assessed as no more than on local level. Prospect Archaeology recommended that any geotechnical test pits should be monitored to allow an assessment of the potential for archaeological survival outside the footprint of the existing buildings.

6.5.17 The assessment submitted was reviewed by Historic England (Archaeology) Team who confirmed that the development could cause harm to archaeological remains and field

evaluation is needed to determine appropriate mitigation although the NPPF envisages evaluation being undertaken prior to determination, in this case given the nature of the development, the archaeological interest and/or practical constraints are such that a two-stage archaeology condition could provide an acceptable safeguard. This would comprise firstly evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. A suggested pre-commencement condition is recommended to this effect.

6.6 Impact on Residential Amenity

6.6.1 BLP Policy 37 requires development 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.

Daylight, Sunlight and Overshadowing - Acceptable

6.6.2 The application is supported by a technical report by GIA which comprises an assessment of daylight, and sunlight impact on neighbouring properties. A daylight/sunlight analysis was undertaken of the surrounding residential buildings using the Vertical Sky Component (VSC), No Sky Line (NSL) and Annual Probable Sunlight Hours (APSH) tests².

6.6.3 A significant level of objections has been received as acknowledged in section 3 of this report regarding the potential sunlight, daylight and overshadowing impacts. Given the number of the objections received on these grounds, the GIA November 2022 report has been subject to a third-party review by Avison Young (referred to as the Avison Young review) on behalf of Bromley Council, dated June 2023.

6.6.4 Changes in daylight and sunlight occur to the following 18 out of 69 properties relevant for assessment. The impacts are fully discussed in the following paragraphs:

- 126-128 High Street
- Colman House
- John Baird House
- 2, 4 and 8 Croydon Road
- 132-138 High Street (Evens)
- 144 and 146 High Street
- 1-11 Strood House
- 1-11 Greatstone House
- 137-141 High Street (Odds)
- 153-155 High Street
- 5 Burham Close
- 10 Pawleyne Close

² The Vertical Sky Component (VSC) quantifies the amount of available daylight, received at a particular habitable 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%. If the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, then the occupants of the existing building will notice the reduction in the amount of skylight. The No Sky Line (NSL) measures internal Daylight Distribution, i.e. identifies those areas within the room where there is direct sky visibility. Annual Probable Sunlight Hours (APSH) method is based on the long-term average of the total number of hours during the year with direct sunlight exposure. The default recommendation is 25% APSH, of which 5% should be in winter months. Where existing windows do not face within 90° of due south, as set out in the BRE guidance these do not need to be assessed.



Fig. 6.6.1 Proposed Development and the Surrounding Neighbouring Properties (Daylight and Sunlight Impact on Neighbouring Properties Report).

Daylight

6.6.5 The Avison Young review confirmed that in terms of the VSC majority (i.e. 335 of 515 windows assessed or 65%) would record unnoticeable VSC differences post-development or retain in excess of the default BRE Guidelines recommendations. In general terms this may be considered a relatively good level of adherence with the default BRE Guidelines when taking into account the context and proximity of existing neighbours.

- 62 windows (12% of the total assessed) record between 20% and 30% difference, which the BRE considers may be noticeable. These may be best understood as a minor adverse impact;
- 27 windows (5% of the total assessed) record between 30% and 40% VSC difference, which the BRE considers noticeable. These may be best understood as a moderate adverse impact;
- 91 windows (18% of the total assessed) record over 40% difference, with the greatest difference being up to 100%. These are best understood as major adverse impacts. These major adverse VSC effects would be mainly recorded at Colman House, John Baird House, 2-8 Croydon Road, 126-128, 132-138 and 144/146 High Street.

6.6.6 The review sets out that the majority (i.e. 268 of 352 rooms assessed or 76%) would record unnoticeable NSL differences post-development or retain in excess of the default BRE Guidelines NSL recommendation. In general terms this may be considered a good level of adherence with the default BRE Guidelines when taking into account the context and proximity of existing neighbours.

- 24 rooms (7% of the total assessed) record between 20% and 30% difference, which the BRE considers may be noticeable. These may be best understood as a minor adverse impact;
- 15 rooms (4% of the total assessed) record between 30% and 40% VSC difference, which the BRE considers noticeable. These may be best understood as a moderate adverse impact;

- 44 rooms (13% of the total assessed) record over 40% difference, with the greatest difference being up to 72%. These are best understood as major adverse impacts. These major adverse NSL effects would be mainly recorded at Colman House, John Baird House, 2-8 Croydon Road, 126-128, 132-138 and 146 High Street.

126 – 128 High Street

- 6.6.7 The property is located to the northeast and is directly adjacent to the site. In terms of both daylight and sunlight impact, the changes would represent a major adverse effect (with up to 100% losses) and demonstrate low retained values. This is due to a combination of the proximity to the proposed development site, lack of any meaningful obstructions in the existing scenario and presence of self-limiting projecting walkways and overhangs. The Avison Young review advises that the affected rooms would be mainly non-habitable, or bedrooms. These rooms are either predominantly night-time use or used for short periods and on this basis these room types have a lowered requirement for natural illumination and therefore these affects may be considered to have less impact to the overall amenity of the dwelling. Therefore, a balanced judgement should be undertaken of the entire dwelling when determining acceptability. In this instance, the main living areas, where access to natural light is typically most important, are unaffected given they face towards the High Street.
- 6.6.8 When also considering the impact to the daylight of the rooms, it is also important to take into consideration the existing condition with overhanging walkways. When reviewing the 'Without Obstruction' assessment, there is marked improvement to the retained daylight and sunlight levels of these rear facing windows.

Colman House

- 6.6.9 This property is located to the northeast and is directly adjacent to the site. Each living room would achieve the default sunlight values recommended by BRE. In terms of daylight, the changes would represent major adverse effects, including some 100% VSC losses. The affected windows serve five living rooms or living kitchen diners, in each case due to the open plan nature of these rooms, there are additional windows allowing light to these rooms facing onto the High Street and therefore away from the site. The NSL results for the affected living areas take into account all windows serving them, as such the results are all fully adherent with the default BRE guidelines recommendations. Noticeable NSL changes would be observed in respect of the remaining affected windows which serve bedrooms and non-habitable kitchens. Most of these windows have low existing levels of light due to a substantial overhanging roof located above the windows. As these rooms are either predominantly night-time use or used for short periods and have a lowered requirement for daylight, a balanced judgement should be undertaken of the entire dwelling when determining overall acceptability.
- 6.6.10 It was considered in the Avison Young review that to better understand the daylight levels in the affected living rooms, a Climate Based Daylight Modelling assessment (CBDMD) should be undertaken.
- 6.6.11 The results of the CBDMD analysis provided in the updated GIA report demonstrates that, in both methods of assessment (the Illuminance and the Daylight Factor), with the proposed scheme in place, the living rooms would exceed the target values for a living room (i.e 150 lux and 1.1% DF - 1.4% DF). The CBDMD assessment therefore confirms that whilst there would be impacts in numerical values, the daylight levels in the main habitable spaces of the Colman House (living rooms) would not be affected by the scheme also given that the main windows serving these rooms face away from the site.

John Baird House

6.6.12 This property is located to the south-west of the site, comprising duplex apartments. The potentially affected windows are northly facing and therefore do not require sunlight assessment, as set out in the BRE guidance. In terms of daylight impact, the changes would represent negligible to major adverse effects, however, the Avison Young review generally confirms limited effect to the potentially affected areas of the property, on the basis of retained values being acceptable for a dense urban context and the self-limiting design of the property (located opposite the open part of the existing site and affected by the tallest elements of the proposed development).

2, 4 and 8 Croydon Road

6.6.13 This property is located to the north-east of the site. The potentially affected windows would either achieve the default BRE guidance for sunlight (No. 2 Croydon Road) or are northly facing and therefore do not require sunlight assessment. In terms of daylight impact, the changes would represent minor to major adverse effects, due to some windows having low baseline VSC (whereby even small absolute changes of VSC can be expressed as potentially misleading high percentage differences) which indicates disproportionate reliance on light from the direction of the application site with the actual/ absolute loss being small. The Avison Young review confirms limited effect to the potentially affected areas of these properties, on the basis of retained values being acceptable for a dense urban environment or the self-obstructing location/ design of the properties.

132-138, 144 and 146 High Street

6.6.14 These properties are located to the north-east of the site. The potentially affected windows would achieve the default BRE guidance for sunlight or would retain good values for a dense urban environment (No. 136 High Street). In terms of daylight, the changes would represent moderate to major adverse effects, however, the Avison Young review confirms limited effect to the potentially affected areas of these properties, on the basis of retained values being good or reasonable for a dense urban context.

1-11 Strood House

6.6.15 This property is located to the south-west of 1-11 Greatstone House and most of its windows appear to be facing away from the site. The sunlight assessment showed limited effect, with all windows achieving the default BRE sunlight recommendation. In terms of daylight impact, the changes would represent a minor adverse effect. The Avison Young review confirms limited effect to the potentially affected areas of the property, on the basis of retained values being good for a dense urban context.

1-11 Greatstone House

6.6.16 This property is located to the southwest of the site. The sunlight assessment showed limited effect, with good annual sunlight values retained throughout. In terms of daylight impact, a small number of windows would experience a loss greater than 20% and retain VSC values ranging from low double to mid-teens (minor adverse impact). The Avison Young review advises limited effect to the potentially affected areas of the property, on the basis of retained values being acceptable for a dense a dense urban environment. It appears that the main windows face away from the proposed development and therefore unaffected.

137-141 High Street

6.6.17 These properties are located to the north-east of the site. The potentially affected windows would retain sunlight values in excess of the default BRE guidance. In terms of daylight

impact, the changes would represent minor to moderate adverse effects. The Avison Young review generally confirms limited effect to the potentially affected areas of these properties, on the basis of retained values being very good for a dense urban context.

153-155 High Street

6.6.18 This property is located to the north-east of the site. The potentially affected windows would retain sunlight values in excess of the default BRE guidance. In terms of daylight impact, the changes would represent negligible to minor adverse effects, with one room considered to experience major adverse effect in terms of the NSL. The Avison Young review confirms limited effect to the potentially affected areas of the property, on the basis of retained values being very good for a dense urban environment.

5 Burham Close

6.6.19 This property is located to the south-west of the site. The potentially affected windows would retain sunlight values in excess of the default BRE guidance. In terms of daylight impact, the changes would represent minor to moderate adverse effects. The Avison Young review confirms limited effect to the potentially affected areas of the property, on the basis of retained values being good for a dense urban environment.

10 Pawleyne Close

6.6.20 This property is located to the south of 1-11 Strood House. The potentially affected windows are northly facing and therefore do not require sunlight assessment, as set out in the BRE guidance. In terms of daylight impact, the changes would represent negligible to minor adverse effects. The Avison Young review confirms limited effect to the potentially affected areas of the property, on the basis of retained values being good for a dense urban environment.

Sunlight

6.6.21 The review confirms that the majority (i.e. 304 of 359 windows assessed or 85%) would record unnoticeable differences post-development or retain in excess of the default BRE Guidelines ASPH recommendation. In general terms this may be considered a good level of adherence with the default BRE Guidelines when taking into account the context and proximity of existing neighbours. The remaining 55 windows would record losses of up to 100% in places.

Overshadowing

6.6.22 The inherent site orientation and degree of overshadowing are outside the control of the designer and the BRE guidelines accept that it is not always feasible to have all living areas facing south, especially in denser development when seeking to make most efficient use of the available site area. The neighbouring amenity spaces have been assessed by means of a Sun Hours on Ground test, as recommended by the BRE. The result of this assessment demonstrates that all areas would comfortably exceed the BRE default recommendations achieving at least two hours of sunlight to well in excess of 50% of their areas on the equinox (21st March).

Summary

6.6.23 The application site context is dense/ urban with several self-obstructed neighbours (projecting walkways and overhangs) in close proximity. The existing site has several areas in use as surface car parking meaning it features no significant buildings and massing. This

is confirmed by some baseline daylight and sunlight values which are usually high and more consistent with a rural environment as opposed to a dense urban setting. As set out in the BRE guidance, in these circumstances increasing massing of the site would inevitably result in changes to baseline values, therefore a degree of flexibility needs to be applied.

6.6.24 The GLA and Planning Inspectorate have established that in a dense urban environment, VSC values in excess of 20% should be considered as reasonably 'good', and VSC values of 15%-20% should be 'acceptable'. Further to this, it is accepted that in suitable locations there should generally be a high expectation of development taking place.

6.6.25 In general conclusion, the impacts of the proposed development would be noticeable, however the inherent site factors summarised above are considered to place a potentially unfair burden on this highly accessible and brownfield site, as any meaningful intensification of the proposed development would inevitably produce the observed effects or similar. In the light of this, and on balance, the proposal is considered to be acceptable in respect of the sunlight, daylight and overshadowing impacts. s

Privacy/Outlook – Unacceptable



Fig. 6.6.2 3D Perspective View of the Proposed Scheme (Daylight and Sunlight Impact on Neighbouring Properties Report).

Blenheim Estate

Greatstone House and Burham Close

6.6.26 The resulting distance to the closest properties of Greatstone House and Burham Close would generally exceed 22m on the upper levels of the blocks and 15m within the podium. It is considered that such spatial relationship would adequately ensure that the privacy and aspect currently enjoyed by the occupiers of these properties would not be unduly compromised. Additionally, officers note that only flank elevations of Greatstone House and 5 Burham Close would directly face the tallest parts of the proposal (Block B/C). These

elevations feature limited secondary and/or non-habitable windows, and due to the orientation of the buildings would offer oblique views of the development.

John Baird House

6.6.27 The main habitable rooms of properties in this building would directly face the proposal, however Block E opposite would only extend to 6 storeys, with two top floors being recessed. A minimum distance of at least 18m would be achieved. Such spatial relationship represents a typical privacy distance recommended by the BRE guidance and is characteristic for urban locations in the borough.

High Street

132-154 High Street

6.6.28 The window-to-window distance from Block D/E to residential properties located above the commercial ground floors would range from at least 22m on the upper floors to over 16m within the podium. The resulting relationship would be comparable to many urban locations in the borough and on balance acceptable considering the staggered mass of the proposed block and heights not exceeding 8 storeys. The planted zone around the perimeter of the podium amenity space would act as an additional buffer zone that would soften the visual impact and ensure that the neighbouring buildings are not overlooked from the communal amenity space.

Colman House

6.6.29 The proposal would maintain a window-to-window separation distance of at least 21m. Such spatial relationship is typical and generally considered as adequate to ensure that the privacy and outlook would not be unduly affected. Whilst officers fully acknowledge the rear windows of this property would directly face the tallest element of the development (Block B/C) which would raise to 16 storeys, it is noted that majority of these windows serve bedrooms and non-habitable kitchens. The 5 living rooms/living kitchen dining rooms that could be affected are open plan and have additional windows facing onto the High Street and therefore directed away from the site. It is therefore considered that on balance that the degree of potential overlooking and/or sense of overbearingness would not be harmful enough to justify a refusal.

126-128 High Street

6.6.30 At 6 storeys, the relevant part of Block A, which would feature a blank recessed elevation, would be located approximately 18m away from the rear windows of No. 126 High Street. A distance to No.128 would achieve an approximate separation of 12.5m, therefore raising concerns over the potential amenity impacts. The main living areas would remain unaffected given they face towards the High Street. The rear of 126-128 High Street accommodates entrance spaces and small kitchens on the first floor, and bedrooms on the second floor. These rooms are either predominantly night-time use or used for short periods of time and on this basis have a lowered requirement for outlook. Further to this, the rear windows are restricted by an overhanging walkway at first floor and overhanging roof eaves on the second floor (Fig. 6.6.3). These obstructions serve to limit both the 'in' and 'out' views thereby affecting the outlook and privacy. On balance, the degree of potential perceived overlooking and/or sense of enclosure is not considered harmful enough to justify a refusal.



Fig. 6.6.3 The Rear Elevation of 126-128 High Street (Daylight and Sunlight Impact on Neighbouring Properties Report).

2 – 10 Croydon Road

6.6.32 The minimum separation distances of between 9m (No. 2 Croydon Road) and 12m (No. 10 Croydon Road) would fall short of the typical privacy distance recommended by the BRE guidance. It is noted that due to the distribution of height and mass in Block D/E the closest element of the proposed development would only extend to 4 storeys in height, the resulting spatial relationship would be uncomfortable and likely to materially affect the levels of privacy and outlook currently enjoyed by the occupiers of these properties.

Noise and Vibration - Acceptable

6.6.33 Given the proposed mixed-use of the site no undue noise and disturbance issues would likely to arise over and above those currently experienced by the surrounding residential properties. In order to protect the amenity of the residential properties, should planning permission be granted, appropriate conditions would be attached regulating the hours of operation and deliveries to the commercial units within the proposal. Demolition and construction activities are likely to cause some additional noise and disturbance, traffic generation and dust. Should permission be granted, a number of conditions would be imposed to minimise these impacts.

6.6.34 In an overall summary, whilst the proposal is considered to satisfactorily respond to the constraints of the site, there would be isolated instances of material impact on residential amenities currently enjoyed by the existing neighbouring occupiers, particularly in respect of outlook and privacy. Officers need to have due regard to the regeneration benefits of the scheme which are considered in the conclusions section of this report.

6.7 Transport and Highways

Sustainability of location for significant development - Acceptable

6.7.1 Paragraph 109 of the NPPF 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. This can help to reduce congestion and emissions, and improve air quality and public health. Policy T1 of the London Plan requires that development proposals should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.

6.7.2 Policy T2 of the London Plan also states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. In particular, Policy T2 (D) states that:

“Development proposals should:

- 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance;
- 2) reduce the dominance of vehicles on London’s streets whether stationary or moving;
- 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.”

6.7.3 The TfL WebCat Connectivity Assessment Tool is used to assess the connectivity of a site to public transport and determine the site’s public transport accessibility level (PTAL). The possible PTAL values range from 0 to 6, with 0 being the worst and 6 the best.

6.7.4 The majority of the site lies within the zone of public transport accessibility level of 5 with the north-western part of the site achieving a PTAL of 4. These PTALs are at the higher end of the range and are classified as ‘Very Accessible’ and ‘Accessible’ respectively.

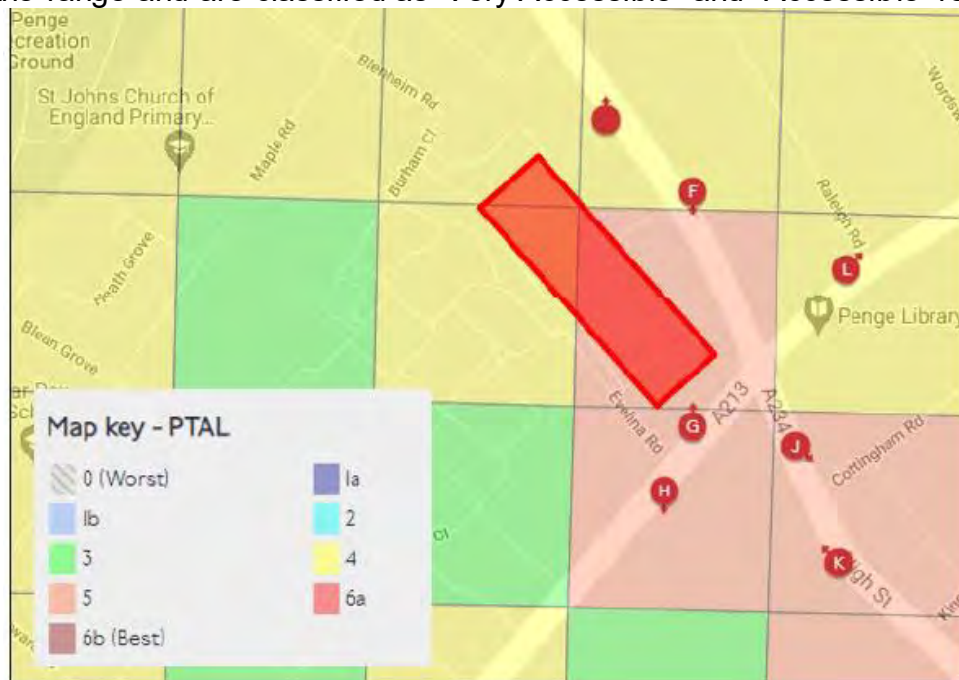


Fig 6.7.1 Map of public transport accessibility level (PTAL) of the site.

6.7.5 Kent House Station is located within 700m (an eight-minute walk) of the site and Penge West Station is within 800m (an 11-minute walk). Kent House Station is served by Southeastern with frequent services to Victoria, Bromley South and Orpington. Penge West Station is served by Southern and London Overground services, with frequent links to London Bridge, Highbury and Islington and West Croydon. Beckenham Road Station is located within 900m (a 12 minute walk of the site). The site is located within 1km of Beckenham Road Tram stop.

6.7.6 The closest bus stop to the site is stop F (High Street / Green Lane) on Penge High Street which provides a southbound service for the 176, 197 and 227 buses towards Beckenham or Norwood Junction. Bus Stop E (High Street/Maple Road) provides access to northbound to buses 176, 197, 227 and 354. Bus stops G and H (Penge / Pawleyne Arms) along Croydon Road provide a northbound and southbound service respectively towards Beckenham, Lower Sydenham or Sydenham. These bus stops are served by buses 75, 176, 197, 356, 358 and N3.

Proposed Site Vehicular Access – Acceptable

6.7.7 Two vehicle access points are proposed to serve the proposed development. An internal vehicle access road (Arpley Mews) leading into the site from Burham Close with a turning head at its north-eastern end (adjacent to Arpley Square). This access route would form a shared surface route with the footway flush with the carriageway (although a demarcated footway would be provided along both sides) and would provide access for:

- delivery/service vehicles serving Blocks A/B/C/F;
- drivers wishing to access four proposed residential accessible spaces;
- drivers accessing the podium car park;
- High Street properties which will retain vehicle access through the service yard.
- Evelina Road will be retained and will provide vehicle access for the following:
 - Delivery and servicing vehicles serving the residential and commercial uses in Block D/E within the Proposed Development.
 - A two-way vehicle access route running through the southern side of Block D/E to ensure access is retained to the rear of the 132-156 High Street properties. This will be gated.
 - The two existing pay-by-phone bays on the eastern side of Evelina Road.
 - The six existing on-street parking bays on the western side of Evelina Road serving the adjacent residential properties.
- Cars accessing the existing Clarion Housing Estate car park at the north western end of Evelina Road.
- Four accessible residential car parking spaces associated with the proposed development.
- Maintaining access for delivery/servicing vehicles (including refuse vehicles) accessing the existing flats along the western side of Evelina Road.

6.7.8 A minor extension would be required to the northern end of Evelina Road to enable delivery/servicing vehicles serving the Proposed Development to turn around at the northern end of Evelina Road, using the existing Clarion Housing Estate car park entrance. The Highways Officer has been consulted and raised no objections. These arrangements would be subject to S278 agreements.

Car Parking – Acceptable

Existing Traffic Situation

6.7.9 A total of 4 sets of traffic surveys were conducted and discussed in the submitted Transport Assessment (TA) by Steer. They were:

- Site access point entry and exit vehicle counts
- Multi-storey car park occupancy surveys
- Interview Surveys with users of the Blenheim Shopping Centre Car Park
- On-street parking surveys

Site access point entry and exit vehicle counts

6.7.10 Site access point entry and exit vehicle counts on Thursday 24 March and Saturday 26 March 2022 (07:00 -19:00), at the following locations:

- Burham Close northern service yard access point (entrance and exit)
- Multi-storey car park entrance at Burham Close
- Multi-storey car park exit at Evelina Road.
- Evelina Road southern service yard access point (entrance and exit)
- Service road serving 132-154 High Street properties from eastern side of southern service yard.

6.7.11 Based on the total number of vehicles entering and existing Blenheim Shopping Centre, including the service yards, the site generates 69 two-way vehicle trips in the AM peak, 179 two-way vehicles trips in the PM peak and 1,640 two-way vehicle trips daily.

6.7.12 Within the total 1,640 vehicles going in and coming out from the application site, only 477 2-way trips were identified going in/ out from the shopping centre car park. 41% of these trips were motorcycles/ mopeds using the service yard accessed from Burham Close.

Multi-storey car park occupancy surveys

6.7.13 Parking occupancy surveys were taken place within the northern service yard, southern service yard and multi-storey car park on Thursday 24 March and Saturday 26 March 2022 (07:00 -19:00).

6.7.14 It is noted that the overall capacity of the multi-storey car park during the surveys was 88 parking spaces for two-day surveys as Levels 4, 5 and 6 of the car park have been permanently closed. The car park experienced low levels of occupancy on both days, with a maximum of 41 vehicles parked (47% occupancy) on the Thursday from 12:00 – 12:30 and 47 vehicles parked (53% occupancy) on Saturday from 12:30 – 13:00.

Multi-storey car park interview survey results

6.7.15 Carpark interview surveys were undertaken within the Blenheim Centre multi-storey car park to establish the main trip purpose of visitors parking at the shopping centre and how many of these were associated with the shopping centre or wider town centre uses. It should be noted that the car park is a private car park for Blenheim Shopping Centre only, with a maximum three-hour parking restriction for customers.

6.7.16 The survey shows that during the peak parking occupation numbers:

- On Thursday, of the total 41 vehicles parked in the multi-storey car park, only 11 of these are users who just visit the Blenheim Shopping Centre.
- On Saturday, of the total 47 vehicles parked in the multi-storey car park, only 17 of these are users who just visit the Blenheim Shopping Centre.

6.7.17 Whilst it is noted that the total vehicles counted on both days (41 and 47 vehicles) have exceeded the proposed parking provision in this application (24 parking spaces proposed), the surveys show that only 11 and 17 of the overall visitors on each day respectively solely visited Blenheim Shopping centre with most of the visitors parking at the Blenheim Shopping Centre car park for linked trips during the survey periods.

On-street parking stress surveys

6.7.18 Overnight on-street parking stress surveys were conducted around the site. In the transport assessment, a 200m-wide area which includes a total of 61 on-street parking spaces was identified for this parking count carried out on two weekdays (04:30-05:30) Wednesday 23 and Thursday 24 March 2022.

6.7.19 In regard to the commercial on-street parking surveys, a 500m-wide area (a total of 1,296 on-street parking spaces) were included in this survey which was carried out on weekdays Wednesday 23, Thursday 24 March and Saturday 26 March 2022.

Residential overnight parking stress survey (200m radius)

6.7.20 The overnight parking survey results show that when the residential parking demand must be getting close to the maximum, the existing parking stress level within 200m of the site was 67%, i.e. well below the 85% threshold when issues may arise.

6.7.21 However, it is noted that parking stress on Wednesday evening (from 20:00 to 22:00) has exceeded 100% with the highest level of 113% observed from 20:00 – 21:00. On Thursday morning (10:00 – 11:00), afternoon (14:00 – 15:00) and evening (18:00 – 23:00), the parking stress has exceeded 100%, with levels over 120% from 19:00 – 21:00. According to the applicants, this high-level parking stress is most likely due to be to visits to other town centre land uses such a commercial, retail and leisure.

Commercial on-street parking stress survey (500m radius)

6.7.22 The TA demonstrates that the daytime parking stress levels within 500m of the site are below the Council's 85% threshold. On Wednesday 23 March the highest parking level was 1,072 of the 1,296 spaces being occupied, a parking stress level of 83%. On Thursday 24 March the highest occupancy was 1,058 out of 1,296 spaces, a parking stress level of 82% from 13:00 – 14:00. Parking stress levels were slightly lower on Saturday 26 March compared to the weekdays with the highest occupancy being 1,033 out of 1,296 spaces (80% stress) from 13:00 – 14:00 and from 20:00 – 21:00.

6.7.23 It is noted the following roads have exceed the parking stress level of 85%:

- Blenheim Road (capacity of 6 spaces) - parking stress levels exceeded the 85% threshold at times on all three days.
- Burham Close (capacity of 9 spaces) - parking stress levels were below capacity on Wednesday 23 March but exceeded the threshold at times on Thursday 24 March and Saturday 26 March.
- Evelina Road (capacity of 16 spaces) - parking stress levels exceeded the 85% threshold at times on all three days.

Proposed Car Parking Provision

Blenheim Shopping Centre Commercial Parking

6.7.24 Table 10.5 of London Plan indicates that the maximum retail parking standards for “all areas of PTAL 5-6” should be car-free. The proposal includes the re-provision of a total of 24 public car parking spaces within a dedicated parking podium car park at ground floor in Block B/C.

6.7.25 The submitted plan shows that the proposed podium car park accessed via Burham Road and located at ground level within Block B/C would accommodate 24 car parking spaces. 2 of the spaces within the car park are proposed to be accessible spaces, with 3 electric vehicle charging spaces also provided. 2 of the electric vehicle charging spaces would also be car club bays. Table 6.7.1 summaries the net reduction of both parking and loading spaces within the application site.

Scenario	Location	No. Parking/ Loading Spaces
Existing Site	Multi-storey car park active spaces (Levels 1-3 = 88 spaces, closed levels 4-6 include an additional 130 spaces)	88
	Northern Service Yard (Blenheim Shopping Centre plus adjacent High Street parking/ loading facilities)	45*
	Southern Service Yard	9
	Evelina Road unmarked parking spaces adjacent to multi-storey car park exit ramp.	7
	Total	149
Proposed Development	Residential accessible parking spaces (3% of total units at outset)	8
	Burham Close Podium Car Park (Relocation of 7 Evelina Road spaces and additional 17 spaces for wider town centre uses)	24
	Retained parking spaces associated with adjacent High Street uses.	16*
	Proposed Development Arpley Mews loading bays (1 x 12m long loading bay and 1 x 8m long loading bay north of Block B/C)	2
	Proposed Development Evelina Road loading bay (12m long)	1
	Total	51
Net Change		-98

Table 6.7.1 The net reduction of both parking and loading spaces within the application site.

6.7.26 It is noted that the proposed car parking provision would not technically comply with London Plan Policy which advocates car-free development, however as the proposed commercial parking provision has been significantly reduced, compared to the existing multi-storey car park (88 parking spaces), it is considered that this would be acceptable in this instance. Officers are also mindful that the commercial on-street parking stress is very close to the Council's parking stress threshold (85%). Again, given that the overall commercial floorspace provision would be reduced, it is expected that the proposal would not make parking stress any worse.

Residential Blue Badge Parking

6.7.27 The proposed residential development would be car free due to the scheme's PTAL 5 rating, with the exception of accessible car parking spaces.

6.7.28 Eight accessible car parking spaces for 3% of the residential dwellings would be provided on-site as per the London Plan. These spaces would be provided from the outset upon completion of the development with four spaces provided along the eastern side of the Burham Close access route and four spaces provided on Evelina Road.

6.7.29 In line with the London Plan, 20% of the residential parking spaces would be equipped with active charging infrastructure at the outset whilst the remaining spaces will be equipped with passive charging infrastructure.

6.7.30 The London Plan also requires an additional 7% of the total residential units to be provided with accessible spaces post occupation if there is demand in the future. This would equate to a theoretical requirement for a further 18 spaces which could not be accommodated within the public realm due to the constrained nature of the site and the severe adverse impact it would have on the proposed pedestrian/ circulation space and landscaping in the public realm. In the Transport Assessment, it is suggested that some proposed parking spaces

could be converted into these additional blue badge spaces. However, it would be subject to post on-site parking survey and car parking management plan.

6.7.31 Overall, whilst the surveys show that the existing parking stress remains below the Council's parking stress threshold, it is expected that the development, without proper mitigation measures, could add additional pressure on the nearby residential on-street parking. Therefore, as discussed in the Transport Assessment, it is envisaged that the existing Controlled Parking Zones (CPZ) may need to be extended and the future occupiers/residents should not be allowed to apply for any on-street parking permits. These measures would be secured by S106 and an appropriate condition.

Cycle parking - Acceptable

6.7.32 Policy T5 of the London Plan states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should also demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people. It states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. The cycle parking spaces should be "well-located – convenient, accessible, as close as possible to the destination, and preferably sheltered."

6.7.33 There would be a total of 22 long stay cycle parking and 82 short stay for the commercial element of the scheme. A total 12 spaces would be re-provided in Arpley Square/ Empire Square. For residential cycle parking, there would be a total of 414 (long stay) and 10 short stay. It is considered that the proposed cycle parking provision would comply with London Plan and Bromley Local Plan policies and the locations would be subject to planning conditions.

Sustainable Transport Hub – Acceptable

6.7.34 A key sustainability feature within the proposed development is the provision of a Sustainable Transport Hub. This would be located in Block A and would be accessible to both future occupiers and the residents from the surrounding area. The hub could potentially include:

- Bike repair unit;
- Additional cycle parking spaces including Brompton lockers;
- Secure lockers for cycling clothing accessories;
- Changing facilities and toilets;
- A bike cleaning area with pressure hose and drainage;
- A bike workshop;
- Vending machines containing bike parts (inner tubes etc.);
- Water fountains to fill water bottles; and
- Future capacity for e-scooters.

Transport Improvements - Acceptable

Pedestrian Network

6.7.35 The scheme creates enhanced public realm and permeability within the site by providing pedestrian routes between the High Street, Evelina Road and Burham Close. This includes enhancing the public realm within Empire Square and the extension of this route further westwards, passing between Blocks B/C and D/E, to provide a direct pedestrian connection to Evelina Road and enhanced public realm and pedestrian routes to the west of Block B/C providing a link through to Burham Close.

6.7.36 The public realm would also be enhanced within Arpley Square to provide a more direct connection into the site. This would connect to Arpley Mews, a shared surface access route (include demarcated footways along both sides) that passes through the site to connect with Burham Close. The public realm along Evelina Road would also be enhanced. Fig 6.7.2 shows all these routes within the site.

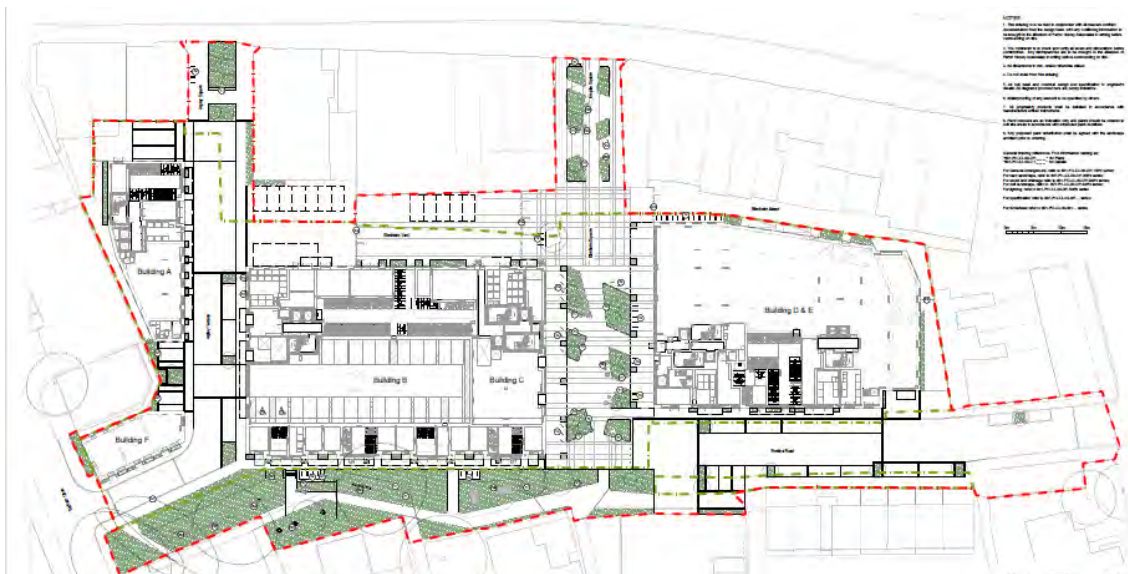


Fig 6.7.2 Proposed Public Realm Enhancements.

6.7.37 Pedestrian access control railings would be provided in the following two locations to restrict pedestrian access:

- At either end of Blenheim Yard (the servicing yard to the east of Block B/C) - This would include gates at either end but would only permit access to authorised pedestrians requiring access to the rear of the High Street properties, or cyclists accessing the Block B/C cycle store. The latter would be directed to use the gate at the southern end adjacent to Empire Square, to ensure they are kept away from the main servicing bay area and vehicle turning head immediately west of Arpley Square.
- At the northern end of Block D/E - This would include a gate to only allow authorised pedestrians requiring access to the rear of the High Street properties to pass through.

6.7.38 Cyclists would be able to access the site using any of the above access points and internal routes.

Moped Bay Relocation – Acceptable

6.7.39 Two potential options have been identified for providing a formalised 10m long moped parking bay on the High Street outside McDonald's. TfL has been consulted and the final location would be secured by S278 agreements.

Delivery/ Servicing - Acceptable

6.7.40 The application is supported by a Delivery and Servicing Strategy prepared by Steer. It is proposed to retain vehicle access and parking spaces to the rear of the following High Street properties as per existing for parking/loading/unloading goods. The following three additional new servicing bays would be provided for the proposed development to serve the residential and commercial uses:

- Two servicing bays at the northern end of the Proposed Development accessed via Arpley Mews from Burham Close comprising:

- One large 12m x 4m loading bay to the northwest of Block B/C directly adjacent to the building. This can be used by vehicles up to 10m rigid lorries and a 10.3m LBB refuse vehicle.
- One 8m x 2.5m loading bay to the north of Block B/C capable of accommodating vehicles up to a c. 7m sprinter van.
- One 18.6m x 2.7m large servicing bay will be provided on Evelina Road, to serve the Proposed Development residential and commercial uses. This could be used by one larger c 10m rigid lorry or a 10.3m LBB refuse vehicle on their own, or two smaller 7.5T van vehicles at the same time.

6.7.41 The report forecasts that the future delivery and servicing trip generation of the proposed development is circa 86 per day and demonstrates how these can be sufficiently accommodated without detriment to the local highway network.

6.7.42 A toolkit of measures is proposed to be taken forward as the DSP evolves over time in order to encourage sustainable freight movements to / from the Site and to reduce unnecessary servicing and delivery trips, particularly during peak times. The building management company would be responsible for creating a delivery schedule once the tenants have occupied the various land uses, and targets will be developed following occupation.

6.8 Green infrastructure and Natural Environment

6.8.1 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.

6.8.2 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.

6.8.3 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.

6.8.4 The latest amendments impacting the landscaping strategy are summarised below:

- Addition of new, south facing roof garden to level 04 of Block D/E;
- Improved residential access through Blenheim Yard with clear demarcation and improved lighting;
- Landscaping on Evelina Road to accommodate Iceland's servicing requirements;
- Revisions to the Urban Greening Factor (UGF) calculations to account for the additional roof garden and general updates to layout of green roofs.

Trees, Landscaping and Urban Greening - Acceptable

6.8.5 An Arboricultural Survey and Impact Assessment prepared by Greengage submitted with the application provides an assessment of the arboricultural value of the trees within the site based on their current quality. The assessment also provides a number of recommendations

to ensure those trees retained as part of the proposed development are appropriately protected during construction.

- 6.8.5 The assessment identifies that at present, the site accommodates several urban trees, including a medium and five small. A line of mature London Planes is also present to the south of the site. As part of the proposal a single Category U tree (T7), being a stump of a common lime, is to be removed. No additional trees would be removed as part of the updated scheme and the retained trees would be protected throughout construction by employing the measures described in the Arboricultural Method Statement which would be secured by condition in any permission. While it is noted that objections were received on the grounds of the loss of mature plane trees, the submission demonstrates that these would be retained. The "Landscape Strategy 3.0" referenced in one of the objections shows an Urban Greening Factor diagram to support the UGF site calculations for the proposal.
- 6.8.6 The GLA Stage 1 response stated that the applicant should provide a review of the urban greening and UGF score, as at 0.35 it was below the predominantly residential development target of 0.4 set by Policy G5 of the London Plan. GLA officers were of the view that whilst there were many positive design features embedded in the scheme, the applicant should review the urban greening proposed, seeking to improve the quality or quantity, to increase the application's UGF. Should the target score cannot be achieved, the applicant should set out robust justification. The Stage 1 response also requested that the applicant states the number of trees to be proposed within the scheme and to confirm that no trees are to be removed as part of the updated landscape proposals to determine compliance with Policy G7 of the London Plan.
- 6.8.7 With the amended proposal the UGF score remains at 0.35, hence still technically below the policy target. The applicant put forward the following arguments to justify the shortfall:
- the proposed development is a mixed-use proposal with a large quantum of non-residential uses at ground floor, the UGF score between the 0.3 target score prescribed for commercial and 0.4 target score required for residential is therefore considered acceptable;
 - the development has the opportunity to include green walls in the form of climbers on various elements of the building; however, these have been removed at the request of the GLA in line with the latest fire regulations. The score of 0.35 is shown without the green walls which would increase the UGF to between 0.37 and 0.38;
 - there could be further opportunities for greening, however this would be at the expense of the useability and future maintenance of the public spaces;
 - the site area also includes existing areas such as the yard at the back of Colman House and the mews to back of commercial and residential units to the east. The potential for greening in these areas are limited due to requirements to maintain shared vehicular access, parking spaces, fire and refuse servicing as well as pedestrian links.
- 6.8.8 The proposed landscape strategy provides a variety of soft landscape and greening interventions. At ground level, there is a variety of planting proposed including seasonal, biodiverse vegetation, areas of meadow or tall grass and trees in planters. In the pocket park, the planting would provide screening from the road as well as creating pockets for play. In the square, the planting would be more formal with groups of planting helping to create a microclimate and establish comfortable seating pockets. At the podium level, the proposals would provide a woodland feel and character. A variety of intensive and extensive green roofs are also proposed to soften and bring greenness to the top of the buildings.
- 6.8.9 The proposed landscape strategy involves planting of 50 new trees on the ground floor and 73 trees on the two podium gardens. Whilst the introduction of new planting is supported, officers acknowledge that the new trees would take minimum 30 years to mature and that majority of the new trees proposed would not be native. Should permission be granted, a

condition should be imposed securing a detailed landscaping plan with revised planting schedule including native species.

6.8.10 On the whole, the landscaping proposals are considered to contribute positively to the overall scheme design with the introduction of greening, biodiversity enhancements and improved pedestrian routes connecting the High Street with the wider surrounding areas.

Biodiversity and Protected Species - Acceptable

6.8.11 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.

6.8.12 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.”

6.8.13 Preliminary Ecological Assessment by Greengage submitted in support of the application confirms that there are no statutory sites of European or National statutory designations within 2km of the site, however, 2 Local Nature Reserves (LNRs) are present comprising Dacres Wood, located 2km north and South Norwood Country Park located 1.3km south. The site does not sit within any Site of Special Scientific Interest (SSSI) Risk Zones. There are 12 non-statutory Sites of Importance for Nature Conservation (SINCs) within 2km of the site boundary, the closest being Betts Park approximately 890m southwest of the site.

6.8.14 The site inspections undertaken on 11th November 2021 and 11th May 2022 confirmed that habitats on site consist predominantly of hardstanding which is used as a service yard and pedestrian walkway, and a shopping centre building with areas of modified grassland, scattered urban trees and a line of mature London Plane trees also present. Invasive species of Buddleia were also recorded growing adjacent to the car park. The surveys undertaken confirmed that the habitats within the site boundary had potential, albeit low, to support bats (roosting, commuting and foraging) and nesting birds.

Bats

6.8.15 The site survey identified the existing building to have ‘low’ potential to support foraging, commuting and roosting bats, however there was a limited potential for bats to roost under the roof tiles of the building. Nonetheless, given the records of bats species within the surrounding area (2km of the site) and the legal protection afforded to bats, a single emergence survey was undertaken on the existing building on the 26 July 2022 to establish the relative importance of the site for local bat populations and to identify the presence/likely absence of roosting bats.

6.8.16 An objection was received based on the grounds of the survey undertaken being ‘*casual and superficial, inadequate and unacceptable, and not conforming to UK law*’ and stating that ‘*a full survey is required to determine what species are present*’.

6.8.17 The overall ecological value of the site and the presence/likely absence of other notable and legally protected species are reported in the Preliminary Ecological Appraisal prepared by Greengage based on the desk top review as well as on-site walkover surveys. The Bat Survey report by Greengage Environmental Ltd (Ref. 551893mc29Jul22FV3) advises that the bat emergence survey was undertaken in accordance with the Bat Conservation Trust (2016)

Bat Surveys for Professional Ecologists: Good Practice Guidelines and the Bat Workers Manual (2004) by a qualified ecologist. The survey was carried out following the guidance in the 3rd addition of the guidance which was the relevant guidance at the time. The weather was warm and clear, and the survey commenced 30 minutes before sunset and continued for 2 hours after the sunset. Two locations on the frontage facing Evelina Road were surveyed. Officers are satisfied that there are no known or significant limitations to the bat survey undertaken. The survey was conducted at a suitable time of year and in generally suitable weather conditions.

6.8.18 The bat emergency survey confirmed the likely absence of roosting bats in the building. Additionally, no foraging or commuting activity from bats was recorded on site at the time of the survey. Although no mitigation actions are required given the result of the survey, measures to enhance the site for both roosting and foraging bats are recommended and would be secured via condition. As the guidance has been updated in 2023 which has changed the survey requirements and bearing in mind that bat surveys are typically valid for one to two years a pre-commencement repeat survey would be required if more than 3 years pass before the site clearance is commenced (from July 2022). Additionally, a condition requiring a precautionary approach to the removal of the ridge tiles of the existing building would also be imposed in any consent.

6.8.19 These measures include the use of bat sensitive lighting regime following guidance from The Institute of Lighting Professionals and Bat Conservation Trust (including measures to limit additional light spill, such as the use of directional, downward facing and shielded lights with low-UV warm-white LED bulbs, curfew controls with movement sensors where possible), provision of six integrated bat boxes into the fabric of the new building, suitable for summer roosting, as well as wildlife-friendly landscaping to enhance the site as foraging and commuting resource.

Birds

6.8.20 The site may support a range of common and widespread bird species and habitats of value including branches and crevices of trees and buildings. The surrounding residential green spaces provide good foraging opportunities due to the range of habitats available. The site therefore has a low potential to support breeding birds.

6.8.21 Nesting birds are protected from disturbance, and it is therefore recommended that demolition and any site clearance of suitable vegetation is undertaken outside of the bird nesting season or, if clearance is required within this period, after an ecologist has confirmed the absence of nesting birds. This requirement will be added to any consent granted.

6.8.22 Compensatory planting should focus on the provision of winterberry producing species as well as species with dense shrubby growth within which birds may construct nests. Bird boxes should be provisioned within the development including swift boxes and sparrow terraces. One bird nest site should be provided per 1000m² of floor space for commercial development and one nest site for every two residential flats. This requirement is included in the recommended biodiversity enhancement condition.

Other Protected Species

6.8.23 The site offers no suitable habitats for badgers, hedgehogs, great crested newt or reptiles. With this in mind, the site is therefore considered to have negligible potential to support these species.

6.8.24 The site may support a range of common invertebrate species within habitats of value including trees. The floral diversity of the habitats on site is poor and the extent of these

habitats is limited, with preferable habitats in the surrounding landscape. The site is therefore considered unlikely to support the rarer invertebrates meaning that overall the site is classified as being of negligible potential to notable/priority invertebrate species such as stag beetle or Jersey tiger moth. Other common invertebrate species may be attracted to the invasive species of buddleia and light sources on site.

Biodiversity Enhancements

6.8.25 The ecological enhancements measures specified in the submission include the following:

- provision of invertebrate habitat features such as bee posts/bricks, habitat panels a stag beetle logs, insect bug hotels and rope coils;
- provision of bird (including swift boxes and sparrow terraces);
- provision of bat sensitive lighting and 6 bat boxes;
- provision of permanent hedgehog houses;
- provision of a biodiverse living roof on new flat roof buildings with a variety of substrates and habitat types including wildflowers for pollinators. micro-pools an invertebrate features;
- removal of invasive species; and
- removal of vegetation outside of the nesting bird season.

6.8.26 Officers recommend that Landscape Ecological Management Plan (LEMP) and biodiversity enhancement conditions are imposed on any planning consent for the redevelopment of the site requesting further details of biodiversity enhancement measures along with details of a long-term site management and monitoring plan for the biodiversity enhancements and landscaping management at the site.

Biodiversity Net Gain

6.8.27 The Biodiversity Net Gain Update submitted as part of the revised proposal states that the Biodiversity Net Gain for the development would be 2652.50%. Although this has reduced from the original scheme due to a change in methodology and based on the updated landscape proposals, it is still a high Biodiversity Net Gain, well above and beyond the statutory minimum 10% requirement and the trading rules continue to be satisfied. As such, the proposed development would be compliant with Policy G6 of the London Plan.

6.9 Energy and Sustainability

Minimising Greenhouse Gas Emissions - Acceptable

6.9.1 The London Plan Policy S12 '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 Policies 123 and 124 of the 2019 Bromley Local Plan are consistent with the strategic aims of the London Plan energy policies.
- 6.9.6 The proposed development meets Building Regulations compliance through Be Lean energy efficiency alone, with further reductions made through Be Clean and Be Green installations of a Communal Heat Network and PV panels.
- 6.9.7 The development would achieve a total regulated CO2 saving of 76% for the residential units therefore exceeding the benchmark, and 12% for the non-residential units, falling short of the target.
- 6.9.8 It is acknowledged in the accompanying GLA note issued with the GLA Energy Assessment Guidance (2022) that non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35 per cent improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments.
- 6.9.9 The proposed development achieves a total regulated CO2 saving of 73% which exceeds the 35% minimum set out in the London Plan. Therefore, although not technically fully policy compliant, the proposal would achieve and exceed the minimum London Plan Policy SI2 carbon reductions *across the site as a whole*. The carbon shortfall in regulated carbon emissions to achieve zero carbon would be made up of a cash-in-lieu payment of £176,047 to be secured in the s106 Agreement.

Whole Life Carbon and Circular Economy

- 6.9.10 London Plan Policy SI-2 requires that 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. London Plan Policy SI7 requires such applications to submit a Circular Economy Statement, whilst London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process.
- 6.9.11 The applicant has submitted a Whole life Carbon Assessment and Circular Economy Statement. In line with the GLA recommendation, a post-construction assessment to report on the development's actual WLC emission and a post-completion report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement would be secured by planning conditions.

Overheating

- 6.9.12 London Plan Policy SI 4 states major development should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 6.9.13 Given the findings of the submitted Noise Impact Assessment in respect to the impact of the existing KFC plant there is a concern about the potential for overheating due to the need to comply with noise standards. Officers acknowledge that there is a practical solution using

mechanical ventilation and/ or active cooling but that is clearly at the lower end of the cooling hierarchy and not usually supported. Officers consider it appropriate that a condition is attached to any approval requesting a review of the energy assessment should active cooling be used as any changes to the approach to minimise overheating must calculate the impact on energy use and carbon and therefore a recalculation of the carbon reduction and offsetting payment may be required.

6.10 Environmental Matters

Air Quality - Acceptable

6.10.1 The area falls within Bromley's Air Quality Management Area. 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.

6.10.2 The application is supported by an Air Quality Assessment prepared by Phlorum. The report reaches the following conclusions with respect to construction phase impacts, operational phase impacts and achieving air quality neutrality.

Construction Phase Impacts

6.10.3 The construction phase of the development could give rise to emissions which could cause dust soiling effects on adjacent uses. Following the IAQM guidance, the construction phase of the development can be considered to be High Risk for nuisance dust impacts, Medium Risk for PM10 health effects, and to be Negligible for ecology, in the absence of mitigation.

6.10.4 Following the implementation of the mitigation measures provided in the report, emissions from the construction programme would be reduced and the residual significance of impact for the construction phase is expected to be reduced to Negligible.

Operational Phase Impacts

6.10.5 The proposed development is not expected to generate volumes of traffic in exceedance of the indicative screening thresholds prescribed by the relevant guidance. Therefore, it can be reasonably assumed that the operation of the proposed development would have an insignificant impact on local air quality.

Air Quality Neutral Assessment

6.10.6 The proposed development would generate a total of 198 car trips (AADT), which is comfortably below the travel benchmarks set out within both the 2014 and 2021 air quality neutral guidance. The proposed development's energy strategy comprises the use of ASHPs, and as such, the proposed development is not expected to generate building emissions of NOx or PM10. Therefore, the proposed development is expected to achieve air quality neutrality with regard to both transport and building emissions.

6.10.7 As such, the proposed development is expected to comply with all relevant local and national air quality policy. Air quality should not, therefore, pose any significant obstacles to the planning process. The mitigation measures noted above would be secured through planning conditions.

Contaminated Land - Acceptable

6.10.8 Phase 1 and Phase 2 Site Appraisals were undertaken by Patrick Parsons. The findings of the two reports are noted below. None of the findings indicate major concerns in terms of contamination or sensitive uses such as residential being located on site subject to mitigation where necessary.

- The site has been classified as being moderate to high risk with regards to unexploded ordnance (UXO). The following were the findings from the detailed UXO risk assessment. Following this assessment the north eastern and central sections of the site have been given a medium risk and the north western and southern sections of the site a low risk.
- The bedrock geology beneath the site is recorded to comprise clay of the London Clay Formation. Superficial Head Deposits are present on site.
- The site is not recorded to be within a Coal Authority Coal Mining Reporting Area. There is 1no. records of BritPits within 250m of the site associated with a surface clay pit. There is 1no. other surface working located within 250m of the site which is a brickfield 166m southwest of the site. There are 13no. records of historical underground workings on site associated tunnels the nearest located at 717m northwest. There are 3no. 103 non coal mining records within 1000m of the site. All relate to chalk mining with the closest being 545m to the east of the site.
- The site is not within a Radon Affected Area, as less than 1% of properties are above the action level; radon protection measures are therefore not required for new properties.
- The bedrock geology of the London Clay Formation is recorded to be an unproductive aquifer. The superficial head deposits are recorded as a Secondary (Undifferentiated) Aquifer. The site is not recorded to be within any Source Protection Zone.
- There are 3no. records of groundwater abstractions within 2000m of the site. The nearest record is located 1119m southeast and is related to general use at Beckenham Road, Bromley and is currently active. There are no surface water features within 250m radius from the site. • There are no EA/NRW recorded historical landfill sites within 500m of the site. There are 13no. waste exemptions records within 500m of the site, the nearest is recorded 202m east of the site and relates to recovery of scrap metals.
- There are 83 no. recorded historical industrial land uses within 500m of the site. The nearest is located 18m east of the site and is recorded as a police station.
- There are 7no. recorded historical tanks within 500m of the site, the nearest being 78m northeast of the site and is an unspecified tank.
- There are 14no. records of Licensed industrial activities (Part A (1)) within 500m of the site, the nearest three are related two dry cleaning and are located at 48m southeast, 105m east and 119 northwest. Other two close records are located at 167m southwest and 176m southwest relating to unloading of petrol into storage at service station.
- There are 23no. records of recent industrial land uses, the nearest is located on site relating to repair and servicing electrical equipment. Other records within the 250m zone include curtains and blinds, pets and vermin control, electrical features, vehicle components, distribution and haulage, textiles, fabrics, silks and machinery, scrap metal merchants, vehicle servicing and cleaning, and water pumping stations.
- There is 3no. record of current or recent petrol station within 500m, the nearest is located at 172m southwest and its operational status is open. The other two records are located 391 -southeast and 486m northwest.
- Based on given history of the site and the BGS borehole records it is considered that there is likely to be a significant depth of made ground on-site. Based on historic development on-site and immediate surrounding area the potential for contamination is likely to be encountered on site. 104
- There is a multistorey car park on site, therefore the potential contaminants associated with vehicles are likely to be encountered. The specific contaminants of concern are

likely to include heavy metals, polyaromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPHs) and asbestos.

6.10.9 The Phase 2 report notes that the chemical analysis has identified exceedance of PAHs within WS06 when compared against the relevant Patrick Parsons GACs for residential end-use without plant uptake. As such, it is considered that soils at the site do pose a risk to human health; however, due to the construction of the buildings over the source there will be no pathway linking it to end users. It is therefore considered that the risk to end-users is negligible and no specific remedial measures are required.

6.10.10 Based on the results of the first ground gas monitoring visit it is considered that the site does not require ground gas precautions, however confirmed recommendations will not be provided until the completion of the ground gas monitoring programme. A final gas risk assessment will be compiled on completion of the four monitoring visits.

6.10.11 In terms of controlled waters, a source of contamination has been identified within WS06 at 0.40m begl. However, due to the locality of the exceedances being within the footprint of a proposed structure the source material will most likely be removed during the construction phase breaking the source-pathway-receptor linkage with regard to risk to controlled waters, it is also noted that the site is not within an area with a sensitive receptor and significant thicknesses of low permeability natural soils underlay the elevated made ground soils limiting the pathway. It is therefore considered that the risk to controlled waters is negligible and no remedial measures are required for the proposed development.

6.10.12 The above findings were considered as acceptable by the Environment Agency and the Council's Environmental Health Team and no objections were received subject to the impositions of appropriate conditions.

Lighting - Acceptable

6.10.13 The lighting should be 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 and will not exceed 2 lux at any habitable window, meeting the illuminated limits on surrounding premises for E3 Medium Brightness zone respectively.

6.10.14 Lighting plans and calculations by ESD were provided with the application, the aims and principles of which are acceptable. A lighting condition would be required to ensure that lighting in the new development is at an appropriate level so as to minimise impact on amenity whilst ensuring safe and secure places and minimising disturbance to wildlife.

Noise and Vibration – Acceptable

6.10.15 Given the proposed use of the site, no undue noise and disturbance issues would likely to arise. Should planning permission be granted, appropriate conditions would be attached regulating the hours of operation of the commercial units within the proposal.

6.10.16 Demolition and construction activities are likely to cause some additional noise and disturbance, traffic generation and dust. Should permission be granted, a number of conditions would be imposed to minimise these impacts.

6.10.17 The Environmental Health Officers confirm that subject to the above matters being secured through appropriate conditions in the event of planning permission being granted no objections are raised to the proposal.

6.11 Flood Risk and Drainage - Acceptable

- 6.11.1 The NPPF states that major development should incorporate sustainable drainage systems which should take account of advice from the lead flood authority; have appropriate proposed minimum operational standards; have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and where possible, provide multifunctional benefits. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. London Plan Policy SI13 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, in line with the drainage hierarchy.
- 6.11.2 Policy 116 (Sustainable Urban Drainage System) of the LBB Local Plan states 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.
- 6.11.3 The application is supported by a Flood Risk Assessment and Drainage Strategy prepared by Patrick Parsons. The FRA identifies that the site is within Flood Zone 1 and has a very low risk of fluvial flooding. All other sources of flooding have been investigated and shown to be of minimal risk. The proposed development is concluded as being appropriate and sustainable in the terms as set out in the NPPF.
- 6.11.4 In terms of drainage, the SuDS hierarchy has been followed and SuDS features have been incorporated into the drainage strategy including green roofs, permeable paving and attenuation tanks. The underlying bedrock geology classification is London Clay formation which results in there being no infiltration allowable in the drainage strategy.
- 6.11.5 The surface water network is a network that incorporates the SuDS features mentioned above and works via gravity in conduits and manholes. There is one surface water rising main of 17m, with a surface water pump modelled at 1.8l/s. There is one outfall for the site which is Thames Water manhole 5164 in the proposed Empire 106 Square. The flow is controlled via a Hydro Brake Vortex flow control that is placed in manhole SW-13; the proposed flow rate is 1.9l/s which is the Greenfield runoff rate Q_{bar} . The foul water network runs via gravity and there is one outfall which is in the proposed Empire Square which connects into the 900mm diameter existing foul water sewer.
- 6.11.6 The Council's drainage officer and Thames Water raised no objections to the proposal as the proposed development is considered to be at a very low risk of flooding from all sources, and the drainage strategy has been designed in accordance with the London Plan drainage hierarchy and shown to be acceptable.

7. Other Issues

Equalities Impact

- 7.1 Section 149 of the Equality Act (2010) which sets a Public Sector Equality Duty (PSED) came into force in April 2011 and requires the Council to consider the equality impacts on all protected groups when exercising its functions.
- 7.2 In the case of planning, equalities considerations are factored into the planning process at various stages. The first stage relates to the adoption of planning policies (national, strategic and local) and any relevant supplementary guidance. A further assessment of equalities

impacts on protected groups is necessary for development proposals which may have equality impacts on the protected groups.

- 7.3 With regards to this application, all planning policies in the London Plan and Bromley Local Plan and National Planning Policy Framework (NPPF) which have been referenced where relevant in this report have been considered with regards to equalities impacts through the statutory adoption processes, and in accordance with the Equality Act 2010 and Council's PSED. Therefore, the adopted planning framework which encompasses all planning policies which are relevant in the officers' assessment of the application are considered to acknowledge the various needs of protected equality groups, in accordance with the Equality Act 2010 and the Council's PSED.
- 7.4 It is also necessary to have due regard to the public sector equality duty, which sets out the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations between people who share a protected characteristic and people who do not share it.
- 7.5 The protected characteristics to which the Public Sector Equality Duty (PSED) applies include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, sexual orientation, religion or belief and sex.
- 7.6 The proposed development has been designed to take account of the specific needs of disabled people. It would incorporate suitable means of access for all people from the entrance points, sufficiently wide routes and access ways as well as independent horizontal and vertical movement that is convenient and ensures that people can make use of all relevant facilities. The scheme would deliver 18 M4(3)(2)(a) wheelchair adaptable units and 5 social rented M4(3)(2)(b) wheelchair accessible dwellings, i.e. designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users and those whose mobility may become impaired with age. All remaining units would achieve M4(2) standards.
- 7.7 The proposal would generate various benefits for the local economy and offer new opportunities to access employment in the renewal area. Although the exact number of jobs generated by the proposed development would depend on the final land uses occupying the site, as stated in the Socio-economic Assessment by Tetra Tech, it is estimated that the commercial floorspace would generate between 88 to 173 additional Full Time Employees (FTE)³. Additional job opportunities would be generated through the operational management of the development. It is further estimated that the construction of the proposed development could create 66 permanent FTE construction jobs for the construction period (2.5 years) and further 62 induced and indirect jobs (i.e. related and supporting activity in the supply chain) in the local area. This would have a positive impact on economically inactive people and those unemployed which are those in the categories of age, sex and disability, as well as indirectly on children (workless households).
- 7.8 The provision of housing, including affordable homes, would have a long-term beneficial impact, addressing the Council's affordable housing delivery shortages and the existing rates of deprivation which identified significant barriers to housing availability. Some of the new homes are likely to be occupied by existing local residents buying first homes, local residents trading up (or down), or, in the case of affordable units, existing residents on Housing Association' or Council waiting lists. This would have a positive impact on people with lower household income ranges and therefore those in the categories of age, pregnancy and maternity, race, and sex (women) who are less economically active.

³ Calculation undertaken in accordance with the Homes and Communities Agency Employment Density Guidance 2015.

- 7.9 The overall regeneration of the site with the provision of public realm, enhanced pedestrian routes, active frontages and balanced mix of land uses would improve safety and of security by increasing activity on-site and levels of natural surveillance throughout the day and in the evenings. The impact of the proposed development on crime and anti-social behaviour is therefore expected to have varying degrees of beneficial impact on the most vulnerable people including age, disability, sex, pregnancy, race, religion/belief and sexual orientation.
- 7.10 The proposal is expected to give rise to negative impacts in relation to demolition and construction, such as increased vehicular movements, noise and air quality aspects. These impacts would have the potential to affect the following equality groups; age, disability, pregnancy and maternity. These impacts are however considered short term and would depend on the measures that would be set out in the Construction Management Plan and other relevant conditions aimed to minimise disruption and mitigate the likely impacts.
- 7.11 In conclusion, it is considered that LB Bromley has had due regard to section 149 of the Equality Act 2010 in its consideration of this application and resulting recommendations to the Development Control Committee.

Community Infrastructure and Community Infrastructure Levy

- 7.12 Objections have been received on the grounds of Insufficient provision of local infrastructure, such as schools and doctor surgeries. The Socio-economic Assessment by Tetra Tech demonstrates that in terms of the impact on the provision of educational facilities, based on the Department for Education data on capacity and the “Schools Pupils and their Characteristics 2022” data there is sufficient surplus capacity within the existing area to accommodate both additional primary and secondary aged pupils.
- 7.13 The assessment of the existing healthcare facilities provision within the 2km radius of the site shows that nearest 2 NHS GP practices currently operate over the recommended capacity, sufficient availability for new patients remains in the other 6 surgeries within the catchment area. ⁴
- 7.14 Notwithstanding the above, under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), the proposal would be liable for the Mayoral CIL (subject to applicable affordable housing relief). The CIL regulations require CIL to be spent towards “the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area”.
- 7.15 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. Proposals involving social, or affordable, housing (conditions apply) can apply for relief from CIL for the social housing part of the development. This is set out in Regulation 49 of the CIL Regulations 2010 (as amended).

S106 Legal Agreement

- 7.16 The National Planning Policy Framework (NPPF) states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It further states that where obligations are being sought

⁴ Figure recommended by the General Medical Council (GMC) and used by the Department of Health (DoH) and Clinical Commissioning Groups (CCGs) is 1,800 people per GP.

or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. The NPPF also sets out that planning obligations should only be secured when they meet the following three tests:

- (a) Necessary to make the development acceptable
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development.

7.17 Policy 125 of the Local Plan 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.

7.18 Officers have identified a number of planning obligations which are required to mitigate the impacts of this development, the reasons for which have been set out in this report, should permission be granted. The development, as proposed, would necessitate the following obligations to which the applicant has agreed to in principle, unless otherwise indicated:

- Affordable Housing 35% (37 Social Rented and 36 Shared Ownership)
- Early-stage affordable housing review mechanism
- Carbon off-set payment-in-lieu £176,047
- Signage and wayfinding (Legible London) £22,000
- Healthy Streets TBC
- Considered construction (monitoring and compliance) £25,000
- Contributions towards consultation on extending nearby CPZs and future implementation of CPZs £25,000
- 2 years free car club membership per dwelling
- Twenty free car club driving hours per dwelling in the first year
- Retention of original architects TBC
- Monitoring fees £500 per head of term.

7.19 Officers consider that these obligations 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.

8. Conclusion and Planning Balance

8.1 This application is for a re development of the existing shopping centre with a mixed-use development providing up to 230 dwellings and up to 2,714sqm of commercial floorspace together with associated communal amenity space and play space, cycle and car parking, and refuse storage.

8.2 The NPPF (2019) sets out in paragraph 11 a presumption in favour of sustainable development. 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'. In terms of decision-making, where a plan is out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies within the NPPF taken as a whole.

8.3 The proposed development would deliver 230 dwellings on this highly accessible, under-utilised previously developed land located at the heart of an Area of Renewal and Regeneration. The proposal would make a substantial contribution to the housing supply in the Borough and would help to address the Council's acute housing delivery shortages.

- 8.4 The proposal would substantially improve the retail environment of Penge as a District Centre and would address the current lack of activation between the Blenheim Centre and the High Street with enhanced commercial frontages. The proposal would result in the provision of 2,714 sqm of flexible commercial uses which would provide job opportunities, services, facilities and economic activity. Additional residents residing within the town centre would also help to stimulate the local economy.
- 8.5 Although the removal of the current shopping centre building which detracts from the conservation area is supported, the proposed development would result in 'less than substantial harm' to a range of designated heritage assets under the NPPF definition.
- 8.6 Officers have concerns in regard to the height and massing of some of the blocks and their townscape impact, however the quantum and density of the scheme is considered to be generally acceptable, reflecting the need to optimise the development potential of all available and under-utilised brownfield sites, particularly in highly accessible locations such as this. Officers consider the layout of the proposal to be an appropriate response to the site and its surroundings and support the proposed detailed design and material palette.
- 8.7 Both the layout of the development and the arrangement of the individual residential units would constitute the optimum design in response to the constraints of the site and access requirements. The proposed residential accommodation would comply with the minimum standards in terms of size and overall would provide an adequate level of internal and external amenity.
- 8.8 Whilst the impacts of the proposed development on the neighbouring amenity would be noticeable and would result in some isolated BRE transgressions and restricted spacial relationships, these would be reflective of the context and constraints of the site with several self-obstructed properties in close proximity. The inherent site factors are considered to place a potentially unfair burden on the site, as in such circumstances any meaningful increase in massing and density would inevitably result in changes to the level of amenities currently enjoyed by adjoining occupiers, therefore a degree of flexibility needs to be applied to the locations with a high expectation of development taking place, such as renewal areas and town centres.
- 8.9 Officers are mindful of the 35% affordable housing covenant which was included within the purchase contract, and which affects the quantum of development required to achieve an acceptable viability position.
- 8.10 The provision of new public realm within the site and improvements to the surroundings, including landscaping and biodiversity net gain would create a more secure, sociable environment for residents and the wider community.
- 8.11 Adequate sustainability measures would be incorporated achieving a reduction in combined domestic and non-domestic carbon emissions (CO₂) by a minimum 73% and meeting BREEAM Excellent for non-residential floorspace. Environmental matters such as air quality, contamination, noise, light pollution and drainage, would be subject to appropriate conditions in any approval.
- 8.12 The proposed development would provide a sustainable car free scheme and sustainable transport options and, with a suit of mitigation measures secured to address the potential increase in car parking stress, is not considered to result in an unacceptable impact on the surrounding highway network.
- 8.13 In considering the benefits of the scheme, officers attach very substantial weight to the significant contribution that the proposed 230 housing units would make in the context of the

Councils' inability to currently demonstrate a five-year housing land supply, and the recent failure of the Housing Delivery Test. The development proposal would offer new opportunities to access housing in the renewal area, with a quantum of dwellings providing almost 30% of the Council's annual housing target as set out in the London Plan.

- 8.14 Whilst it could be argued that a policy compliant provision of Affordable Housing should not be attributed any significant additional weight, officers are mindful of the poor Affordable Housing delivery in Bromley in recent years. Affordable delivery figures released from the GLA Pipeline Website have highlighted the Council has been unable to deliver significant numbers of affordable homes in the past two years. In 2021/22, a total of 63 affordable homes and in 2022/23, a total of 73 affordable units were approved respectively. The application scheme would contribute a total of 37 social rented and 36 shared ownership units, which would be equivalent to the annual approvals of affordable homes in Bromley in the last two years. This is considered to be a significant material factor in the light of the acute affordable housing need which attracts further very significant weight in support of the proposal.
- 8.15 Significant weight is apportioned to the positive long-term benefits the proposal would have in supporting the vitality and viability of the District Town Centre, the local employment and economy. The proposal would generate significantly greater pedestrian visits and would provide opportunities to reduce crime and anti-social behaviour with greater natural surveillance. The regeneration benefits of the scheme would contribute to the wider regeneration of Penge.
- 8.16 Officers attach substantial weight to the proposed public realm improvements and significant biodiversity gain.
- 8.17 As discussed, the proposed development would result in 'less than substantial harm' to a range of designated heritage assets under the NPPF definition. In accordance with paragraph 208 of the NPPF where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 8.18 In considering the impact of the proposed development on the significance of designated heritage assets, officers have afforded great weight to the asset's conservation. However, in this instance, the public benefits of the proposal (as discussed in the preceding sections of this report) are considered to outweigh the less than substantial harm which has been identified.
- 8.19 Officers have also highlighted a number of areas where the proposed development would transgress from planning policy requirements, including the visual impact of the proposal on the wider townscape and the immediate low-rise suburban context, as well as the impact on the amenities of occupiers of some of the adjacent residential sites. However, 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, the considerations advanced in support of the proposal can be seen as sufficient to clearly outweigh the adverse impacts, when assessed against the policies in the Framework taken as a whole. Accordingly, the application is recommended for permission, subject to planning conditions, the prior completion of a S106 legal agreement and any direction from the Mayor of London.
- 8.20 This planning application has been processed and assessed with due regard to the Public Sector Equality Duty and, as discussed in the preceding section, officers consider that these proposals would not conflict with the Duty.

9. **Recommendation: Permission, subject to the following conditions, the prior completion of a S106 legal agreement and any direction from the Mayor of London**

SUMMARY OF CONDITIONS AND INFORMATIVES

- **Time limit of 3 years**
- **Compliance with approved drawings**

PRE-COMMENCEMENT

- **Slab Levels**
- **Construction and Environmental Management Plan**
- **Contamination**
- **Archaeology (WSI)**
- **Tree Protection**
- **Piling Method Statement**
- **Lighting Scheme**
- **Circular Economy Statement**
- **Construction Phase Noise and Vibration Assessment**
- **Digital Connectivity Infrastructure**
- **Biodiversity Enhancements**
- **Additional Bat Survey**

ABOVE-GROUND WORKS

- **S278 Works**
- **Landscaping Scheme**
- **Landscape Ecological Management Plan**
- **Architectural Details/ External Material Samples**
- **Hard Landscaping including Boundary Treatment**
- **Pocket Park**
- **Children Play Space**
- **Privacy Screens**
- **Noise Mitigation**
- **Refuse Storage and Waste Management Plan**
- **Cycle Storage**
- **Secure by Design**
- **Method of Ventilation/Cooling**

PRE-OCCUPATION

- **Surface Water Capacity**
- **Foul Water Capacity**
- **Post-Construction Whole Life-Cycle Carbon Assessment**
- **Verification report**
- **Travel Plan**
- **Parking Management Plan**
- **Delivery and Servicing Plan**
- **Moped Bay Relocation**
- **Kitchen Extract System**
- **Water Infrastructure Phasing Plan (100th Dwelling)**

COMPLIANCE

- **Any Unexpected Contamination**
- **Rights of Way**
- **No Parking Permits**
- **Air Quality**
- **Retention of Retail Floorspace**
- **Hours of operation (Commercial Uses)**
- **Delivery Hours (Commercial Uses)**
- **Wheelchair units**
- **Car Parking**
- **Electric Vehicle Charging Spaces**
- **Low NOx Boilers**
- **Non-road Mobile Machinery**
- **Drainage**
- **No piling**
- **Water Usage**
- **Fire Safety Measures**
- **Wind Mitigation**
- **PD Removal**
- **Ecological Assessment**
- **Precautionary Approach to the Removal of the Ridge Tiles**

APPENDIX A.10 1 CALVERLY CLOSE PROPOSED SCHEME DSO REPORT



**Calverley Close Estate
Beckenham, BR3 1UL**

Daylight, Sunlight
and Overshadowing
Assessment

May 2022



Report presented by **HTA Design LLP**
Status **Issued**
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Author **HF**
Checked **ELD**
Approved by **RB**

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Executive Summary

HTA Sustainable Futures have prepared this report for the full planning application of the regeneration of Calverley Close, Beckenham, BR3 1UH.

The scheme provides 275 new homes (179 Affordable Homes and 96 Private Homes).

The proposed scheme has been carefully designed to provide future occupants with adequate daylight and sunlight levels throughout the year, with particular attention to not impacting negatively on the natural daylight received by the neighbouring buildings. The main scope of the Daylight and Sunlight study is to assess the performance of both the proposed development and the existing surrounding properties in terms of daylight and sunlight availability.

The analysis has been carried out in accordance with BRE's guide 'Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice', P J Littlefair (2011). According to the BRE guide:

'...the advice given here is not mandatory and this document should not be seen as an instrument of planning policy. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values' such as a dense urban environment.'

The Daylight and Sunlight assessment was carried out using the following checks in accordance with the BRE Guide (2011):

Daylight Assessment:

- **Existing properties:**
 - Vertical Sky Component (VSC)
 - Daylight Distribution (DD)
- **Proposed dwellings:**
 - Average Daylight Factor (ADF), and
 - View of the Sky (NSL)
 - Room depth

Sunlight Assessment:

- **Existing properties and proposed dwellings:**
 - 25 degree angular check
 - Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH)
- **Existing and proposed external spaces:**
 - Sunlight on the ground and Overshadowing.

Daylight

Impact on the existing buildings

The daylight analysis considered all the **surrounding buildings** with main windows facing the development. The following properties were assessed against the daylight criteria:

- Conifer House, 44 Southend Road
- Walnut Court, 33 Southend Road
- 39-59a Southend Road
- 61 Southend Road
- 63 Southend Road
- 65 Southend Road

Initial analyses were conducted to assess the likely impact that the existing properties surrounding the site would receive from the new buildings. As the BRE guide explains, it is important to apply the BRE targets sensibly and flexibly, with careful consideration of the specific site context.

The National Planning Policy Framework (July 2021) states that when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making an efficient use of a site. The NPPF asks local planning authorities to consider whether satisfactory living conditions are achieved within future developments.

In the case of the Proposed Development, a mid-rise scheme is proposed in front of a low to mid-rise urban configuration. Preliminary studies were conducted to provide the design team with feedback in relation to the impact caused by the proposed massing on the existing buildings. The massing was adjusted according to the initial studies to ensure that adequate daylight and sunlight access is provided to the properties adjacent to the scheme. For some properties, we managed to obtain drawings and information of the internal layout of the existing units. The model of these units was, therefore, built following the drawings available. When this information was not available, educated assumptions were made to assess the Daylight Distribution (DD) of the existing homes.

The results of the assessment show all of the existing habitable rooms would achieve DD values in line with the BRE recommendations.

The numerical results of the Vertical Sky Component (VSC) analysis indicate that all the surrounding properties meet or exceed the BRE recommendations.

In addition, all the analysed rooms meet or exceed the criteria for Daylight Distribution (DD).

Overall the proposed buildings minimise the impact on the existing surrounding properties. The detailed results of the analysis can be found in the main report and in the appendices.

Assessment of the proposed development

Daylight levels of the **proposed units** have been tested. The Average Daylight Factor (ADF) and the No-Sky Line (NSL) tests have been carried out to assess the daylight availability within each habitable room of the proposed scheme.

Overall, the results show good levels of daylight within the proposed scheme. In particular, 80% of the proposed rooms meet or exceed the recommended targets for the Average Daylight Factor. In addition to good levels of daylight ingress, good sky visibility can be seen in 80% of the proposed rooms, as they meet or exceed the BRE recommendation for No-Sky Line (NSL). These results are deemed good for a scheme of this size and nature.

Sunlight

Impact on the existing buildings

None of the **existing surrounding properties** have south-facing windows directly facing the Proposed Development. Therefore, the impact of the proposed scheme on the existing surrounding properties for sunlight is deemed acceptable.

Assessment of the proposed development

To assess the **sunlight provision within the scheme** the BRE guide recommends that only living rooms that face within 90° due south should be tested.

The results show that 97% of the tested windows achieve adequate sunlight through the year. All the tested windows also achieve positive results in the winter period.

Sunlight on the ground - Overshadowing

Impact on the existing buildings

The sun-on-the ground analysis has been carried out for the **existing amenity spaces** surrounding the site. The results show that all the amenity spaces meet the BRE recommendations.

An additional test was also conducted on 21 June to assess the sunlight conditions in the summer period when the spaces are more likely to be used during summer. All spaces would achieve adequate sunlight conditions and no significant reductions were found for this period.

Assessment of the proposed development

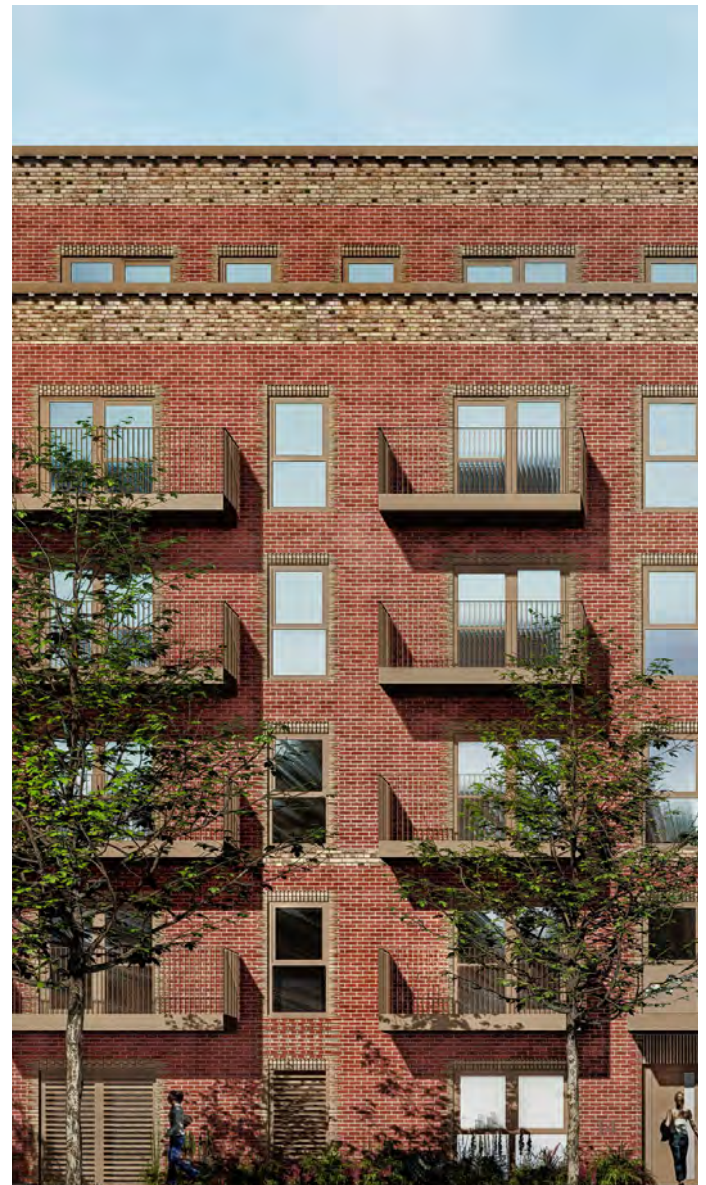
The study of the external amenity areas includes the **new external spaces** which are part of the Proposed Development.

The results of the sun-on-the-ground analysis indicate that the proposed external spaces comply with the requirements described in the BRE guidelines with the exception of one amenity space in Phase 2 (communal space of Blocks 2a and 2b), which achieves values below the recommended target. There is only one communal area in phase 2 falling below the target. The public amenity space in Phase 2 compensates for the loss of

sunlight achieved in the courtyard with results showing full compliance with the minimum requirements.

As per the study of the existing external spaces, the sun-on-the-ground tests were conducted on 21 March, as required by the BRE, and on 21 June.

Overall, we can conclude that the proposed development will offer good levels of daylight to future occupants and good levels of sunlight to the living spaces and to the external amenity area throughout the year. In terms of impact on the surrounding properties, the proposed development will not cause unacceptable harm to the surrounding residential amenity. The retained daylight and sunlight levels are appropriate to the urban context and the overall results are, therefore, considered acceptable against the relevant planning policies and guidance.



1.0 Introduction

HTA Sustainable Futures have been instructed to prepare a Daylight and Sunlight study to assess the impact of the proposed development at Calverley Close, in the London Borough of Bromley, on the existing surrounding properties and open spaces in terms of daylight and sunlight availability. Daylight and sunlight in main living areas, i.e. kitchens, living rooms and bedrooms, of the proposed development as well as sunlight provision in outdoor amenity spaces have been also assessed.

Daylight and sunlight calculations have been carried out in accordance with BRE's 'Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice' (2011) by P J Littlefair, which is generally accepted as good practice by planning authorities.

The BRE Guide gives advice on site layout to achieve provision of daylight and sunlight both within buildings and in the open spaces between them. It aims to aid designers in considering the relationship between new and existing buildings to ensure that each retains the potential to achieve good daylight and sunlight levels.

The BRE guide should be used flexibly when dealing with urban sites and extensions to existing buildings. The Guide states in the introduction:

"The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings."

Section 4 of this report briefly describes the BRE methodology and the design standards. Sections 6, 7 and 8 provide a summary of the outcome of the analysis.



2.0 Site description

Calverley Close is positioned along Southend Road in Beckenham, Bromley, a borough to the south-east of Greater London.

The site is north-south oriented, bound by Southend Road to the west, Beckenham Place Park to the east, a forested pedestrian park link to the north, and an apartment building (that fronts onto Southend Road) to the south.

The site has good proximity to several local recreational amenities, most importantly Beckenham Place Park and Grade II* listed Mansion.

Shopping amenities are located in central Beckenham, which is approximately a 15-minute walk to the south. A variety of rail stations with access to central London are within walking distance of the site.

The existing site contains several residential blocks. Of the 204 properties, 40 within Warner House comprise of specialist accommodation. Heights range from 3 to 4 storeys as mostly flatted accommodation along with some three-storey townhouses. The site area is 2.4 hectares.

The existing buildings create a strong frontage to Southend Road, however, a large setback, mature trees and contoured landscape minimises, and at some points, obscures the built form. A single access from Southend Road provides the main pedestrian and vehicular access to the site. This access point provides a central junction within the site linking to three cul-de-sac routes to service the northern, southern and eastern residential blocks.

Buildings to the back of the site are adjacent to the tree-lined boundary with Beckenham Place Park.

The site's topography varies by approximately 3.5 metres across the site. The layout and distribution of housing does not best utilise the site or satisfy the current housing needs of the residents. The quality of housing could be improved in line with contemporary ways of living and ever-improving building regulations, space standards, accessibility and sustainability.

A range of building heights surrounds the site, predominantly to the west, varying from one to ten storeys. The ten-storey elements are the high-rise residential buildings opposite the site within the Porchester Mead Development, behind Southend Road. The surrounding one storey heights are predominantly garages illustrating the use of cars around and within the site.



3.0 Planning policy

National Planning Policy Framework (2021)

The National Planning Policy Framework was revised in July 2019 and paragraph 125, part C states that

[...] local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.

National Planning Practice Guidance

Paragraph 006 of Reference ID: 66-006-20190722 states that

Where a planning application is submitted, local planning authorities will need to consider whether the proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers, as well as assessing whether daylight and sunlight within the development itself will provide satisfactory living conditions for future occupants. [...].

The London Plan (2021)

Policy D6 - Housing quality and standards states that:

The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

Single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and therefore should normally be avoided. Single aspect dwellings that are north facing, contain three or more bedrooms or are exposed to noise levels above which significant adverse effects on health and quality of life occur, should be avoided. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy and daylight, and that the orientation enhances amenity, including views. It must also demonstrate how they will avoid overheating without reliance on energy intensive

mechanical cooling systems.

Policy D9 Tall buildings states that:

Environmental impact

[...] 3) environmental impact

a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

Housing Supplementary Planning Guidance (2016)

The Mayor published a Supplementary Planning Guidance on Housing in March 2016.

The Housing SPG moves away from the rigid application of the national numerical values provided in the BRE Guidance. Paragraph 1.3.45 states that

"an appropriate degree of flexibility needs to be applied when using BRE Guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets.

This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."

Paragraph 1.3.45 states that

"The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm."

Draft SPG 'Good Quality Homes for all Londoners' – The Mayor of London (October 2020)

The Mayor of London has produced a draft SPG which includes the following: - C5.3 Daylight, sunlight and overshadowing - Applying BRE guidelines in relation to neighbouring homes

Decision-makers should recognise that fully optimising housing potential on sites may necessitate standards which depart from those presently experienced, but

which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

Guidelines should be applied sensitively to higher density development, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances, the need to optimise housing capacity, and the scope for the character and form of an area to change over time.

The BRE guidelines apply nationwide, and the default numerical targets provided are purely advisory. These are based on a uniform, 25-degree development angle (vertical obstruction angle) typical of a low-rise suburban location. This corresponds to the Vertical Sky Component (VSC) target of 27 per cent cited in the guidelines. Typical development angles in a city or central urban location are considerably higher. In Central London, development angles of 40 degree or 50 degree are common and can, if well planned, deliver successful schemes. A uniform development angle of 40 degree corresponds to a VSC target of 18 per cent, and 50 degree gives a VSC target of 13 per cent. Such daylight levels have been accepted in many desirable central areas for well over a century. Module A: Optimising Site Capacity - A Design-led Approach therefore adopts a 50-degree development angle to determine offset distances.

Even with access to good levels of daylight on the outside of a building, it is possible to have low levels of daylight within a building due to design features such as small windows, recessed windows, poor placement of balconies or deep rooms. Therefore, consideration of the retained target VSC should be the principal consideration. Where this is not met in accordance with BRE guidance, it should not be less than 0.8 times its former value (which protects areas that already have low daylight levels).

Less weight should be given to the room-based measures of daylight such as 'no-sky-line' or average daylight factor as these are dependent on the design of the neighbouring property. Except in exceptional circumstances, design features of neighbouring properties (referred to above) should not hamper the development potential of a site.

Applying BRE guidelines in relation to neighbouring homes

It may be possible to mitigate lower external daylight VSC levels by using design features such as larger windows, roof lights and light coloured internal and external surfaces to ensure reasonable internal daylight levels. Therefore, room-based measures of daylight and sunlight are most appropriate for judging the acceptability of a proposed development, as these encourage good daylight design. Appropriate 3D modelling should be used to demonstrate acceptable levels.

The BRE guidelines confirm that the acceptable minimum average daylight factor target value depends on the room use. That is 1 per cent for a bedroom, 1.5 per cent for a living room and 2 per cent for a family kitchen. In cases where one room serves more than one purpose, the minimum ADF should be that for the room type with the higher value. Notwithstanding this, the independent daylight and sunlight review states that in practice, the principal use of rooms designed as a 'living room/ kitchen/dining room' is as a living room. Accordingly, it would be reasonable to apply a target of 1.5 per cent to such rooms.

The need for balconies to be a minimum depth so as to function as usable amenity space, (see C4 Dwelling Space Standards), can have significant bearing on the daylight and sunlight levels reaching nearby windows and rooms. Inevitably, any window or room under a balcony will receive much lower daylight and sunlight levels, although the adjacent balcony space will typically have excellent levels of daylight and sunlight amenity. Given this, the Mayor encourages boroughs to allow the daylight levels on the balcony to contribute to the ADF of the adjacent living space.

Bromley Local Plan 2016-2031 (January 2019)

The Local Plan, adopted in February 2019, includes the following policies in relation to daylight and sunlight availability:

Policy 3

Backland and Garden Land Development

New residential development will only be considered acceptable on backland or garden land if all of the following criteria are met:

c - There is no unacceptable impact on the residential amenity of future or existing occupiers through loss of privacy, sunlight, daylight and disturbance from additional traffic;

Policy 37

General Design of Development

All development proposals, including extensions to existing buildings, will be expected to be of a high standard of design and layout. Developments will be expected to meet all of the following criteria where they are relevant:

d - The relationship with existing buildings should allow for adequate daylight and sunlight to penetrate in and between buildings;

e - 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;

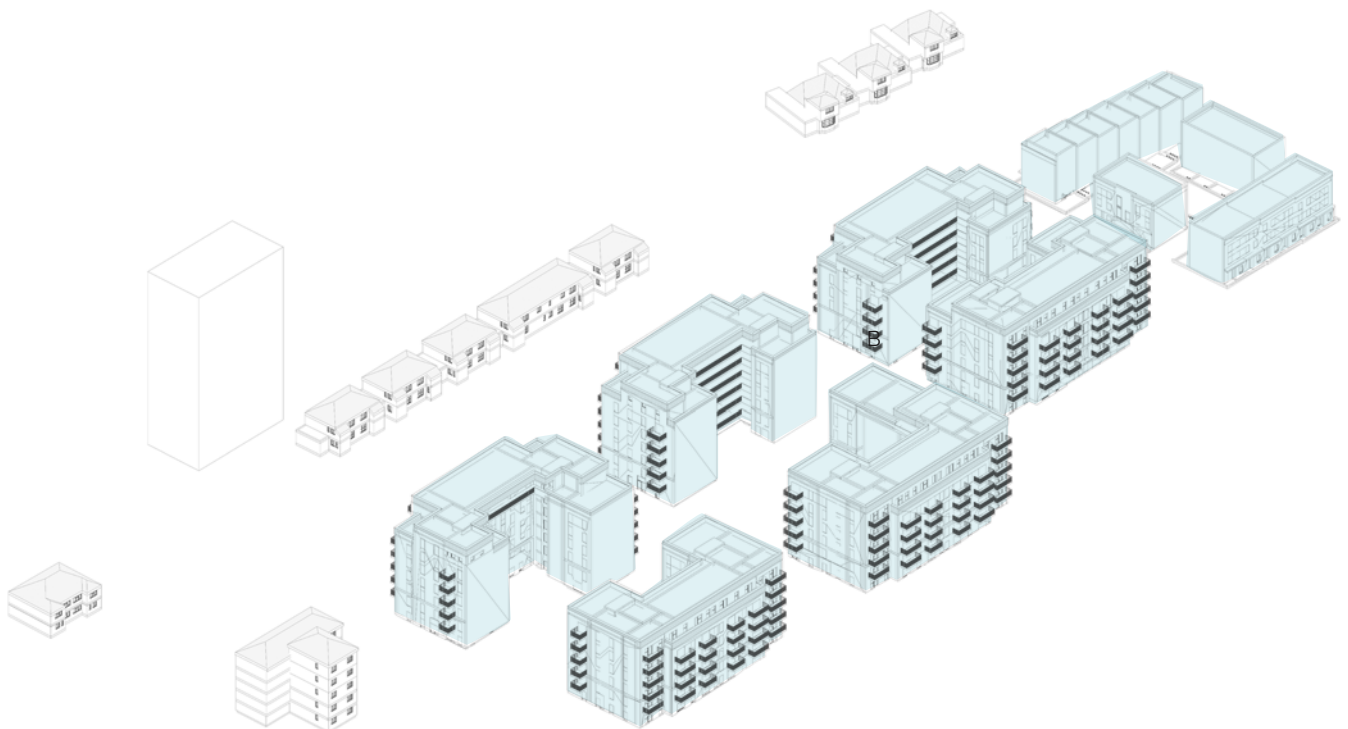


Figure 1. Axonometric view of the development

4.0 Methodology - Assessment criteria

The Daylight and Sunlight Assessment, presented in this report, has been carried out in accordance with the methodology outlined in the Building Research Establishment (BRE) Guide 'Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice' by P J Littlefair (2011).

4.1 Daylight - Impact on existing properties

The design of a new development should safeguard potential for daylight to nearby buildings. Otherwise, obstruction caused by new built sites may make surrounding properties look gloomy and unattractive.

BRE guidelines are intended for use for living areas in adjoining dwellings or main occupied spaces in non domestic buildings where daylight is required. The methodology to assess the impact on daylight access of the properties surrounding the development is as follows:

Angular check

This test should only be used where the proposed development is of a reasonably uniform profile and is directly opposite the existing building. A plane is drawn at 25 degrees from the horizontal at the centre of an existing window. If the new development intersects with this plane, i.e. the obstruction angle is greater than 25°, daylight access of the assessed window may be reduced. A more detailed assessment should be then carried out to calculate the loss of daylight to the existing window.

Buildings that are not directly facing the new development may still experience a change to their lighting condition and therefore the 45-degree approach method should be applied to assess the impact. A horizontal plane should be drawn from the highest point of the proposed development angled at 45 degrees downward. If existing windows fall within the area created by the existing building, proposed development and the angled plane, these should be also included in the assessment.

Vertical Sky Component method (VSC)

The Vertical Sky Component (VSC) quantifies the amount of available daylight, received at a particular window and measured on the outer pane of the window. This is the ratio, expressed as a percentage, of the direct illuminance

falling on a reference point (usually the centre of the window) to the simultaneous horizontal illuminance under an unobstructed sky (overcast sky conditions). The maximum value of VSC for a completed unobstructed vertical window pane is 40%.

In order to maintain good levels of daylight the BRE guidance recommend that the VSC of a window should be 27% or greater. However, the 2011 BRE Handbook makes allowance for different target values in cases where a higher degree of obstruction may be unavoidable such as historic city centres or modern medium and high rise buildings. The guide states that the 27% value is:

"..purely advisory and different targets may be used on the special requirements of the proposed development or its location".

If the VSC is less than the recommended target then further assessment should be carried out to compare existing and proposed daylight levels received by an existing window.

The BRE guide also explains that although the document gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. It is therefore very important to apply the BRE guidance sensibly and flexibly, with careful consideration of the specific site context. Mayoral Decisions have confirmed that alternative targets can be set to suit the urban context of the development, i.e. VSC levels in an urban context which are in excess of 20% can be considered reasonably good and VSC levels in mid-teens can be regarded as acceptable.

Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct sunlight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations without the balcony in place.

Comparison method

The comparison test considers the VSC results of the baseline/existing condition and the VSC results assuming that the new development is in place. The 2011 BRE Handbook states that where the proposed VSC is less than 27%, the comparison with the existing situation should be analysed and if the VSC is less than 0.8 times its former value, occupants of the existing building may notice a reduction in the amount of daylight.

Daylight Distribution

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.

Room Depth Criterion

As one important factor to consider when designing a new home is that reducing the building depth (window wall to window wall) could be helpful for good interior daylight.

The BRE handbook requires a check of the room depth ratio for the overall ADF to demonstrate that the depth of the room is not out of proportion to the width and the window head height to the extent that the distribution of light will be poor.

When a daylit room is lit by windows in one wall only, the guide recommends that the depth of the room should not exceed the limiting value based on the calculation.

4.2 Daylight - New Development

The quality and quantity of daylighting in an interior space depends on two main factors: external environment and internal layout. External environment, e.g. Obstruction from neighbouring buildings or topographical features has an impact on daylight provision whereas internal layout and windows' size affects daylight distribution within a living area.

Section 2.1 and Appendix C of the BRE guide provide several methods for calculating daylight levels within new developments.

According to the BRE guide and BS8206, only main living areas within a dwelling, i.e. Kitchens, living/dining rooms and bedrooms, should be assessed against the criteria provided, as these are occupied for a long period throughout the day and daylighting is essential for carrying out tasks. Therefore, secondary spaces, e.g. Circulation areas, bathrooms and storerooms, are excluded from this study.

Average Daylight Factor

The most effective way to assess quality and quantity of

daylight within a living area is by calculating the Average Daylight Factor (ADF). The ADF, which measures the overall amount of daylight in a space, is the ratio of the average illuminance on the working plane in a room to the illuminance on an unobstructed horizontal surface outdoors, expressed as a percentage.

The ADF takes into account the VSC value, i.e. The amount of daylight received on windows, the size and number of windows, the diffuse visible transmittance of the glazing used, the maintenance factor and the reflectance of the room surfaces. Therefore, it is considered as a more detailed and representative measure of the daylight levels within a living area.

In housing, BS 8206-2 recommends minimum values of ADF of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

Position of the No-Sky Line

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.

The following table summarises the assessment criteria as described in the BRE Guide that should be applied to new developments in order to ensure good daylight levels within the main living areas of residential units.

4.3 Sunlight - Impact of existing properties

The impact of the new development on the sunlight levels received by the neighbouring residential buildings has been carried out in accordance with the BRE Guide.

The methodology is based on guidelines set out in the 2011 BRE Handbook. Only windows facing 90° of due south have been considered in the analysis. The methodology to assess the impact on the sunlight access of the properties surrounding the new development is as follows:

Annual Probable Sunlight Hours

BRE have produced sunlight templates for London, Manchester and Edinburgh indicating the Annual Probable Sunlight Hours (APSH) for these regions. The London template has been selected for this study which has an APSH of 1,486 hours and a Winter Probable Sunlight Hours of 446 hours. The same VSC reference points are used for the calculation of the APSH and WPSH. It should be considered that sunlight is deemed less important in kitchens and bedrooms. The 2011 BRE Handbook states:

"In houses, the main requirement for sunlight is in living rooms, where it is valued at any time of day, but especially in the afternoon".

The 2011 BRE Handbook also states:

"...a south facing window will, in general, receive most sunlight, while a north facing one will receive it only on a handful of occasions. East and west facing windows will receive sunlight only at certain times of day".

According to the BRE guide, for a space to be reasonably sunlit:

- At least one main window wall should face within 90° of due south and
- The centre of at least one window to a main living room should receive 25% of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March. If a room has multiple windows on the same wall or on adjacent walls, the highest value of APSH should be taken. If a room has two windows on opposite walls, the APSH due to each can be added together.

If the available sunlight hours are below the above thresholds then an additional assessment should be carried out.

Comparison method

The comparison test considers the APSH and WPSH results of the baseline condition and the APSH and WPSH results of the Development in place. The BRE guidance say that if the reduction in sunlight between the baseline condition and the future one results in an APSH and WPSH of at least 0.8 times its former value, then it is considered that the sunlight received is adequate.

4.4 Sunlight - New development

Sunlight is valued as it provides dwellings with light and warmth and it also allows for passive heating through solar gains that reduces heating energy consumption. Optimum

arrangement of the site to produce the best orientation (within 90° of due south) and reduce overshadowing should be considered in order to take advantage of solar energy during winter time.

According to BRE Guide, the main requirement for sunlight in housing is in living rooms, whereas in bedrooms and kitchens sunlight is viewed as less important. Therefore for a space to be reasonably sunlit at least one main window wall should face within 90° of due south and the centre of at least one window to a main living room should receive 25% of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March. If a room has multiple windows on the same wall or on adjacent walls, the highest value of APSH should be taken. If a room has two windows on opposite walls, the APSH due to each can be added together.

According to the BRE Guide, at high-density developments it becomes difficult to avoid some dwellings being seriously obstructed or having a poor orientation. Where prolonged access to sunlight is available, measures to avoid overheating and unwanted glare from the sun should be considered.

4.5 Overshadowing - Gardens and open spaces

Existing spaces

The methodology is based on guidelines set out in the 2011 BRE Handbook that states the following:

"The availability of sunlight should be checked for all open spaces where it will be required. This would normally include: private gardens (usually the main back garden of a house), parks and playing fields, children's playgrounds..."

Table 1. Daylight criteria for the assessment of the daylight levels of new buildings

Measure of Interior Daylight	Benchmark	Daylight Criterion
Average Daylight Factor (ADF)	2.0% 1.5% 1.0%	Minimum value of ADF for Kitchens Minimum value of ADF for Living rooms Minimum value of ADF for Bedrooms
Vertical Sky Component (VSC)	27%	Minimum value of VSC
No-Sky View (NSL)	80%	There will be a good distribution of light in the room if at least 80% of the working plane receives direct skylight.
Room Depth Criterion (RDC)	Based on the formula in the Building Research Establishment (BRE) Guide	
Measure of Interior Sunlight	Benchmark	Sunlight Criterion
APSH	25% 5%	Minimum value of annual probable sunlight hours Minimum value of winter probable sunlight hours
Sun on the ground	50%	Minimum area of the amenity space receives two hours of sunlight on 21 March

BRE Guide recommends that for a garden or amenity to appear adequately sunlit throughout the year, at least half of it should receive at least two hours of sunlight on 21 March (Spring Equinox).

The Guide suggests that where large buildings are proposed which may affect a number of amenity spaces it is useful to plot a shadow plan to show the location of shadows at different times of the day on 21st March. Shadow plans for the 21st of March and 21st of June can be found in Appendix B.

The methodology to assess the sunlight impact of the amenity spaces is as follows: sunlight provision is considered adequate if at least 50% of the amenity space receives two hours of sunlight on 21 March. If otherwise, then a comparison between the existing and proposed conditions is required to test whether the amenity space receives at least 80% of sunlight of its former value. If this is the case the BRE guidance states that the loss of sunlight is negligible.

Proposed development

Good site layout planning should be able to provide not only interiors but also spaces between buildings with adequate levels of daylight and sunlight. This will have an important impact on the overall appearance and ambience of a development by providing attractive sunlit views, making outdoor activities more pleasant, encouraging plant growth etc.

BRE Guide recommends that for a garden or amenity to appear adequately sunlit throughout the year, at least half of it should receive at least two hours of sunlight on 21 March.

5.0 Site model

The Daylight/Sunlight analysis was carried out by creating a three-dimensional model of the proposed development and its surroundings (Figure 3).

All the units have been analysed and assessed against the BRE standard. For each unit only kitchens, dining rooms, living rooms and bedrooms were assessed in terms of daylight and sunlight provision.

Floor layouts of the proposed development, shown in Appendix B, highlight those units included in the daylight and sunlight study described in the following sections.

The model was also used to assess the impact on the surrounding buildings in terms of daylight, sunlight and overshadowing.

The calculations were based on the following assumptions:

- The standard CIE (Commission Internationale de L'Eclairage – International Commission on Illumination) overcast sky was used for the daylight analysis
- The working plane was set at 0.85m above the floor as per BRE guidance for dwellings
- Clean, clear double glazing with a low emissivity coating was assumed with diffuse visible transmittance of 0.68.

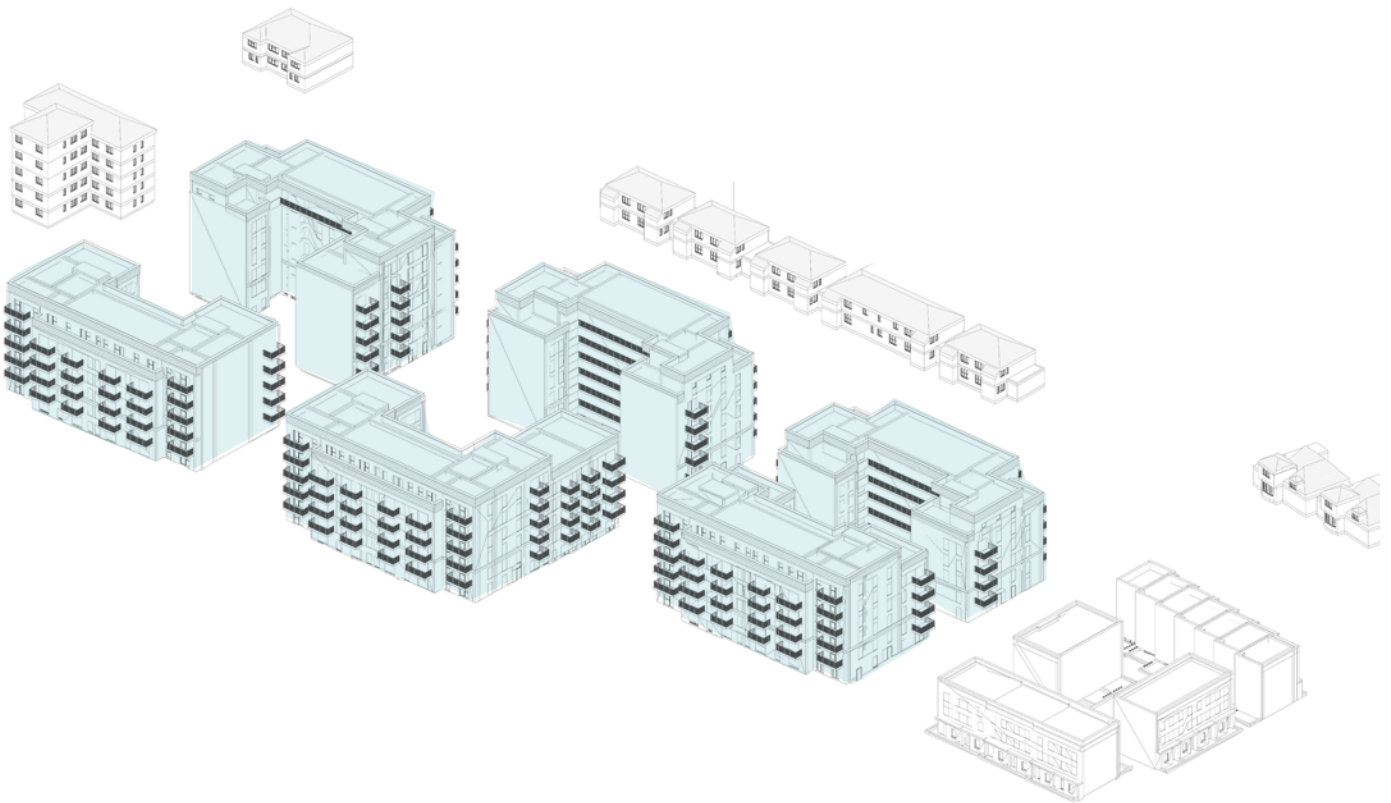


Figure 2. 3D model of the proposed development and its surroundings -Proposed buildings shown in blue

6.0 Daylight assessment

6.1 Impact on existing properties

A daylight analysis has been carried out to assess the impact of the new development on the surrounding existing properties in terms of availability of daylight. Figure 3 shows the location of the existing buildings that surround the proposed development and whose daylight availability may be affected by the new blocks.

Vertical Sky Component (VSC)

The design of a new development should safeguard potential for daylight to nearby buildings. Otherwise, obstruction caused by new built sites may negatively affect neighbouring sites. The Vertical Sky Component (VSC) quantifies the amount of available daylight, received at a particular window and measured on the outer pane of

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%.

As the BRE guide notes, the targets recommended in the guide are purely advisory and different targets may be used based on the special requirements of the proposed development or its location.

The properties analysed in this study are the residential buildings which are located around the site and which might be affected by the Proposed Development. Several initial studies were conducted to assess the likely impact of the proposed massing to the existing properties with the intention of guiding the design team and provide advice



Surrounding residential buildings

Proposed buildings

1: Conifer House, 44 Southend Road

2: Walnut Court, 33 Southend Road

3: 39-59a Southend Road

4: 61 Southend Road

5: 63 Southend Road

6: 65 Southend Road

Figure 3. Site plan with surrounding buildings

on opportunities for reducing the impact while maximising daylight and sunlight availability within the proposed scheme.

Following the review of the preliminary studies, the design was adapted to reduce the impact on the properties. The proposed massing is the result of adjustments which try to reduce the impact on the surrounding properties as much as practical.

The following properties are considered relevant for this development and have been analysed in detail.

- Conifer House, 44 Southend Road
- Walnut Court, 33 Southend Road
- 39-59a Southend Road
- 61 Southend Road
- 63 Southend Road
- 65 Southend Road

The numerical results of the analysis indicate that all the surrounding properties meet or exceed the BRE recommendations for the VSC and NSL values.

An accurate model of the internal layout of the existing properties was prepared for some units based on information obtained from the planning portal. Educated assumptions were made to assess the daylight distribution (DD) within the remaining existing homes. The results of this assessment show all of the existing habitable rooms would achieve DD values in line with the BRE recommendations.

Overall the massing has minimised the impact on the existing surrounding properties with particular attention to the units which are most likely to be affected. The results of the analysis confirm that the existing residential spaces achieve values in line with its context.

Table 2. Daylight Assessment: Impact on the surrounding buildings - VSC and DD

	VSC		NSL	
	Analysed windows	% of windows meeting VSC above 27%	Analysed rooms	% of rooms meeting NSL
Conifer House	55	100%	35	100%
Walnut Court	10	100%	8	100%
39-59a Southend Rd	62	100%	44	100%
61 Southend Road	4	100%	2	100%
63 Southend Road	4	100%	2	100%
65 Southend Road	4	100%	2	100%



Figure 4. 3D view of the model used for the analysis and its surrounding buildings

■ Surrounding residential buildings - relevant for the test ■ Surrounding residential buildings - Irrelevant for the test

6.2 Assessment of the proposed development

The daylight analysis was carried out on the proposed development to ensure good daylight levels according to the BRE guidelines.

Table 3 presents a summary of the results of the daylight analysis, in terms of daylight provision (Average Daylight Factor and No-Sky Line). A total number of 853 rooms were tested against the BRE criteria.

The three-dimensional representation of the proposed buildings was placed in the context of its surrounding buildings. The existing properties have been modelled from survey information, the OS map and site photographs.

The simulation assumptions are based on values from reflectance, transmittance and maintenance factors as specified in BS 8206-2:2008, Annex A. The tables below summarise the factors used in the analysis:

Reflectance values:

Surrounding	0.2
Internal walls (light grey)	0.7
Internal ceiling (white paint)	0.8
Internal floor (light veneer)	0.4

Transmittance values

Double glazing (Low-E)	0.75
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Maintenance factors

Double Low-E (Frames not modelled)	
TV (normal)	0.75
A.3	8
A.4	1
A.5	1
A.6	0.8
TV (Total)	0.55

Initial studies were conducted to guide the design in the initial stages of the design process. A final set of calculations was then performed and the results of the analysis are summarised in this report.

For the final assessment, all the rooms were assessed, as represented in Appendix B. The habitable rooms were assessed for both Average Daylight Factor (ADF) and No-Sky Line (NSL).

The results show that 80% of the habitable spaces meet and, in some instances, exceed the BRE target for daylight (Average Daylight Factor).

The requirement for kitchens and open spaces is higher than the requirement for bedrooms or for separate living rooms. It is, therefore, harder to achieve the minimum target of these rooms in blocks of flats located in urban environments. The numerical results indicate that open spaces which include a living rooms and a kitchen often achieve an ADF value of at least 1.5%. This is the value recommended for living rooms.

Block 1A

Block 1A is located to the north of the site and consists of 6 triplex maisonettes. The houses are all 4 bedroom maisonettes facing south-east and north-west.

The results of the daylight analysis show that 100% of the habitable rooms achieve the ADF and No-Sky Line targets. The results are, therefore, classified as acceptable.

Block 1B

Block 1B is a low-height building fronting block 1D to the north and blocks 2A and 2B to the south. Block 1B includes 3 triplex maisonettes.

The results show that 96% of the habitable spaces meet the minimum target for ADF and 91% of them also meet and exceed the NSL target. There is one kitchen on the ground floor achieving an ADF value of 1.52%. Rooms on the lower floors are more likely to achieve lower daylight availability.

In addition, two Dining rooms on the ground floor achieve NSL value of 69% and 66%. The remaining habitable rooms meet or exceed the minimum criteria. Overall, daylight conditions within the habitable spaces of Block 1B are deemed good and adequate to the suburban context.

Block 1C

Block 1C consists of 7 triplex maisonettes. The results show that 95% of the habitable spaces meet the minimum target for ADF. In addition, 76% of the rooms meet and exceed the NSL target. There is a living room on the first floor and a bedroom on the second floor achieving lower ADF values of 0.95% and 0.86% respectively. Overall, daylight conditions are deemed good.

Block 1D

Building 1D is located to the north of the site and provides 3 bedroom maisonettes. The results of the daylight assessment show that 100% of the rooms meet the BRE recommendations for ADF, and a total of 96% of the spaces meet or exceed the NSL criteria. The overall results of this block are deemed acceptable.

Block 2A

Block 2A provides 2-bedroom and 3-bedroom flat types as well as maisonettes. The results of the daylight analysis show that 83% and 79% of the rooms pass the ADF and NSL targets respectively. There are 18 bedrooms falling below the ADF target. Bedrooms achieving lower ADF values are mainly single aspect rooms obstructed by deck access. However, the daylight availability of the main habitable spaces is generally adequate.

The proposed design balances the daylight availability across the whole block and the reductions in bedrooms facing north-west are limited to 4 bedrooms per floor which are on the central wing of first to fourth floor. All the units achieve adequate daylight availability to the kitchens and living rooms. The overall results are deemed acceptable.

Block 2B

Block 2A provides 1-, 2- and 3-bedroom flat types on the typical floors as well as maisonettes on the ground floor. The results show that 76% of the habitable rooms meet or

exceed the ADF target, while 75% of the rooms meet the NSL criteria. There are only 3 Living/dining rooms and a kitchen on the ground floor falling below the target. Two of the living rooms facing south-east have deck access above them which reduces the daylight availability, while the two other failures on the ground floor are due to the obstructions caused by the adjacent buildings.

There are 22 single aspect bedrooms on the mid-floors and top floor falling below the target which are located below the deck access or the projected roof. Similarly to Block 2A, the reductions in daylight availability are limited to the units located in the central wing on each floor, whereas all of the other units on the mid and top floors achieve daylight levels in line with the BRE criteria. The overall results for this block are deemed acceptable.

Block 3A

Block 3A is located in phase 3 which is in the middle of the site. A total of 142 rooms have been tested and the results show that 73% and 84% of the rooms meet or exceed the ADF and NSL targets respectively.

There are some daylight reductions in 2 kitchens and 4 living/dining rooms on the ground floor. The daylight reductions of the bedrooms on the mid-floors are mainly due to the deck access above them.

Although 6 kitchen/living/dining rooms on the mid-floors fall below the ADF, they exceed the minimum target of 1.5% for living rooms. The reductions to these rooms are mainly caused to the projected balconies above the main windows.

Overall, the results of this block are considered acceptable.

Block 3B

Block 3B is a mid-height building located in phase 3. There are 2 living/dining rooms on the ground floor falling below the ADF target. The two Kitchen/Dining/Living rooms on the first floor meet the target for living room which is at least 1.5%. In some instances, the single aspect bedrooms fall below the ADF criteria. The failures are mainly caused by the deck access or projected balconies.

Block 4A

Block 4A is located to the southern side of the site. This block is fronting Conifer house, 44 Southend Road to the south and Block 4B to north-west.

The results show that 82% of the rooms meet or exceed the ADF target, whereas, a total of 81% achieve NSL criteria.

2 living rooms and a kitchen on the ground floor fall below the ADF criteria. In addition 6 kitchen/dining/living rooms on the mid-floors meet the minimum of 1.5% target for the living rooms. The reductions to these spaces are due to the projected balconies above them.

In some instances, single aspect bedrooms on mid-floors and top floor that are located below the deck access and projected roof, fall below the ADF criteria. Daylight provision for bedroom is, however, less important than for other habitable spaces. The overall daylight provision across the block is good and is deemed acceptable.

Block 4B

Similarly to Block 4A, Block 4B is located on the southern side of the site, fronting Conifer House, and 44 Southend

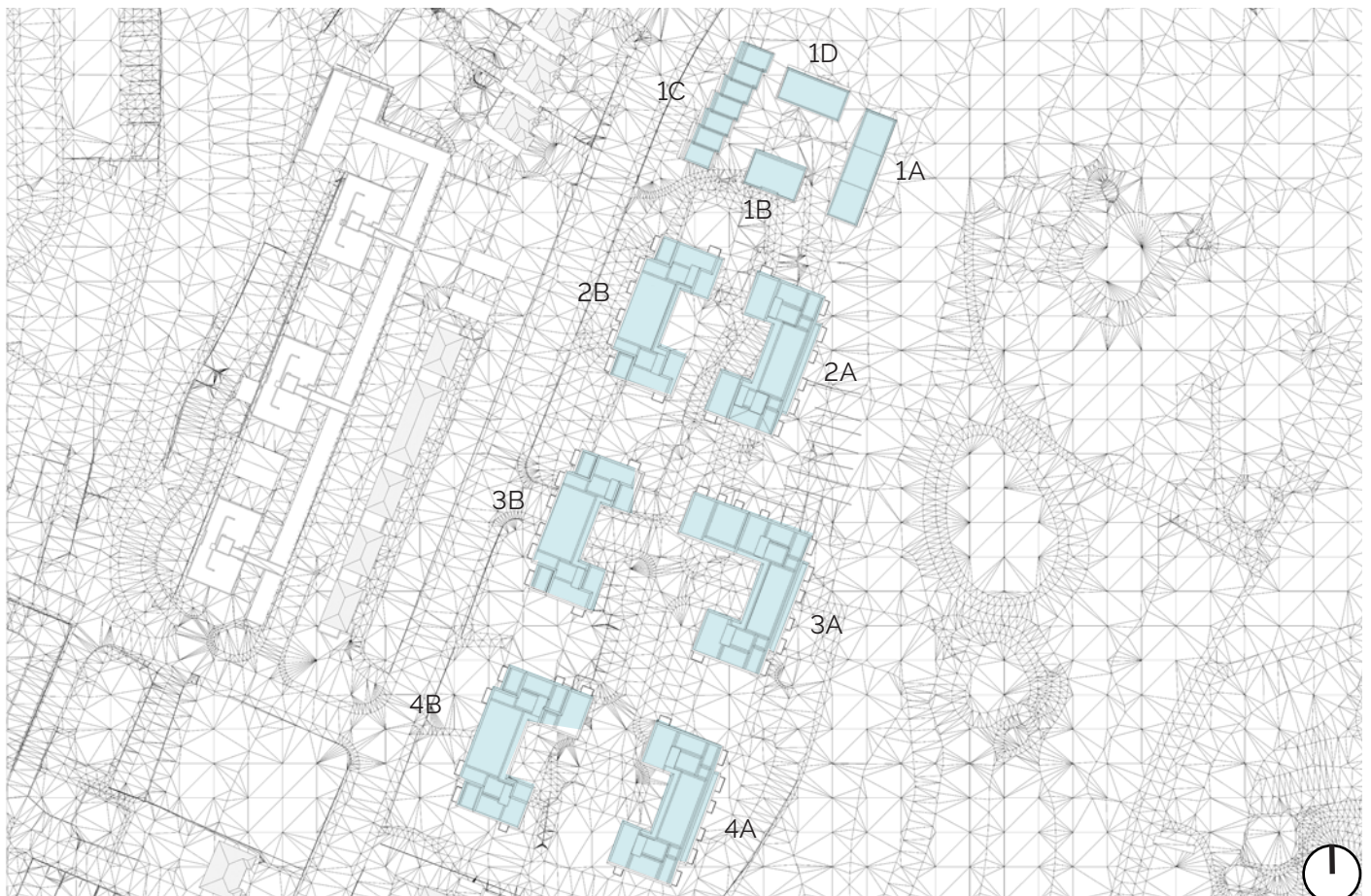


Figure 5. Site plan

Road to the south. 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 with provide further access to daylight and sunlight.

In summary, the daylight results show that a total of 682 (80%) rooms achieve 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. These results are considered to be good for a scheme of this size and nature.

The detailed results and labelled floor plans are shown in Appendix B.

Table 3. Summary results of the Daylight Assessment - Proposed development

	Analysed rooms	Average Daylight Factor		No-Sky Line		Room Depth Criterion	
		No. of rooms meeting the target	Rooms meeting the BRE criteria (%)	No. of rooms meeting the target	Rooms meeting the BRE criteria (%)	No. of rooms meeting the target	Rooms meeting the BRE criteria (%)
Block 1A	36	36	100%	36	100%	36	100%
Block 1B	23	22	96%	21	91%	23	100%
Block 1C	42	40	95%	32	76%	42	100%
Block 1D	23	23	100%	22	96%	23	100%
Block 2A	108	90	83%	85	79%	108	100%
Block 2B	107	81	76%	80	75%	107	100%
Block 3A	142	104	73%	119	84%	142	100%
Block 3B	123	95	77%	97	79%	123	100%
Block 4A	110	90	82%	89	81%	110	100%
Block 4B	139	101	73%	104	75%	139	100%
Total	853	682	80%	685	80%	853	100%

7.0 Sunlight Assessment

7.1 Impact on existing properties

Sunlight is an important issue to consider for the quality of an internal space. The orientation of windows and the position of a building on a site will have an impact on the amount of sunlight it receives but will also have an effect on the sunlight which neighbouring buildings receive. Unlike daylight, which is non-directional and assumes that light from the sky is uniform, the availability of sunlight is dependent on the orientation of the window or area of ground being assessed relative to the position of the sun.

In accordance with the BRE guide, only windows facing within 90 degrees of due south need to be assessed.

There are no south-facing windows directly facing the new development. As a result, this analysis has been excluded from this assessment.

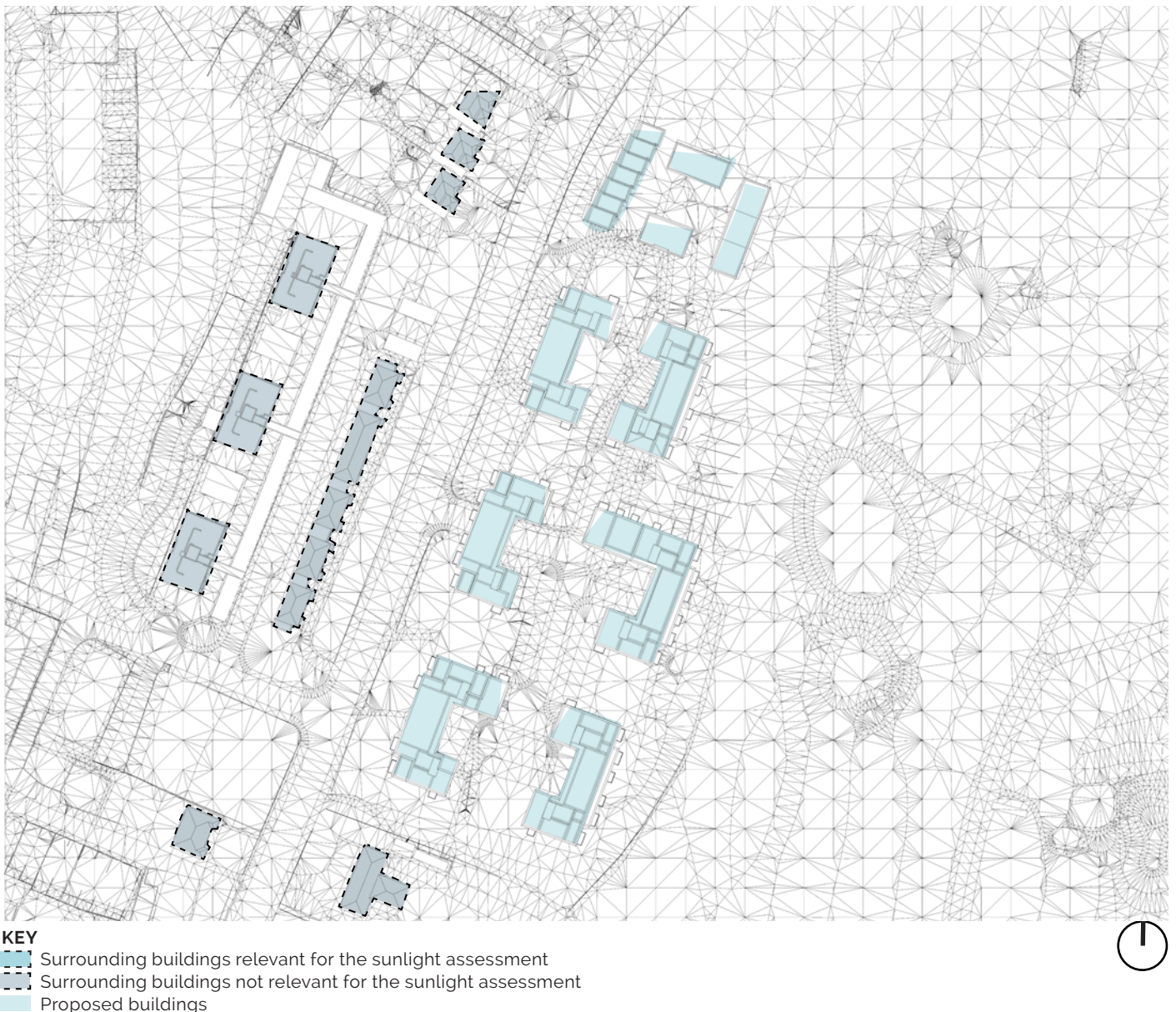


Figure 6. Site plan indicating the existing buildings tested for the sunlight assessment

7.2 Proposed development

In houses, the main requirement for sunlight is in living rooms, where it is valued at any time of day, but especially in the afternoon.

According to the BRE guide, for a space to be reasonably sunlit:

- At least one main window wall should face within 90° of due south and
- The centre of at least one window to a main living room should receive 25% of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March. If a room has multiple windows on the same wall or on adjacent walls, the highest value of APSH should be taken. If a room has two windows on opposite walls, the APSH due to each can be added together.

When a living room has multiple windows in the same or on adjacent walls, the highest probable sunlight value rules. If the living room has two windows on opposite walls, the probable sunlight hours due to each can be added together.

The south-facing living rooms have been assessed as shown in the image below. A total of 45 rooms and 117 windows were assessed against the criteria set out in the BRE guide.

The results show that 97% of the rooms achieve appropriate annual APSH values. Positive results are also achieved in the winter period. Living rooms facing other orientations are not analysed as they fall outside the 90° criterion. Lower sunlight values will be achieved on these windows. However, adequate sunlight access will be provided through access to a communal external space as described in the next section of this report.

Detailed results of the analysis can be found in Appendix 3.



KEY

- Proposed buildings
- Perpendicular projection of the window



Figure 7. Site plan highlighting the proposed buildings tested for the sunlight assessment

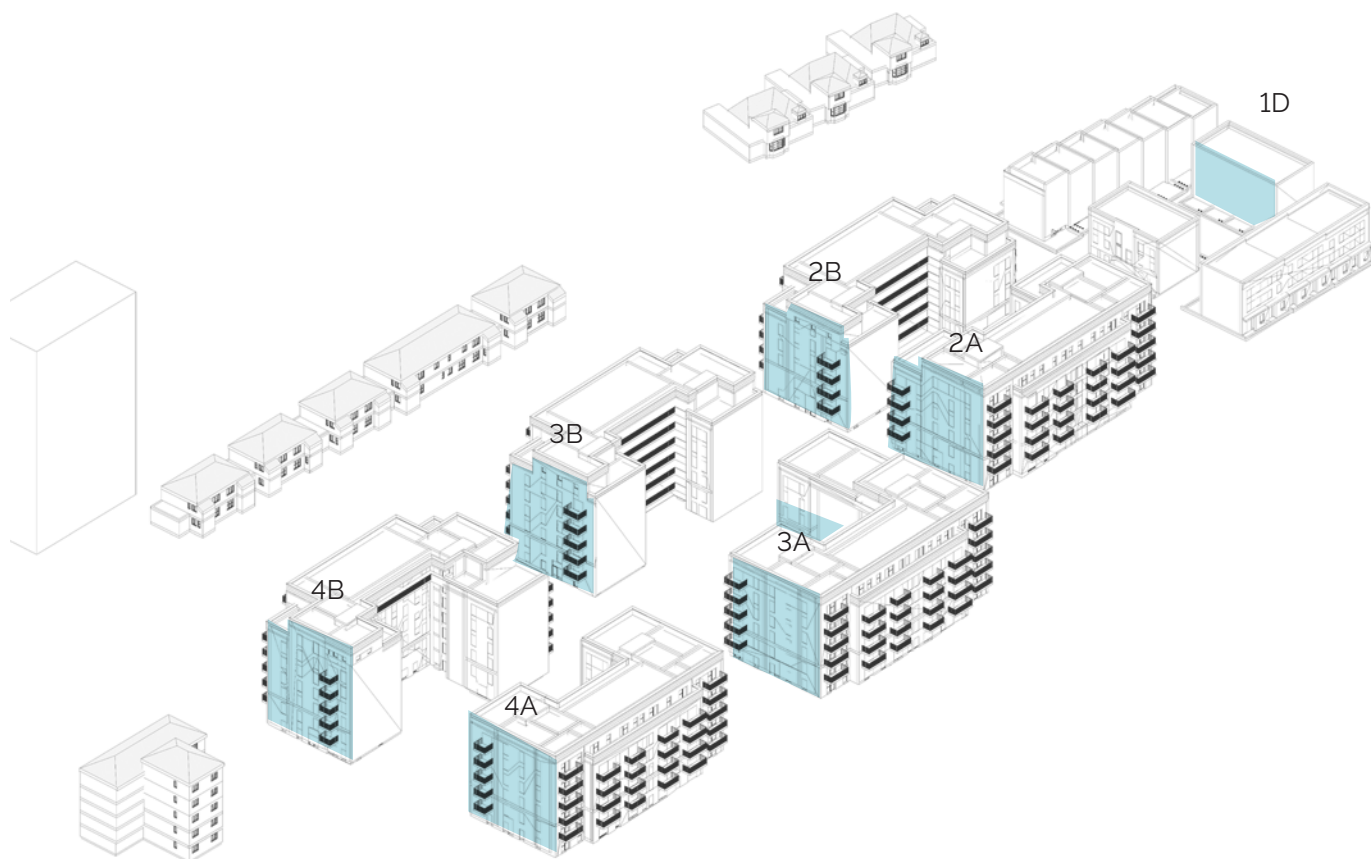


Figure 8. Sunlight analysis - Location of windows analysed for the Annual and Winter APSH test

Table 4. Detailed results of the Sunlight Assessment - Proposed Development

Block	Total no. of rooms	Rooms achieving the Annual APSH criterion		Rooms achieving the Winter APSH criterion	
Block 1D	4	4	100%	4	100%
Block 2A	9	9	100%	9	100%
Block 2B	8	8	100%	8	100%
Block 3A	13	11	85%	13	100%
Block 3B	10	10	100%	10	100%
Block 4A	9	9	100%	9	100%
Block 4B	10	10	100%	10	100%
Total	63	61	97%	63	100%

8.0 Sun-on-the ground Analysis

8.1 Assessment of the existing properties

The recommendations set out in the BRE guide explain how to ensure that outdoor spaces are not permanently in shade for a large part of the year. At least 50% of the open spaces should receive 2 hours of sunlight on the equinox (21st March).

According to the BRE guidance, the availability of sunlight should be checked for all open spaces where it will be required. This would normally include:

- Gardens,
- Parks and playing fields,
- Children’s playgrounds,
- Sitting out areas such as those between non-domestic buildings and in public squares, and
- Focal points of view such as a group of monuments or fountains.

An analysis was carried out to assess the sunlight availability on 21 March, including a comparison with the

existing configuration.

Appendix D presents the shadow range analysis indicating the time of the day when buildings and external spaces will be in shade.

The relevant external spaces are located to the western and southern side of the site as highlighted in the figure 9. The sun-on-the ground analysis has been undertaken for these private gardens on 21 March as recommended in the BRE guideline.

The results show that the amenity spaces all meet the BRE recommendations.

An additional test was also conducted on 21 June to assess the sunlight conditions in the summer period when people usually spend longer hours outdoor and are most likely to use these spaces. All spaces would achieve adequate sunlight conditions and no significant reductions were found for this period.

The following images present a comparison between the existing and the proposed situation. The areas in yellow indicate where at least two hours of sunlight are achieved on the 21 March and on 21 June.

Table 5. Sun on the ground analysis - 21 March - Area with at least 2 hours of sun (%)

Amenity	Existing configuration	Pass/Fail	Proposed configuration	Pass/Fail	Ratio	Condition
1	87.2%	Pass	87.2%	Pass	1.00	Pass
2	100%	Pass	100%	Pass	1.00	Pass
3	95.3%	Pass	95.3%	Pass	1.00	Pass
4	99.6%	Pass	93.1%	Pass	0.93	Pass
5	96.4%	Pass	96.4%	Pass	1.00	Pass
6	99.2%	Pass	99.2%	Pass	1.00	Pass
7	100%	Pass	100%	Pass	1.00	Pass
8	98.4%	Pass	98.4%	Pass	1.00	Pass
9	100%	Pass	100%	Pass	1.00	Pass
10	100%	Pass	100%	Pass	1.00	Pass

It can be concluded that proposed development does not cause unacceptable harm to the surrounding amenity spaces and, overall, the results are acceptable.

Table 6. Sun on the ground analysis - 21 June - Area with at least 2 hours of sun (%)

Amenity	Existing configuration	Pass/Fail	Proposed configuration	Pass/Fail	Ratio	Condition
1	98.19%	Pass	98.43%	Pass	1.00	Pass
2	100%	Pass	100%	Pass	1.00	Pass
3	98.85%	Pass	99.16%	Pass	1.00	Pass
4	100%	Pass	99.99%	Pass	1.00	Pass
5	99.40%	Pass	99.32%	Pass	1.00	Pass
6	100%	Pass	99.74%	Pass	1.00	Pass
7	100%	Pass	100%	Pass	1.00	Pass
8	99.73%	Pass	99.90%	Pass	1.00	Pass
9	100%	Pass	100%	Pass	1.00	Pass
10	100%	Pass	99.96%	Pass	1.00	Pass

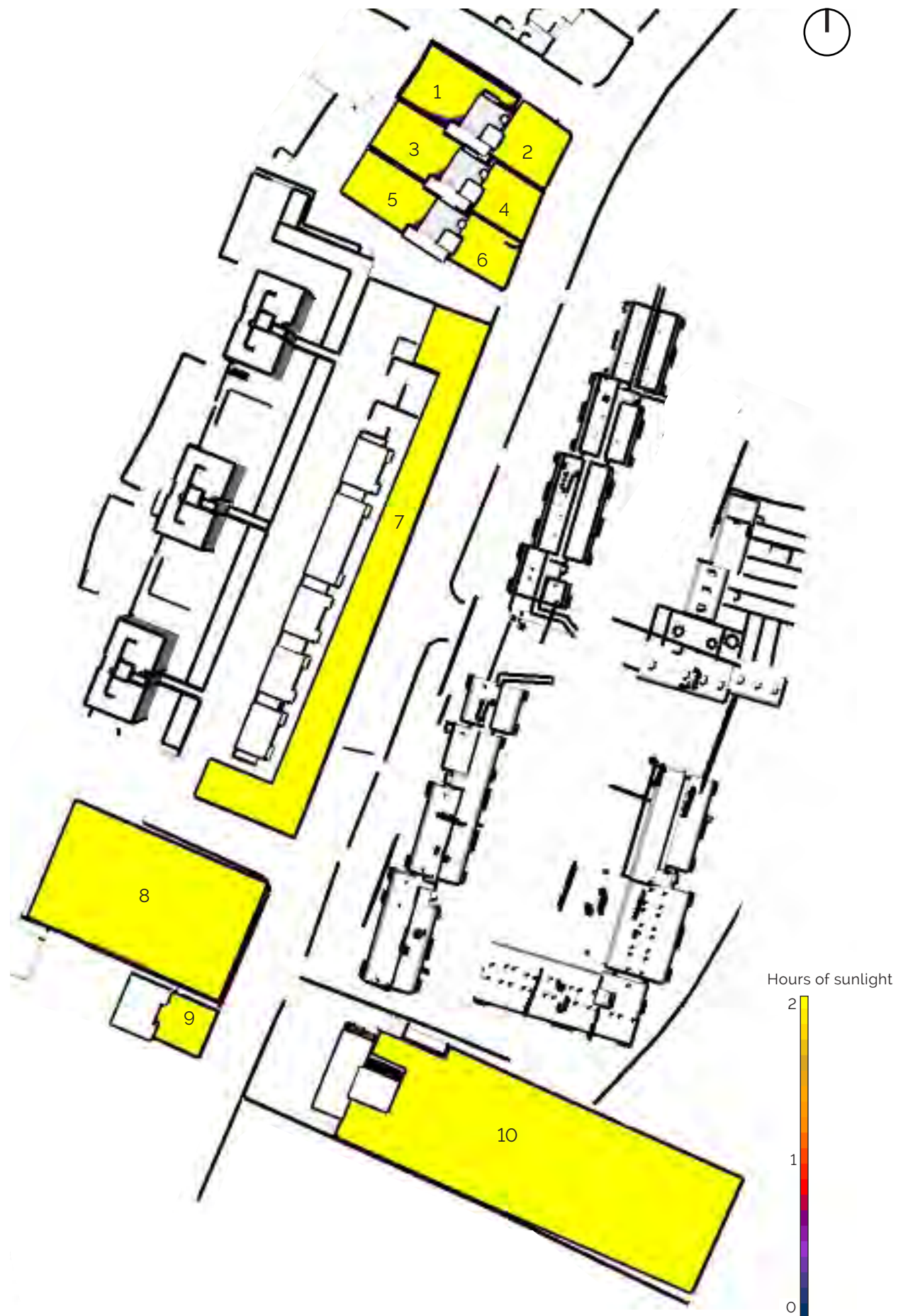


Figure 9. Sun on the ground analysis - Existing configuration - 21 March

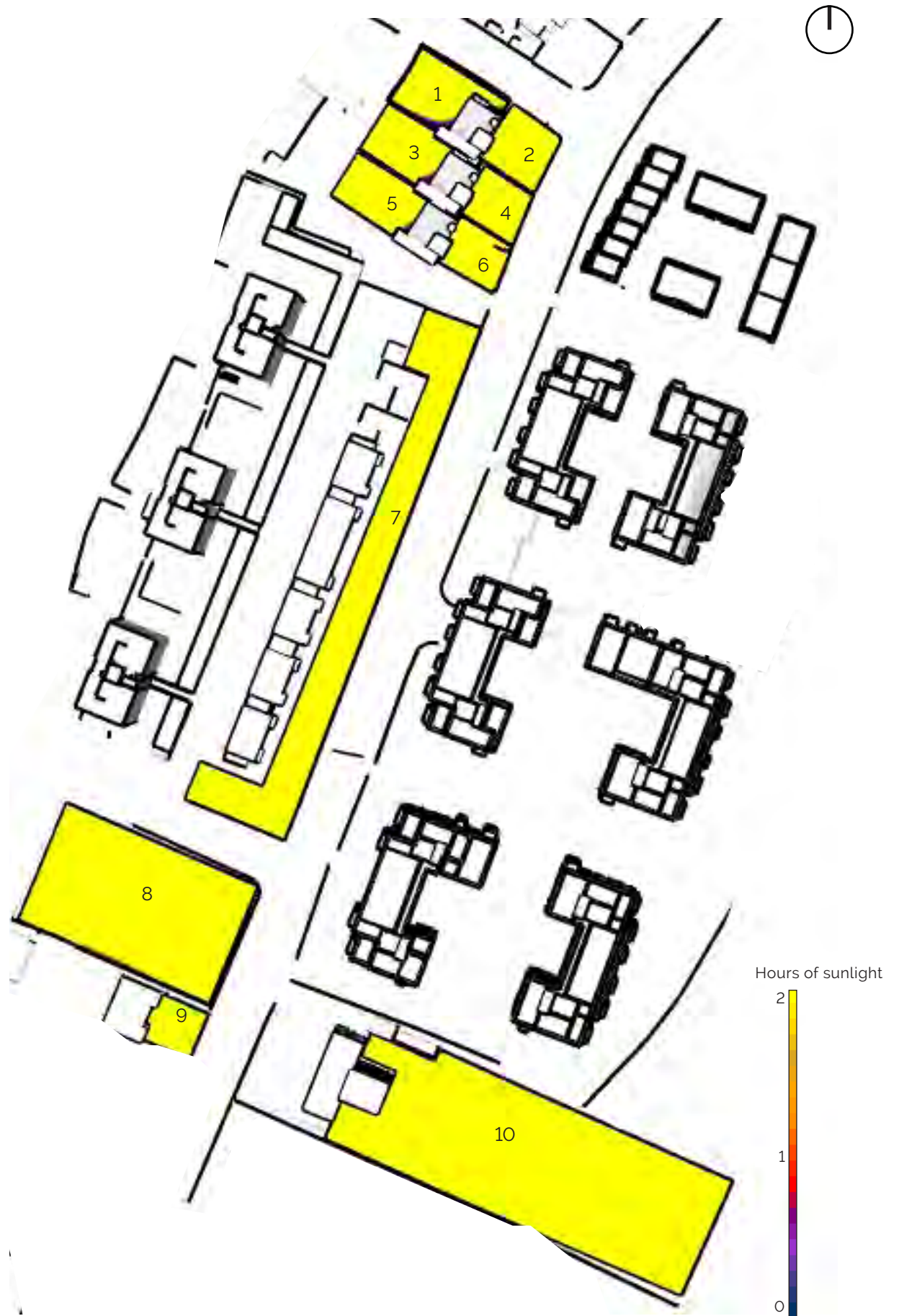


Figure 10. Sun on the ground analysis - Proposed configuration - 21 March

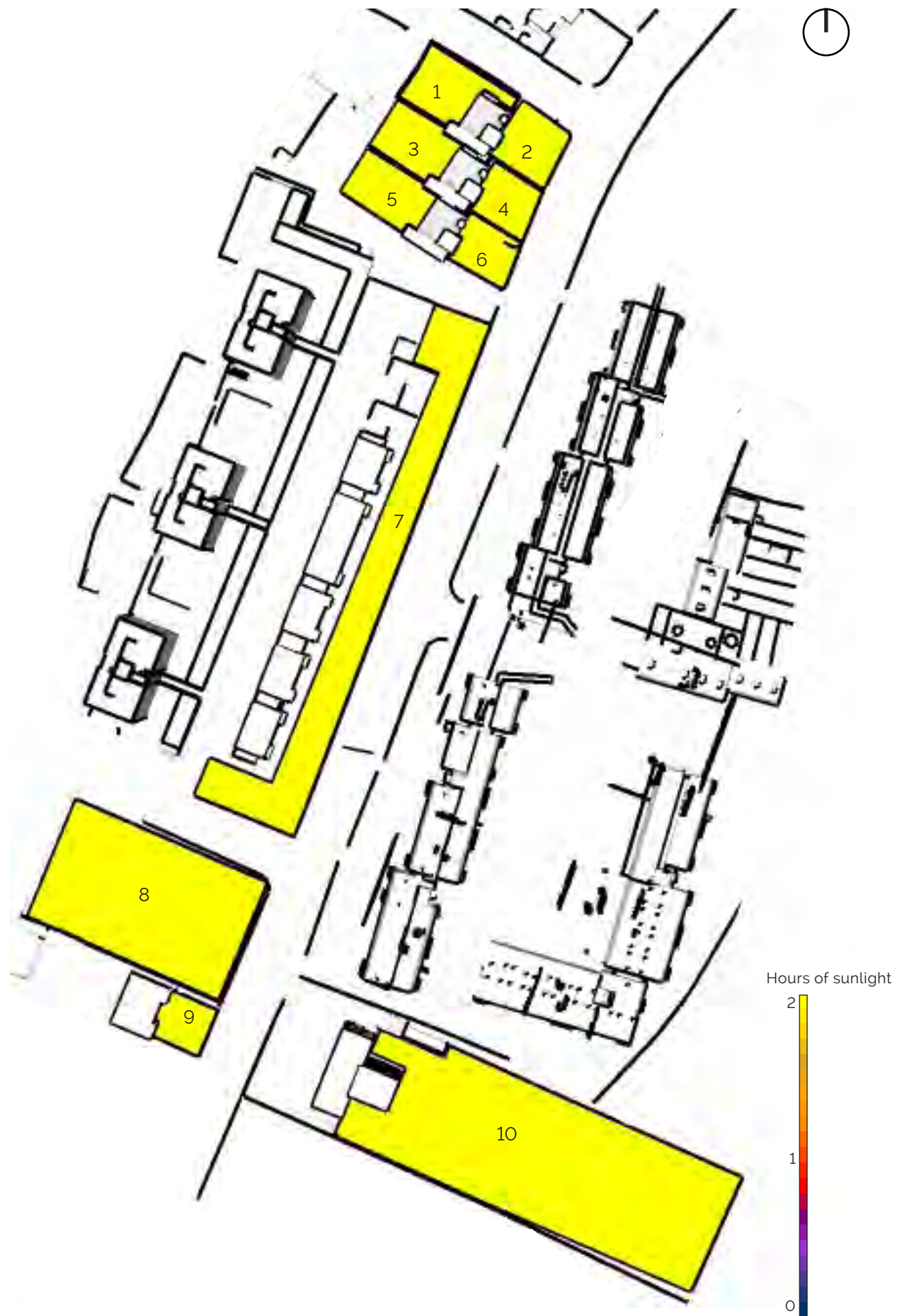


Figure 11. Sun on the ground analysis - Existing configuration - 21 June

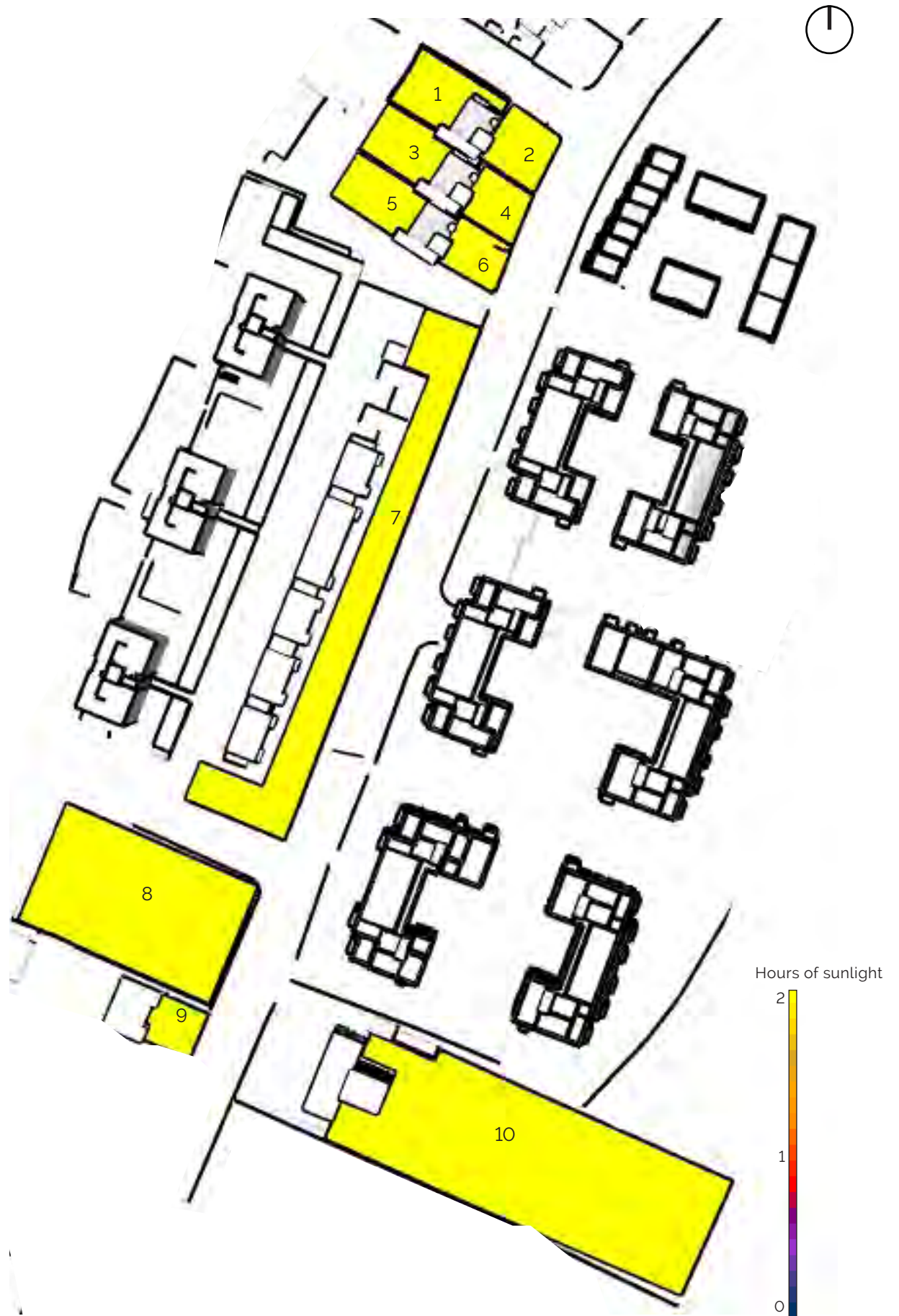


Figure 12. Sun on the ground analysis - Proposed configuration - 21 June

8.2 Assessment of the proposed development

A sunlight assessment was carried out for the proposed amenity spaces.

The design of the external spaces provides three distinct character areas:

- The communal courtyards with play space and pocket gardens and green planted buffers
- The green streets with accessible routes and links into courtyards
- The parkland corridor: an additional green public space running north-south with a play trail, informal seating and a buffer at the interface with Beckenham Place Park.

In order to be in line with the BRE recommendations, at least 50% of its area should receive direct sunlight for two hours or more on 21 March (Spring Equinox).

The results of the sun-on-the-ground analysis indicate that the proposed external spaces comply with the requirements described in the BRE guidelines with the

exception of one amenity space in Phase 2 which achieves values below the recommended target. There is only one communal area in Phase 2 falling below the target. This is the courtyard serving Blocks 2a and 2b. The public amenity space surrounding Blocks 2a and 2b compensates for the loss of sunlight achieved in the courtyard, with results showing full compliance with the minimum requirements. Residents in these blocks will have access to the other amenity spaces which have adequate access to sunlight. Therefore, the resulting impact is defined as negligible. Additional studies have shown that the courtyard would achieve more than 2 hours of sun on at least 50% of the area from April to the end of August.

Table 7 presents the detailed results of the analysis. Figure 11 shows the sunlight availability on 21 March. In particular, the areas in yellow indicate where the 2 hours of sun are achieved on this date.

The analysis was also carried out during summertime (21 June). The results demonstrate that good sunlight will be achieved during this period, when these spaces are most likely to be used.

Table 7. Sunlight on the ground - Proposed spaces

Space	21 March			21 June	
	Area (m ²)	Results (%)	Area meeting BRE criteria (m ²)	Condition for 21 March	Results (%)
Phase 1 - 1a	350	55%	193	Pass	99%
Phase 1 - 1b	151	83%	125	Pass	100%
Phase 1 - 1c	33	100%	33	Pass	100%
Phase 1	533	66%	350	Pass	99%
Phase 2 - 2a	497	34%	169	Fail	85%
Phase 2 - 2b	172	100%	172	Pass	100%
Phase 2	669	51%	341	Pass	89%
Phase 3 - 3a	1142	91%	1040	Pass	98%
Phase - 3b	142	100%	142	Pass	100%
Phase 3	1284	92%	1181	Pass	98%
Phase 4 - 4a	1680	69%	1159	Pass	73%
Phase 4 - 4b	220	100%	220	Pass	100%
Phase 4 - 4c	114	100%	114	Pass	100%
Phase 4 - 4d	75	100%	75	Pass	100%
Phase 4	2089	71%	1493	Pass	78%



Figure 13. Sunlight on the ground - 21 March



Figure 14. Sunlight on the ground - 21 June

9.0 Conclusion

A daylight, sunlight and overshadowing analysis has been carried out by HTA Sustainable futures to assess the impact of the new development on the existing surrounding properties as well as the performance of the new residential units within the scheme.

To ensure that this development can be appropriately evaluated against the current planning policies, the analysis has been carried out in accordance with BRE's guide 'Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice', P J Littlefair (2011). According to the BRE guide:

'...the advice given here is not mandatory and this document should not be seen as an instrument of planning policy. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values'.

Daylight

Daylight in the surrounding buildings

The impact on the surrounding buildings has been minimised to the largest degree. The detailed VSC analysis conducted at the centre of all the existing windows surrounding the proposed buildings shows that all of them meet or exceed the BRE requirements. In addition, all the habitable rooms meet the Daylight Distribution criterion.

Daylight in the proposed development

The design of the proposed development ensures that the proposed dwellings and outdoor spaces receive good daylight and sunlight levels. All the units in the development were assessed against the BRE criteria. Overall, 80% of the dwellings meet or exceed the ADF criterion, while 80% of them meet the requirement for sky-view.

The daylight conditions are, therefore, deemed acceptable.

Sunlight

Sunlight in the surrounding buildings

There are no properties to the north of the site. As a result, this analysis has been excluded from the assessment.

Sunlight in the proposed development

The windows in the south-facing living rooms in the proposed development were assessed and 97% of them meet the annual APSH targets, while all of them meet or exceed the winter targets. The design maximises the dual aspect living rooms facing south to guarantee adequate sunlight access when possible.

Overshadowing

Sunlight on the ground in the existing spaces

The overshadowing assessment shows that the external spaces that could be potentially impacted by the proposed development achieve the target found in the BRE recommendations on 21 March.

Sunlight on the ground in the new amenity spaces

The overshadowing analysis that was carried out in the proposed amenity space complies with the BRE criterion in terms of sunlight provision on the ground on 21 March. There is only space (2a) in Phase 2, serving Blocks 2a and 2b, achieving sunlight levels below the BRE recommendations. The amenity space to the east meets and exceeds the BRE recommendations for sunlight provisions and it compensates for the loss of sunlight achieved in the courtyard. All the spaces achieve good sunlight availability on 21 June.

Overall, the impact of the new buildings on the existing surroundings is considered acceptable in terms of daylight and sunlight access. The majority of the residential units within the proposed development comply with the BRE criteria and, therefore, are expected to receive adequate daylight and sunlight levels throughout the year. The communal amenity space is designed to ensure that adequate sunlight access is provided throughout the year. It can be concluded that the overall daylight and sunlight results are acceptable.

APPENDIX A.11 1 CALVERLY CLOSE COMMITTEE REPORT

Committee Date	10 th January 2023	
Address	Clifford House 1 Calverley Close Beckenham BR3 1UH	
Application number	22/03013/FULL1	Officer: Claire Brew
Ward	Beckenham Town and Copers Cope	
Proposal (Summary)	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.	
Applicant	Agent	
Bromley Regeneration (Calverley Close) LLP	Miss Nadine James Montagu Evans	
Reason for referral to committee	Major Development 20+ new dwellings, outside of delegated authority	Councillor call in No

RECOMMENDATION	PERMISSION
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Summary

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

Table 1: Key Designations

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

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

Table 2: Existing and Proposed residential unit mix

Vehicle parking	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

Electric vehicle charging spaces	20% active 80% passive
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Table 4: Electric vehicle charging spaces

Representation summary	<ul style="list-style-type: none"> • A site notice was displayed from 26.08.22 • Neighbour letters were initially sent on 24.08.22 to 858 individual addresses in the locality • A press ad was displayed News Shopper on the 31.08.22 • Initial consultation is for a minimum of 21 days
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	<ul style="list-style-type: none"> A further round of neighbourhood consultation letters were sent on 6.12.22 (14 day consultation)
Total number of responses	46
Number in support	4
Number of objections	41
Neutral	1

Table 5: Representation summary

Section 106 Heads of Term	Amount	Agreed in Principle
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
Total	£516,108	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

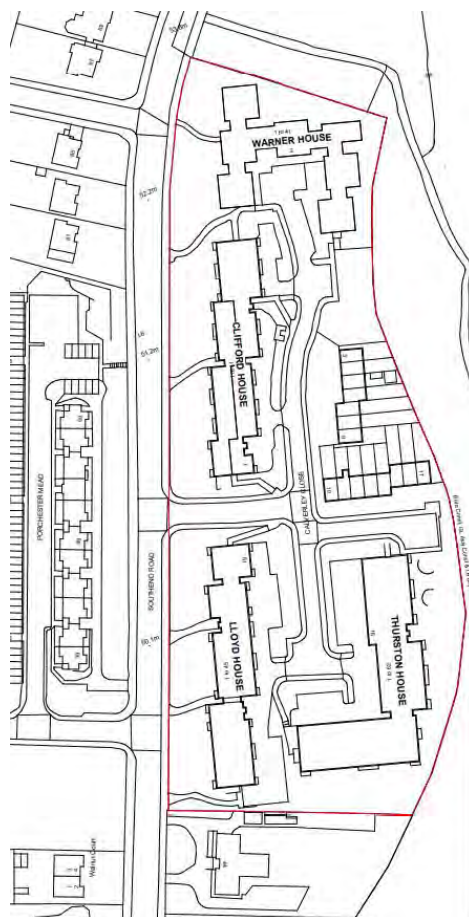


Figure 1: Site Location Plan

- 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 reprovision 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

- 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 16th 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 2nd September 2022
- 3.3 Application reference 17/04110/EIA – EIA screening opinion request received 6th 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:

Chapter 2 Spatial Development Patterns	
Policy SD10	Strategic and local regeneration
Chapter 3 Design	
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
Chapter 4 Housing	
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
Chapter 5 Social Infrastructure	
Policy S4	Play and informal recreation

Chapter 7 Heritage and Culture	
Policy HC1	Heritage conservation and growth
Policy HC3	Strategic and Local Views
Policy HC4	London View Management Framework
Chapter 8 Green Infrastructure and Natural Environment	
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
Chapter 9 Sustainable Infrastructure	
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
Chapter 10 Transport	
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
Chapter 11 Funding the London Plan	
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 2nd 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 13th July 2022 and a financial viability update dated 18th 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 16,783m² (including Warner House) to 18,623m² (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_x 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 16th 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**

APPENDIX A.12 PIKE CLOSE DAYLIGHT, SUNLIGHT AND OVERSHADOWING REPORT



Pike Close Estate, Bromley

Daylight, Sunlight and Overshadowing Assessment Addendum

February 2022

Executive Summary

This addendum provides an update to the daylight, sunlight and overshadowing analysis undertaken for the original planning application and captures amendments made in response to comments received from London Borough of Bromley. (LBB).

A summary of the key changes are summarised below:

Building B is reduced to 13 storeys to ensure that none of the proposed buildings exceed the existing buildings in storey heights while retaining the attractive proportions of the buildings and the quality of accommodation afforded by the higher floor-to-ceiling heights. The building is also set-back further away from Burnt Ash heights to create a more generous relationship with Burnt Ash Lane and an opportunity for additional tree planting.

Building A is reduced by a full storey to improve the transition between the proposed and existing context, the houses to the North of Kynaston Road and across the street on Burnt Ash Lane.

To accommodate the affordable homes lost in the reduction of the heights of Building A and ensure an adherence to the single decant strategy, a storey is added to the taller element of Building C.

The revised proposals now has buildings ranging from 2 to 13 storeys. It ranged from 2 & 3 storey houses to apartment buildings that ranges from part 5 & 8 storeys to 4 & 9 storeys rising to a 13 storey tall building.

The results of the daylight and sunlight impact on the existing surrounding buildings have been updated to account for the changes described above. The assessment of the proposed buildings has also been updated to reflect the changes.

Daylight

Impact on the existing buildings

The daylight analysis considered all the **surrounding buildings** with main windows facing the development. The following properties were assessed against the daylight criteria:

- Rotunda Court
- 1-9 Ravensleigh Gardens
- 1-11 Kynaston Road and 1-5 Sandringham Road
- 167 Burnt Ash Lane and 2-12 Kynaston Road
- 152-162 Burnt Ash Lane
- Toyota Garage

Rotunda Court

The numerical results of the Average Daylight Factor and No-Sky Line of the habitable rooms of the Rotunda Court building have been updated. The additional floor in Block C would not cause a significant reduction compared with the results described in the original report. The overall number of compliant spaces is in line with the original assessment.

1-9 Ravensleigh Gardens

The proposed amendments would not have a significant effect on these properties. The results of the analysis confirm that the retained values are in line with the values described in the original report.

1-11 Kynaston Road, 1-5 Sandringham Road, 167 Burnt Ash Lane and 2-12 Kynaston Road

The proposed changes to the massing do not affect these properties. The retained values remain in line with the values described in the original report

152-162 Burnt Ash Lane

The amendment to the building heights are still in line with the original concept of locating taller elements where they have the least impact on neighbouring buildings, seeking to mediate between the proposals and its immediate context. The reduction in height further improves upon the mediation between the proposed and existing contexts. The improvements are particularly reflected in properties at 152-162 Burnt Ash Lane. The retained values are marginally higher than the previous assessment, with two additional windows now showing full compliance with the BRE criteria for Vertical Sky Component (window no. 140, 141).

Toyota Garage

The proposed changes would also reduce the impact on this building. Numerical results are not presented as this property does not have a requirement for daylight or sunlight.

Assessment of the proposed development

The results of the proposed units have been updated in line with the proposed amendments.

Overall, the results show good levels of daylight within the proposed scheme. In particular, 83% of the proposed rooms meet or exceed the recommended targets for Average Daylight Factor. In addition to good levels of daylight ingress and sky visibility can be seen in 81% of the proposed rooms, as they meet or exceed the BRE recommendation for No-Sky Line (NSL).

Whilst some rooms fall below the recommended targets, most of the habitable rooms meet or exceed the targets. The rooms achieving lower values generally face the buildings' secondary facades or are partially obstructed by the balcony above the main window. All units are served by an external balcony and balconies generally receive high levels of daylight. A well lit balcony is usually perceived by the internal occupier. This amenity value of a well-lit balcony would arguably be ignored when considering whether the unit, as whole, gets sufficient daylight.

Overall, the daylight availability of the scheme is deemed good.

Sunlight

Impact on the existing buildings

The impact of the proposed development on the **existing surrounding buildings** has been assessed in terms of sunlight provision. The annual and winter APSH analysis was carried out on the south-facing windows of the existing surrounding properties directly facing the Proposed Development. The following properties were assessed:

- 1-9 Ravensleigh Gardens
- 1-11 Kynaston Road and 1-5 Sandringham Road

The results of the revised calculations are in line with the results described in the original report.

Assessment of the proposed development

To assess the sunlight provision **within the scheme** the BRE guide recommends that living rooms that face within 90° due south should be tested.

The updated results show that all the tested windows achieve adequate sunlight throughout the year. Positive results are also achieved in the winter period.

Sunlight on the ground - Overshadowing

No significant changes are found in terms of sun-on-the-ground availability for both the existing and the proposed amenity spaces.

Overall, the daylight and sunlight impact to neighbouring properties remains in line with the results described in the original report. Improvements are found to the properties along Burnt Harsh lane and some negligible reductions, compared with the previous analysis, are found in the units at Rotunda Court directly facing the new development.

The following tables summarise the revised outcome of the analysis.

Table 1. Daylight Assessment: Impact on the surrounding buildings - VSC

	Analysed windows	No. of windows meeting VSC above 18%	% of windows meeting VSC above 18%	No. of windows meeting VSC above 27%	% of windows meeting VSC above 27%
Rotunda Court	46	45	98%	46	100%
1-9 Ravensleigh Gardens	53	52	98%	53	100%
1-11 Kynaston Road and 1-5 Sandringham Road	22	22	100%	22	100%
167 Burnt Ash Lane and 2-12 Kynaston Road	9	9	100%	9	100%
152-162 Burnt Ash Lane	25	24	96%	12	48%

Table 2. Daylight Assessment: Impact on the surrounding buildings - Daylight Distribution

	Analysed rooms	No. of rooms meeting BRE criteria	% of rooms meeting BRE criteria
Rotunda Court	44	33	75%
152-162 Burnt Ash Lane	6	6	100%

Table 3. Summary results of the Daylight Assessment - Proposed development

	Average Daylight Factor				No-Sky Line		
	Analysed rooms	No. of rooms meeting the target	Rooms meeting the BRE criteria (%)	No. of rooms meeting the target of 1.5% for the Kitchen Living Dinning rooms(%)	Rooms meeting the 1.5% criteria for the Kitchen Living Dinning rooms(%)	No. of rooms meeting the target	Rooms meeting the BRE criteria (%)
Block A	77	55	71%	60	78%	67	87%
Block B	176	176	100%	176	100%	153	87%
Block C	104	70	67%	77	74%	76	73%
Block D	79	58	73%	68	86%	49	62%
Block E	41	39	95%	41	100%	41	100%
Block F	10	7	70%	10	100%	10	100%
Total	487	405	83%	432	89%	396	81%



Figure 1. Top view of the site - Rotunda Court



Figure 2. 3D view of the model - Rotunda Court

Table 4. Daylight Assessment: Impact on the surrounding buildings - Rotunda Court

Window Ref	VSC Existing (%)	VSC Proposed (%)	Pr/Ex	VSC above 18%?	Meets BRE Criteria
Rotunda Court					
305	19.43	18.72	0.96	YES	YES
298	23.73	21.2	0.89	YES	YES
293	23.04	21.69	0.94	YES	YES
294	24.57	21.56	0.88	YES	YES
334	26.78	22.1	0.83	YES	YES
286	28.27	22.44	0.8	YES	YES

313	30.74	24.59	0.8	YES	YES
320	32.95	26.36	0.8	YES	YES
324	36.72	33.41	0.91	YES	YES
306	15.05	14.94	0.99	NO	YES
304	24.57	20.6	0.84	YES	YES
299	28.09	23.31	0.83	YES	YES
295	29.27	23.59	0.81	YES	YES
292	30.35	23.62	0.8	YES	YES
333	31.30	25.04	0.8	YES	YES
287	32.29	25.83	0.8	YES	YES
314	33.13	26.50	0.8	YES	YES
319	34.75	27.07	0.8	YES	YES
325	37.75	34.31	0.91	YES	YES
309	22.35	18	0.8	YES	YES
303	25.78	22.7	0.88	YES	YES
300	29.40	25.63	0.87	YES	YES
296	30.49	25.87	0.85	YES	YES
291	31.52	25.83	0.82	YES	YES
332	32.49	26.37	0.81	YES	YES
288	33.45	26.85	0.8	YES	YES
315	34.25	27.29	0.8	YES	YES
318	35.83	29.22	0.82	YES	YES
326	38.50	35.41	0.92	YES	YES
310	23.26	18.03	0.8	YES	YES
302	27.53	25.73	0.93	YES	YES
301	30.60	28.08	0.92	YES	YES
297	31.46	28.15	0.89	YES	YES
290	32.48	28.1	0.87	YES	YES
289	33.25	28.53	0.86	YES	YES
330	34.17	29.05	0.85	YES	YES
316	34.94	29.58	0.85	YES	YES
327	38.92	36.15	0.93	YES	YES
331	36.42	31.17	0.86	YES	YES
311	25.27	20.98	0.83	YES	YES

308	29.95	29.17	0.97	YES	YES
329	31.76	30.47	0.96	YES	YES
307	33.12	30.82	0.93	YES	YES
323	34.32	31.28	0.91	YES	YES
321	36.19	32.66	0.9	YES	YES
322	35.32	31.97	0.91	YES	YES



Figure 3. Rotunda court - Level 0 - DD levels with the proposed configuration in place



Figure 4. Rotunda court - Level 1 - DD levels with the proposed configuration in place



Figure 5. Rotunda court - Level 2 - DD levels with the proposed configuration in place



Figure 6. Rotunda court - Level 3 - DD levels with the proposed configuration in place

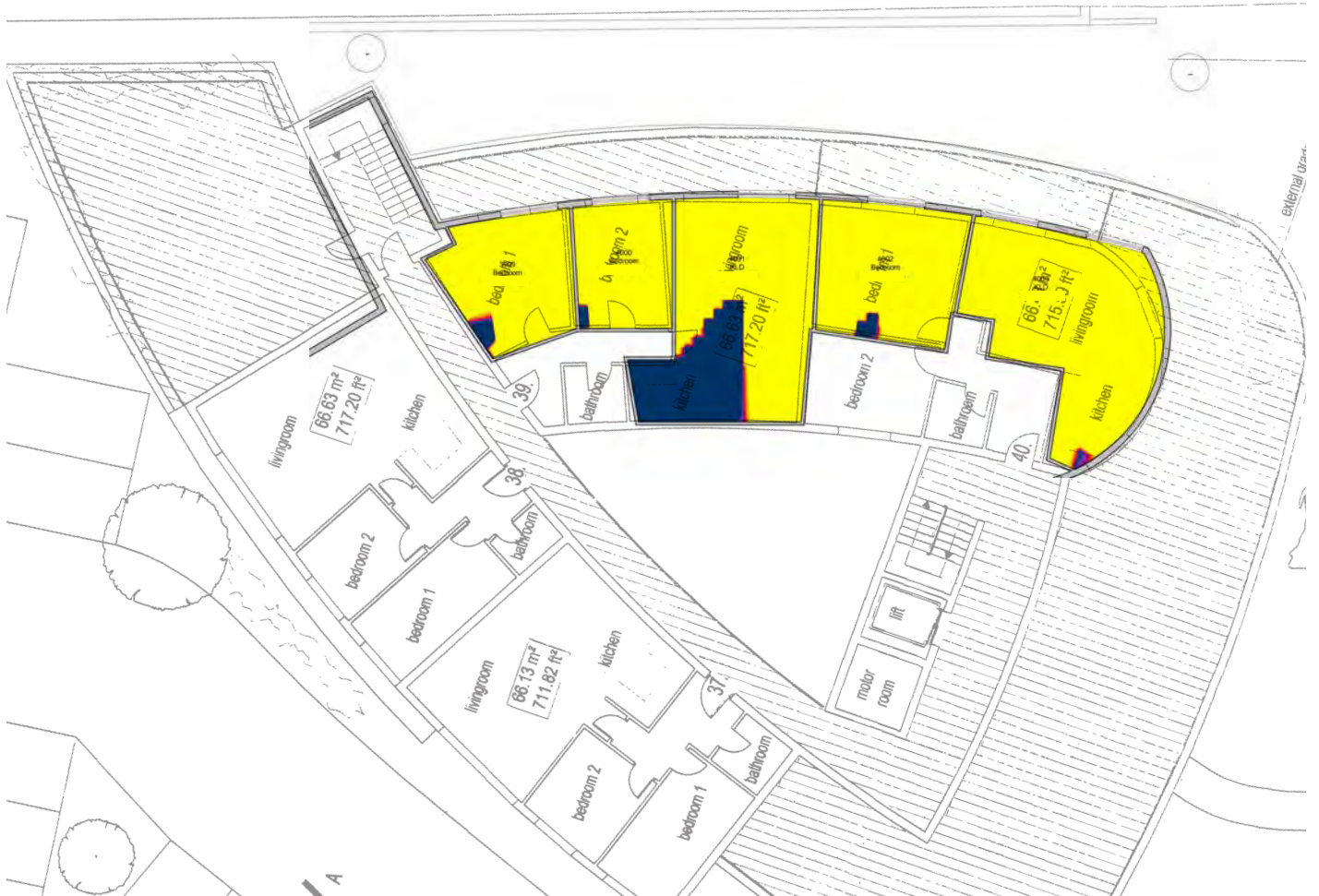


Figure 7. Rotunda court - Top Floor - DD levels with the proposed configuration in place

Table 5. Rotunda Court - Daylight Distribution

Room Ref	Floor Ref	Room Use	Existing DD value	Proposed DD value	Pr/Ex	Meets BRE criteria
3968	Level 0	KLD	76.51%	79.11%	1.03	YES
3969	Level 0	Bedroom	73.38%	87.27%	1.19	YES
3970	Level 0	KLD	93.94%	81.25%	0.86	YES
3971	Level 0	Bedroom	79.63%	69.17%	0.87	YES
3972	Level 0	Bedroom	92.94%	64.03%	0.69	NO
3973	Level 0	Bedroom	93.13%	56.02%	0.60	NO
3974	Level 0	KLD	100.00%	100.00%	1.00	YES
4007	Level 0	Bedroom	85.25%	85.66%	1.00	YES
4008	Level 0	Bedroom	90.88%	90.85%	1.00	YES
3975	Level 1	KLD	82.66%	80.77%	0.98	YES
3976	Level 1	Bedroom	88.78%	88.58%	1.00	YES
3977	Level 1	Bedroom	95.10%	79.87%	0.84	YES
3978	Level 1	KLD	88.95%	59.12%	0.66	NO

3979	Level 1	Bedroom	95.60%	72.28%	0.76	NO
3980	Level 1	Bedroom	97.04%	68.21%	0.70	NO
3981	Level 1	Bedroom	96.11%	60.85%	0.63	NO
3982	Level 1	KLD	100.00%	99.29%	0.99	YES
4009	Level 1	Bedroom	94.35%	94.23%	1.00	YES
4010	Level 1	Bedroom	88.52%	89.19%	1.01	YES
3983	Level 2	KLD	82.74%	82.23%	0.99	YES
3984	Level 2	Bedroom	88.09%	90.35%	1.03	YES
3985	Level 2	Bedroom	94.85%	82.40%	0.87	YES
3986	Level 2	KLD	89.13%	59.03%	0.66	NO
3987	Level 2	Bedroom	95.38%	74.57%	0.8	YES
3988	Level 2	Bedroom	97.05%	69.44%	0.72	NO
3989	Level 2	Bedroom	96.13%	70.99%	0.74	NO
3990	Level 2	KLD	100.00%	99.63%	1.00	YES
4011	Level 2	Bedroom	94.39%	94.23%	1.00	YES
4012	Level 2	Bedroom	89.43%	89.97%	1.01	YES
3991	Level 3	KLD	83.07%	85.55%	1.03	YES
3992	Level 3	Bedroom	89.26%	91.48%	1.02	YES
3993	Level 3	Bedroom	95.58%	84.25%	0.88	YES
3994	Level 3	KLD	89.03%	59.48%	0.67	NO
3995	Level 3	Bedroom	96.56%	75.98%	0.8	YES
3996	Level 3	Bedroom	97.15%	76.35%	0.8	YES
3997	Level 3	Bedroom	97.24%	76.56%	0.8	YES
3998	Level 3	KLD	100.00%	100.00%	1.00	YES
4013	Level 3	Bedroom	95.67%	95.20%	1.00	YES
4014	Level 3	Bedroom	95.62%	96.02%	1.00	YES
3999	Level 4	Bedroom	97.96%	89.43%	0.91	YES
4000	Level 4	Bedroom	96.52%	94.81%	0.98	YES
4001	Level 4	KLD	95.70%	65.50%	0.68	NO
4002	Level 4	Bedroom	98.11%	92.70%	0.94	YES
4003	Level 4	KLD	100.00%	99.06%	0.99	YES

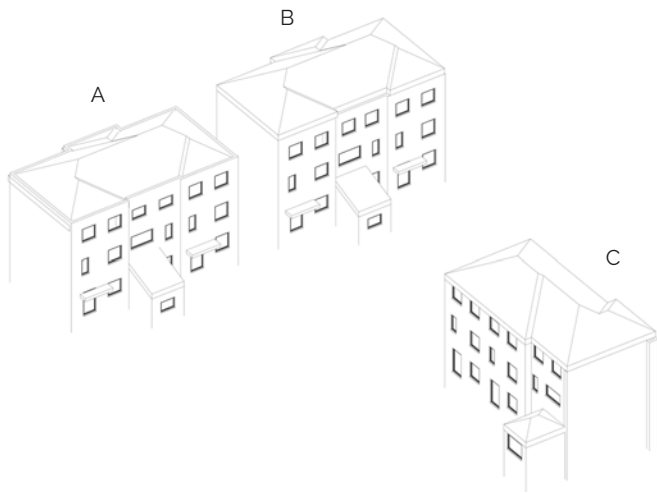


Figure 8. Top view of the site - 1-9 Ravensleigh Gardens

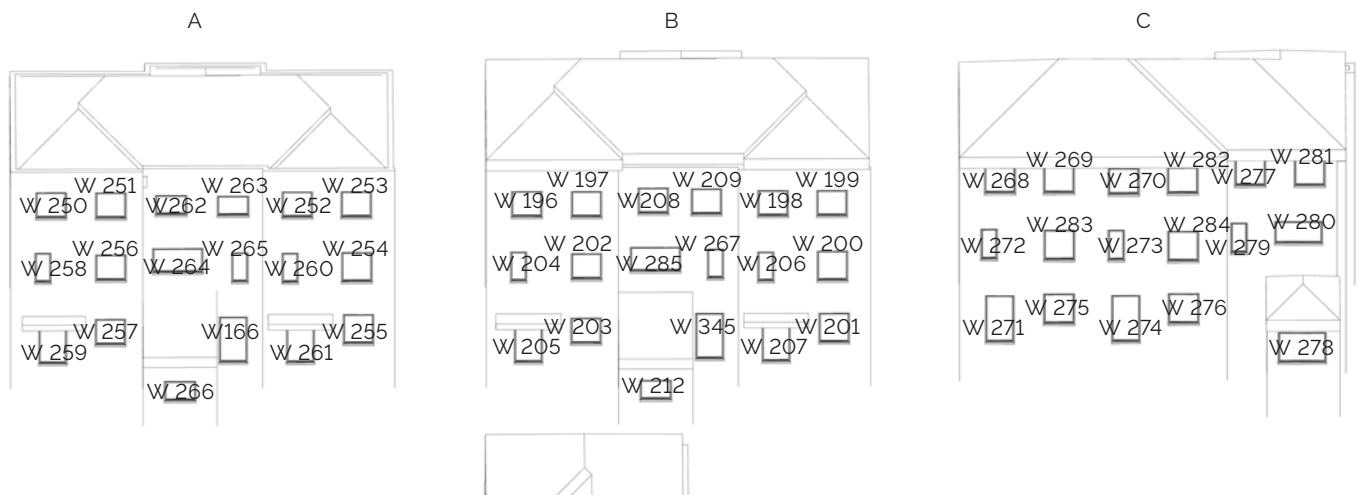


Figure 9. 3D view of the model - 1-9 Ravensleigh Gardens

Table 6. Daylight Assessment: Impact on the surrounding buildings - Ravensleigh Gardens

Window Ref	VSC Existing (%)	VSC Proposed (%)	Pr/Ex	VSC above 18%?	Meets BRE Criteria
Ravensleigh Gardens					
205	20.33	19.28	0.95	YES	YES
207	23.63	22.61	0.96	YES	YES
166	21.91	22.20	1.01	YES	YES
259	18.74	14.82	0.8	NO	YES
261	20.57	18.92	0.92	YES	YES
267	22.40	22.85	1.02	YES	YES

Window Ref	VSC Existing (%)	VSC Proposed (%)	Pr/Ex	VSC above 18%?	Meets BRE Criteria
274	25.00	20.78	0.83	YES	YES
201	34.82	33.52	0.96	YES	YES
203	27.65	26.65	0.96	YES	YES
212	32.83	31.41	0.96	YES	YES
255	31.84	30.26	0.95	YES	YES
257	25.26	21.13	0.84	YES	YES
266	29.78	26.23	0.88	YES	YES
275	25.10	21.17	0.84	YES	YES
276	25.27	21.16	0.84	YES	YES
278	23.66	21.22	0.9	YES	YES
284	27.55	23.83	0.87	YES	YES
200	36.01	34.83	0.97	YES	YES
202	34.67	33.75	0.97	YES	YES
204	34.35	33.38	0.97	YES	YES
206	35.69	34.56	0.97	YES	YES
345	23.72	23.28	0.98	YES	YES
285	34.98	33.91	0.97	YES	YES
254	33.26	31.79	0.96	YES	YES
256	30.60	26.76	0.87	YES	YES
258	29.53	24.68	0.84	YES	YES
260	32.65	30.77	0.94	YES	YES
264	31.18	28.08	0.9	YES	YES
265	31.73	29.33	0.92	YES	YES
271	24.56	20.95	0.85	YES	YES
272	26.64	23.35	0.88	YES	YES
273	27.32	23.06	0.84	YES	YES
283	26.98	23.10	0.86	YES	YES
279	21.11	17.59	0.83	YES	YES
280	27.14	24.18	0.89	YES	YES
196	35.76	34.85	0.97	YES	YES
197	36.03	35.18	0.98	YES	YES
198	36.94	35.91	0.97	YES	YES

Window Ref	VSC Existing (%)	VSC Proposed (%)	Pr/Ex	VSC above 18%?	Meets BRE Criteria
250	30.79	26.62	0.86	YES	YES
251	31.75	28.39	0.89	YES	YES
252	34.04	32.44	0.95	YES	YES
269	28.84	25.13	0.87	YES	YES
277	27.59	23.80	0.86	YES	YES
199	37.13	36.07	0.97	YES	YES
208	35.96	34.97	0.97	YES	YES
209	36.08	35.11	0.97	YES	YES
253	34.60	33.29	0.96	YES	YES
262	32.37	29.65	0.92	YES	YES
263	32.77	30.62	0.93	YES	YES
268	28.47	25.38	0.89	YES	YES
270	29.28	25.04	0.86	YES	YES
281	29.69	26.09	0.88	YES	YES
282	29.67	25.69	0.87	YES	YES



Figure 10. Top view of the site - 1-11 Kynsaston Road and 1-5 Sandringham Road

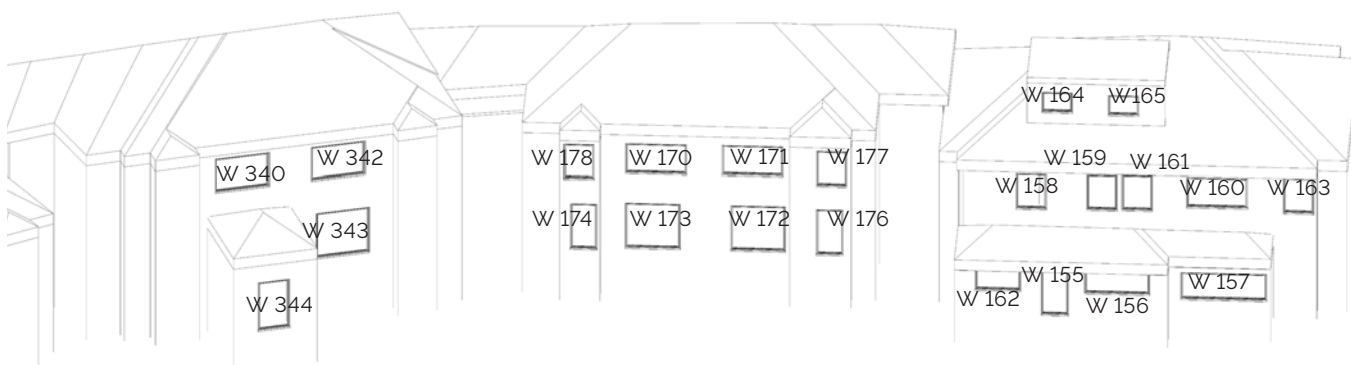


Figure 11. 3D view of the model - 1-11 Kynsaston Road and 1-5 Sandringham Road

Table 7. Daylight Assessment: Impact on the surrounding buildings - 1-11 Kynsaston Road and 1-5 Sandringham Road

Window Ref	VSC Existing (%)	VSC Proposed (%)	Pr/Ex	VSC above 18%?	Meets BRE Criteria
1-11 Kynsaston Road and 1-5 Sandringham Road					
170	38.07	35.16	0.92	YES	YES
171	36.45	34.44	0.93	YES	YES
162	37.07	31.84	0.86	YES	YES
155	36.75	31.07	0.85	YES	YES
156	36.87	30.97	0.84	YES	YES
157	35.94	29.66	0.82	YES	YES

174	37.48	34.09	0.92	YES	YES
172	34.88	32.04	0.91	YES	YES
158	37.90	33.51	0.88	YES	YES
159	37.83	33.1	0.87	YES	YES
160	37.64	32.38	0.86	YES	YES
161	37.78	32.88	0.87	YES	YES
163	37.63	31.72	0.84	YES	YES
173	36.85	33.32	0.91	YES	YES
176	37.47	33.32	0.89	YES	YES
177	38.42	34.88	0.91	YES	YES
344	37.63	34.13	0.91	YES	YES
343	32.74	29.32	0.9	YES	YES
340	38.09	35.33	0.93	YES	YES
165	37.99	33.91	0.89	YES	YES
342	38.24	35.28	0.92	YES	YES
164	38.01	34.3	0.9	YES	YES
178	38.32	35.69	0.93	YES	YES



Figure 12. Top view of the site - 167 Burnt Ash Lane and 2-12 Kynaston Road

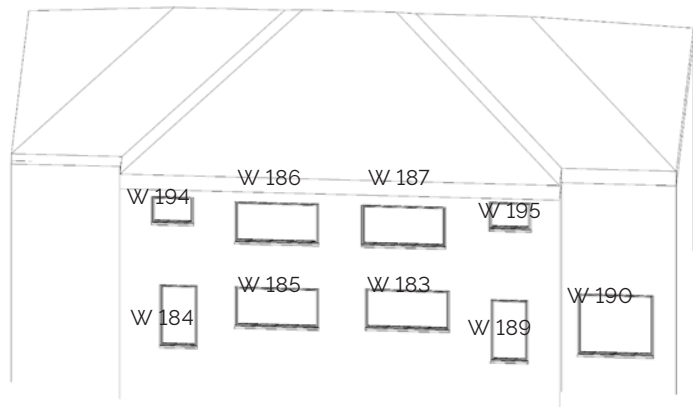


Figure 13. 3D view of the model - 167 Burnt Ash Lane and 2-12 Kynaston Road

Table 8. Daylight Assessment: Impact on the surrounding buildings - 167 Burnt Ash Lane and 2-12 Kynaston Road

Window Ref	VSC Existing (%)	VSC Proposed (%)	Pr/Ex	VSC above 18%?	Meets BRE Criteria
167 Burnt Ash Lane and 2-12 Kynaston Road					
183	35.12	31.1	0.89	YES	YES
185	34.52	30.92	0.9	YES	YES
187	37.08	33.25	0.9	YES	YES
190	32.07	27.66	0.87	YES	YES
189	35.07	30.74	0.88	YES	YES
184	34.02	30.58	0.91	YES	YES
186	36.81	33.23	0.9	YES	YES
194	36.64	33.33	0.91	YES	YES
195	37.21	33.15	0.89	YES	YES



Figure 14. Top view of the site - 152-162 Burnt Ash Lane

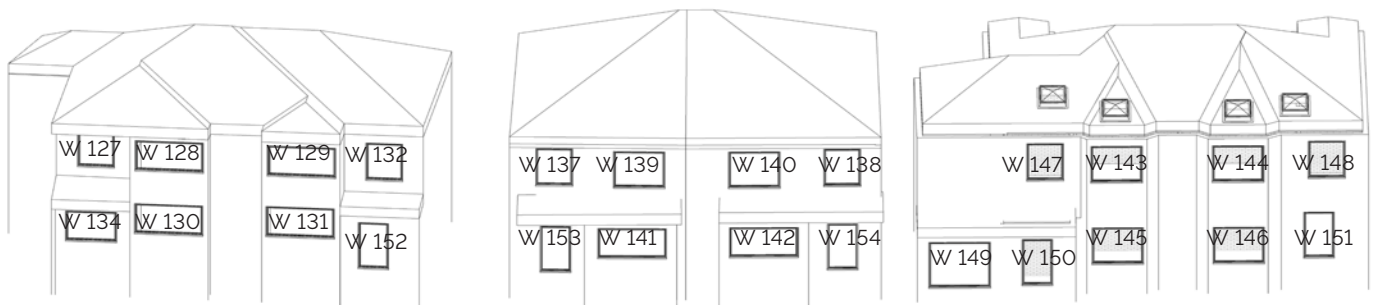


Figure 15. 3D view of the model - 152-162 Burnt Ash Lane

Table 9. Daylight Assessment: Impact on the surrounding buildings - 152-162 Burnt Ash Lane

Window Ref	VSC Existing (%)	VSC Proposed (%)	Pr/Ex	VSC above 18%?	Meets BRE Criteria
152-162 Burnt Ash Lane					
149	34.85	23.54	0.68	YES	NO
150	34.52	22.66	0.66	YES	NO
151	33.88	20.69	0.61	YES	NO
153	25.85	20.67	0.77	YES	NO
154	27.70	17.52	0.63	NO	NO
130	37.73	34.02	0.9	YES	YES

131	37.56	32.98	0.87	YES	YES
134	37.86	34.35	0.91	YES	YES
141	35.55	27.05	0.76	YES	YES
142	35.65	25.97	0.73	YES	NO
145	34.21	20.82	0.64	YES	NO
146	34.42	21.61	0.63	YES	NO
152	36.87	31.55	0.86	YES	YES
137	37.32	29.96	0.8	YES	YES
138	36.75	26.64	0.73	YES	NO
139	37.24	29.07	0.78	YES	YES
140	36.95	27.55	0.75	YES	YES
143	36.35	24.38	0.67	YES	NO
144	36.10	23.32	0.65	YES	NO
147	36.70	25.15	0.69	YES	NO
148	35.67	22.47	0.63	YES	NO
127	19.66	18.37	0.92	YES	YES
128	38.40	34.78	0.9	YES	YES
129	38.27	33.76	0.88	YES	YES
132	34.82	29.57	0.85	YES	YES



Figure 16. 152-162 Burnt Ash Lane - Level 0 - DD levels in the proposed configuration



Figure 17. 152-162 Burnt Ash Lane - Level 1 - DD levels in the proposed configuration

Table 10. 152-162 Burnt Ash Lane - Daylight Distribution

Room Ref	Floor Ref	Existing DD value	Proposed DD value	Pr/Ex	Meets BRE criteria
4015	Level 0	95.93%	93.85%	0.98	YES
4016	Level 0	94.58%	93.94%	0.99	YES
4005	Level 01	98.42%	96.62%	0.98	YES
4006	Level 01	96.06%	96.91%	1.01	YES
4017	Level 01	98.20%	97.65%	0.99	YES
4018	Level 01	96.07%	97.14%	1.01	YES

Code naming conventions: GF-01-KLD

- Activity
- Unit number
- Level

Appendix B - Daylight Assessment: Assessment of the proposed development



Figure 18. Block A - Ground Floor

Table 11. Daylight Assessment: Average Daylight Factor -Block A - GF

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	Ground	1243	Kitchen Dining	0.39	2	NO	1.5	NO
Block A	Ground	1244	Living Room	2.28	1.5	YES	1.5	YES
Block A	Ground	1245	Kitchen Dining	0.48	2	NO	1.5	NO
Block A	Ground	1246	Living Room	1.74	1.5	YES	1.5	YES

Table 12. Daylight Assessment: No-Sky Line -Block A - GF

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth
Block A	Ground	1243	Kitchen Dining	25.79%	NO	YES
Block A	Ground	1244	Living Room	97.51%	YES	YES
Block A	Ground	1245	Kitchen Dining	31.65%	NO	YES
Block A	Ground	1246	Living Room	88.74%	YES	YES



Figure 19. Block A - First Floor

Table 13. Daylight Assessment: Average Daylight Factor -Block A - 1F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	First	1235	Bedroom	1.74	1	YES	1	YES
Block A	First	1236	Bedroom	0.99	1	NO	1	NO
Block A	First	1237	Bedroom	0.33	1	NO	1	NO
Block A	First	1252	Bedroom	2.34	1	YES	1	YES
Block A	First	1253	Bedroom	1.26	1	YES	1	YES
Block A	First	1254	Bedroom	1.04	1	YES	1	YES
Block A	First	1255	Bedroom	0.30	1	NO	1	NO
Block A	First	1347	Bedroom	1.07	1	YES	1	YES
Block A	First	1348	Bedroom	1.12	1	YES	1	YES
Block A	First	1349	Bedroom	1.10	1	YES	1	YES
Block A	First	1358	Kitchen Living Dining	1.55	2	NO	1.5	YES
Block A	First	1359	Kitchen Living Dining	3.39	2	YES	1.5	YES
Block A	First	1360	Kitchen Living Dining	3.34	2	YES	1.5	YES

Table 14. Daylight Assessment: No-Sky Line -Block A - 1F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth
Block A	First	1235	Bedroom	99.04%	YES	YES
Block A	First	1236	Bedroom	91.40%	YES	YES
Block A	First	1237	Bedroom	23.33%	NO	YES
Block A	First	1252	Bedroom	94.17%	YES	YES
Block A	First	1253	Bedroom	82.86%	YES	YES
Block A	First	1254	Bedroom	89.03%	YES	YES
Block A	First	1255	Bedroom	29.98%	NO	YES
Block A	First	1347	Bedroom	93.19%	YES	YES
Block A	First	1348	Bedroom	93.18%	YES	YES
Block A	First	1349	Bedroom	91.93%	YES	YES
Block A	First	1358	Kitchen Living Dining	89.22%	YES	YES
Block A	First	1359	Kitchen Living Dining	95.86%	YES	YES
Block A	First	1360	Kitchen Living Dining	94.49%	YES	YES



Figure 20. Block A - Second Floor

Table 15. Daylight Assessment: Average Daylight Factor -Block A - 2F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	Second	1053	Bedroom	1.12	1	YES	1	YES
Block A	Second	1054	Bedroom	1.16	1	YES	1	YES
Block A	Second	1055	Bedroom	1.14	1	YES	1	YES
Block A	Second	1064	Kitchen Living Dining	1.60	2	NO	1.5	YES
Block A	Second	1065	Kitchen Living Dining	3.50	2	YES	1.5	YES
Block A	Second	1066	Kitchen Living Dining	3.46	2	YES	1.5	YES
Block A	Second	1256	Bedroom	2.00	1	YES	1	YES
Block A	Second	1257	Bedroom	1.11	1	YES	1	YES
Block A	Second	1258	Living Room	3.89	1.5	YES	1.5	YES
Block A	Second	1259	Kitchen Dining	0.62	2	NO	1.5	NO
Block A	Second	1268	Bedroom	0.87	1	NO	1	NO
Block A	Second	1270	Kitchen Living Dining	2.17	2	YES	1.5	YES

Table 16. Daylight Assessment: No-Sky Line -Block A - 2F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth
Block A	Second	1053	Bedroom	93.25%	YES	YES
Block A	Second	1054	Bedroom	93.18%	YES	YES
Block A	Second	1055	Bedroom	91.93%	YES	YES
Block A	Second	1064	Kitchen Living Dining	89.92%	YES	YES
Block A	Second	1065	Kitchen Living Dining	96.47%	YES	YES
Block A	Second	1066	Kitchen Living Dining	95.76%	YES	YES
Block A	Second	1256	Bedroom	89.88%	YES	YES
Block A	Second	1257	Bedroom	92.74%	YES	YES
Block A	Second	1258	Living Room	98.49%	YES	YES
Block A	Second	1259	Kitchen Dining	37.98%	NO	YES
Block A	Second	1268	Bedroom	92.04%	YES	YES
Block A	Second	1270	Kitchen Living Dining	98.48%	YES	YES



Figure 21. Block A - Third Floor

Table 17. Daylight Assessment: Average Daylight Factor -Block A - 3F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	Third	1111	Bedroom	1.15	1	YES	1	YES
Block A	Third	1112	Bedroom	1.16	1	YES	1	YES
Block A	Third	1113	Bedroom	1.14	1	YES	1	YES
Block A	Third	1122	Kitchen Living Dining	1.60	2	NO	1.5	YES
Block A	Third	1123	Kitchen Living Dining	3.53	2	YES	1.5	YES
Block A	Third	1124	Kitchen Living Dining	3.52	2	YES	1.5	YES
Block A	Third	1272	Bedroom	2.05	1	YES	1	YES
Block A	Third	1273	Bedroom	1.13	1	YES	1	YES
Block A	Third	1274	Living Room	3.99	1.5	YES	1.5	YES
Block A	Third	1275	Kitchen Dining	0.63	1.5	NO	1.5	NO
Block A	Third	1281	Bedroom	0.88	1	NO	1	NO
Block A	Third	1283	Kitchen Living Dining	2.18	2	YES	1.5	YES

Table 18. Daylight Assessment: No-Sky Line -Block A - 3F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth
Block A	Third	1111	Bedroom	93.26%	YES	YES
Block A	Third	1112	Bedroom	93.18%	YES	YES
Block A	Third	1113	Bedroom	91.93%	YES	YES
Block A	Third	1122	Kitchen Living Dining	89.96%	YES	YES
Block A	Third	1123	Kitchen Living Dining	96.73%	YES	YES
Block A	Third	1124	Kitchen Living Dining	96.09%	YES	YES
Block A	Third	1272	Bedroom	89.88%	YES	YES
Block A	Third	1273	Bedroom	92.82%	YES	YES
Block A	Third	1274	Living Room	98.50%	YES	YES
Block A	Third	1275	Kitchen Dining	43.00%	NO	YES
Block A	Third	1281	Bedroom	92.04%	YES	YES
Block A	Third	1283	Kitchen Living Dining	98.42%	YES	YES



Figure 22. Block A - Fourth Floor

Table 19. Daylight Assessment: Average Daylight Factor -Block A - 4F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	Fourth	1140	Bedroom	1.16	1	YES	1	YES
Block A	Fourth	1141	Bedroom	1.16	1	YES	1	YES
Block A	Fourth	1142	Bedroom	1.14	1	YES	1	YES
Block A	Fourth	1151	Kitchen Living Dining	1.60	2	NO	1.5	YES
Block A	Fourth	1152	Kitchen Living Dining	3.53	2	YES	1.5	YES
Block A	Fourth	1153	Kitchen Living Dining	3.54	2	YES	1.5	YES
Block A	Fourth	1284	Bedroom	2.06	1	YES	1	YES
Block A	Fourth	1285	Bedroom	1.14	1	YES	1	YES
Block A	Fourth	1286	Living Room	4.03	1.5	YES	1.5	YES
Block A	Fourth	1287	Kitchen Dining	0.64	2	NO	1.5	NO
Block A	Fourth	1293	Bedroom	0.88	1	NO	1	NO
Block A	Fourth	1295	Kitchen Living Dining	2.18	2	YES	1.5	YES

Table 20. Daylight Assessment: No-Sky Line -Block A - 4F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth
Block A	Fourth	1140	Bedroom	93.26%	YES	YES
Block A	Fourth	1141	Bedroom	93.18%	YES	YES
Block A	Fourth	1142	Bedroom	91.93%	YES	YES
Block A	Fourth	1151	Kitchen Living Dining	89.96%	YES	YES
Block A	Fourth	1152	Kitchen Living Dining	96.73%	YES	YES
Block A	Fourth	1153	Kitchen Living Dining	96.41%	YES	YES
Block A	Fourth	1284	Bedroom	89.89%	YES	YES
Block A	Fourth	1285	Bedroom	92.85%	YES	YES
Block A	Fourth	1286	Living Room	98.50%	YES	YES
Block A	Fourth	1287	Kitchen Dining	44.03%	NO	YES
Block A	Fourth	1293	Bedroom	92.04%	YES	YES
Block A	Fourth	1295	Kitchen Living Dining	98.42%	YES	YES



Figure 23. Block A - Fifth Floor

Table 21. Daylight Assessment: Average Daylight Factor -Block A - 5F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	Fifth	1171	Bedroom	1.14	1	YES	1	YES
Block A	Fifth	1180	Kitchen Living Dining	1.62	2	NO	1.5	YES
Block A	Fifth	1296	Bedroom	2.06	1	YES	1	YES
Block A	Fifth	1297	Bedroom	1.14	1	YES	1	YES
Block A	Fifth	1298	Living Room	4.07	1.5	YES	1.5	YES
Block A	Fifth	1299	Kitchen Dining	0.66	2	NO	1.5	NO
Block A	Fifth	1305	Bedroom	0.88	1	NO	1	NO
Block A	Fifth	1307	Kitchen Living Dining	2.20	2	YES	1.5	YES

Table 22. Daylight Assessment: No-Sky Line -Block A - 5F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth
Block A	Fifth	1171	Bedroom	91.93%	YES	YES
Block A	Fifth	1180	Kitchen Living Dining	89.96%	YES	YES
Block A	Fifth	1296	Bedroom	89.89%	YES	YES
Block A	Fifth	1297	Bedroom	92.85%	YES	YES
Block A	Fifth	1298	Living Room	98.50%	YES	YES
Block A	Fifth	1299	Kitchen Dining	46.07%	NO	YES
Block A	Fifth	1305	Bedroom	92.04%	YES	YES
Block A	Fifth	1307	Kitchen Living Dining	98.42%	YES	YES



Figure 24. Block A - Sixth Floor

Table 23. Daylight Assessment: Average Daylight Factor -Block A - 6F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	Sixth	1196	Bedroom	1.14	1	YES	1	YES
Block A	Sixth	1199	Kitchen Living Dining	2.42	2	YES	1.5	YES
Block A	Sixth	1308	Bedroom	2.06	1	YES	1	YES
Block A	Sixth	1309	Bedroom	1.14	1	YES	1	YES
Block A	Sixth	1310	Living Room	4.11	1.5	YES	1.5	YES
Block A	Sixth	1311	Kitchen Dining	0.68	2	NO	1.5	NO
Block A	Sixth	1317	Bedroom	0.88	1	NO	1	NO
Block A	Sixth	1319	Kitchen Living Dining	2.22	2	YES	1.5	YES

Table 24. Daylight Assessment: No-Sky Line -Block A - 6F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block A	Sixth	1196	Bedroom	91.93%	YES	YES
Block A	Sixth	1199	Kitchen Living Dining	91.02%	YES	YES
Block A	Sixth	1308	Bedroom	89.89%	YES	YES
Block A	Sixth	1309	Bedroom	92.87%	YES	YES
Block A	Sixth	1310	Living Room	98.50%	YES	YES
Block A	Sixth	1311	Kitchen Dining	47.02%	NO	YES
Block A	Sixth	1317	Bedroom	92.04%	YES	YES
Block A	Sixth	1319	Kitchen Living Dining	98.42%	YES	YES



Figure 25. Block A - Seventh Floor

Table 25. Daylight Assessment: Average Daylight Factor -Block A - 7F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block A	Seventh	1213	Bedroom	1.14	1	YES	1	YES
Block A	Seventh	1216	Kitchen Living Dining	2.74	2	YES	1.5	YES
Block A	Seventh	1320	Bedroom	2.06	1	YES	1	YES
Block A	Seventh	1321	Bedroom	1.14	1	YES	1	YES
Block A	Seventh	1322	Living Room	4.16	1.5	YES	1.5	YES
Block A	Seventh	1323	Kitchen Dining	0.72	2	NO	1.5	NO
Block A	Seventh	1329	Bedroom	0.88	1	NO	1	NO
Block A	Seventh	1331	Kitchen Living Dining	2.25	2	YES	1.5	YES

Table 26. Daylight Assessment: No-Sky Line -Block A - 7F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block A	Seventh	1213	Bedroom	91.93%	YES	YES
Block A	Seventh	1216	Kitchen Living Dining	91.47%	YES	YES
Block A	Seventh	1320	Bedroom	89.89%	YES	YES
Block A	Seventh	1321	Bedroom	92.87%	YES	YES
Block A	Seventh	1322	Living Room	98.50%	YES	YES
Block A	Seventh	1323	Kitchen Dining	47.34%	NO	YES
Block A	Seventh	1329	Bedroom	92.06%	YES	YES
Block A	Seventh	1331	Kitchen Living Dining	98.42%	YES	YES

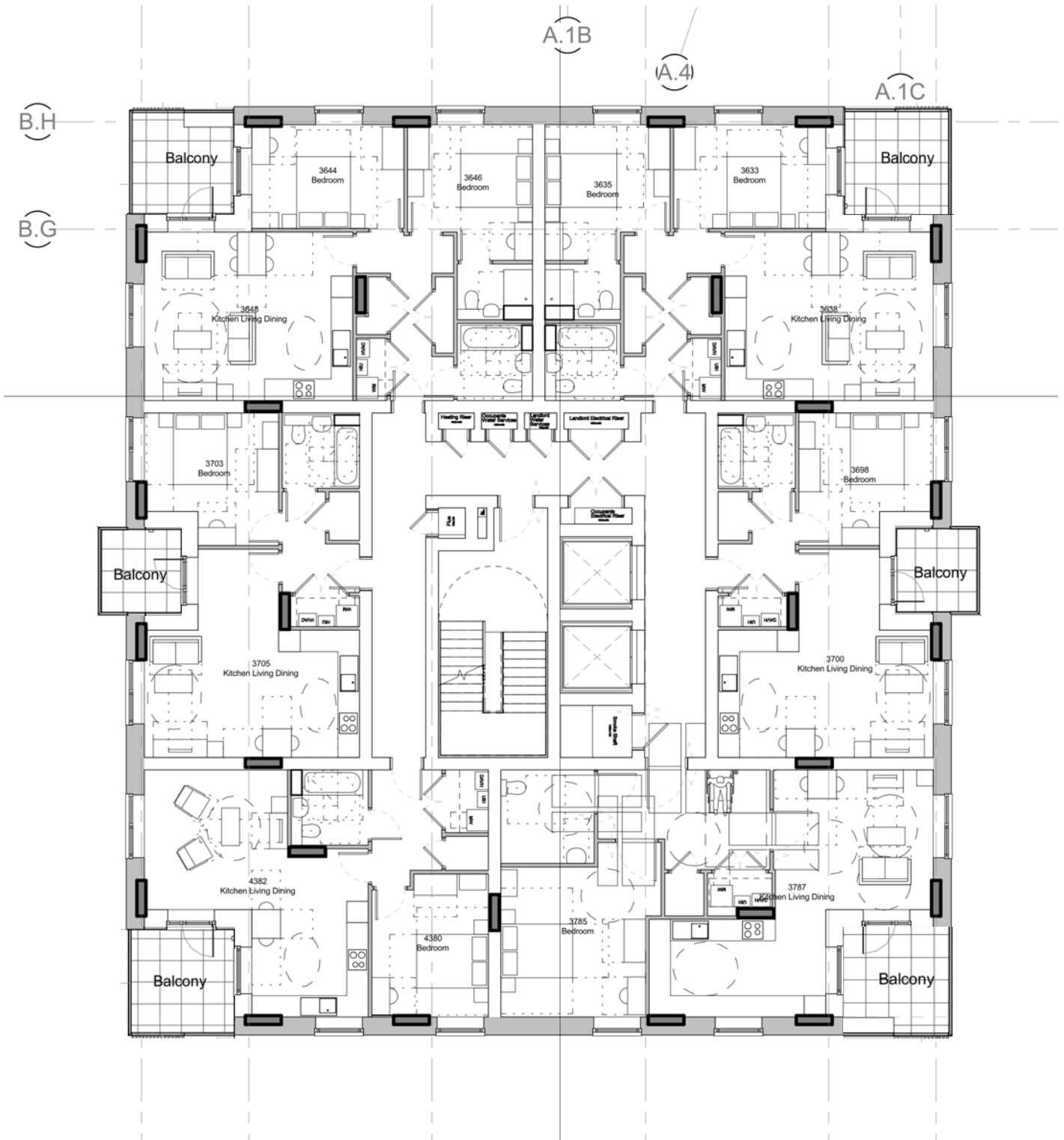


Figure 26. Block B - First Floor

Table 27. Daylight Assessment: Average Daylight Factor -Block B - 1F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	First	3633	Bedroom	1.92	1	YES	1	YES
Block B	First	3635	Bedroom	1.18	1	YES	1	YES
Block B	First	3638	Kitchen Living Dining	2.13	2	YES	1.5	YES
Block B	First	3644	Bedroom	1.9	1	YES	1	YES
Block B	First	3646	Bedroom	1.22	1	YES	1	YES
Block B	First	3648	Kitchen Living Dining	2	2	YES	1.5	YES
Block B	First	3698	Bedroom	3.0	1	YES	1	YES
Block B	First	3700	Kitchen Living Dining	2.12	2	YES	1.5	YES
Block B	First	3703	Bedroom	2.61	1	YES	1	YES
Block B	First	3705	Kitchen Living Dining	2	2	YES	1.5	YES
Block B	First	3785	Bedroom	0.77	1	NO	1	NO
Block B	First	3787	Kitchen Living Dining	2.56	2	YES	1.5	YES
Block B	First	4380	Bedroom	1.15	1	YES	1	YES
Block B	First	4382	Kitchen Living Dining	2.21	2	YES	1.5	YES

Table 28. Daylight Assessment: No-Sky Line -Block B - 1F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	First	3633	Bedroom	96.45%	YES	YES
Block B	First	3635	Bedroom	49.78%	NO	YES
Block B	First	3638	Kitchen Living Dining	98.07%	YES	YES
Block B	First	3644	Bedroom	96.10%	YES	YES
Block B	First	3646	Bedroom	61.26%	NO	YES
Block B	First	3648	Kitchen Living Dining	97.85%	YES	YES
Block B	First	3698	Bedroom	96.60%	YES	YES
Block B	First	3700	Kitchen Living Dining	98.82%	YES	YES
Block B	First	3703	Bedroom	96.48%	YES	YES
Block B	First	3705	Kitchen Living Dining	97.31%	YES	YES
Block B	First	3785	Bedroom	44.28%	NO	YES
Block B	First	3787	Kitchen Living Dining	98.00%	YES	YES
Block B	First	4380	Bedroom	40.96%	NO	YES
Block B	First	4382	Kitchen Living Dining	97.19%	YES	YES

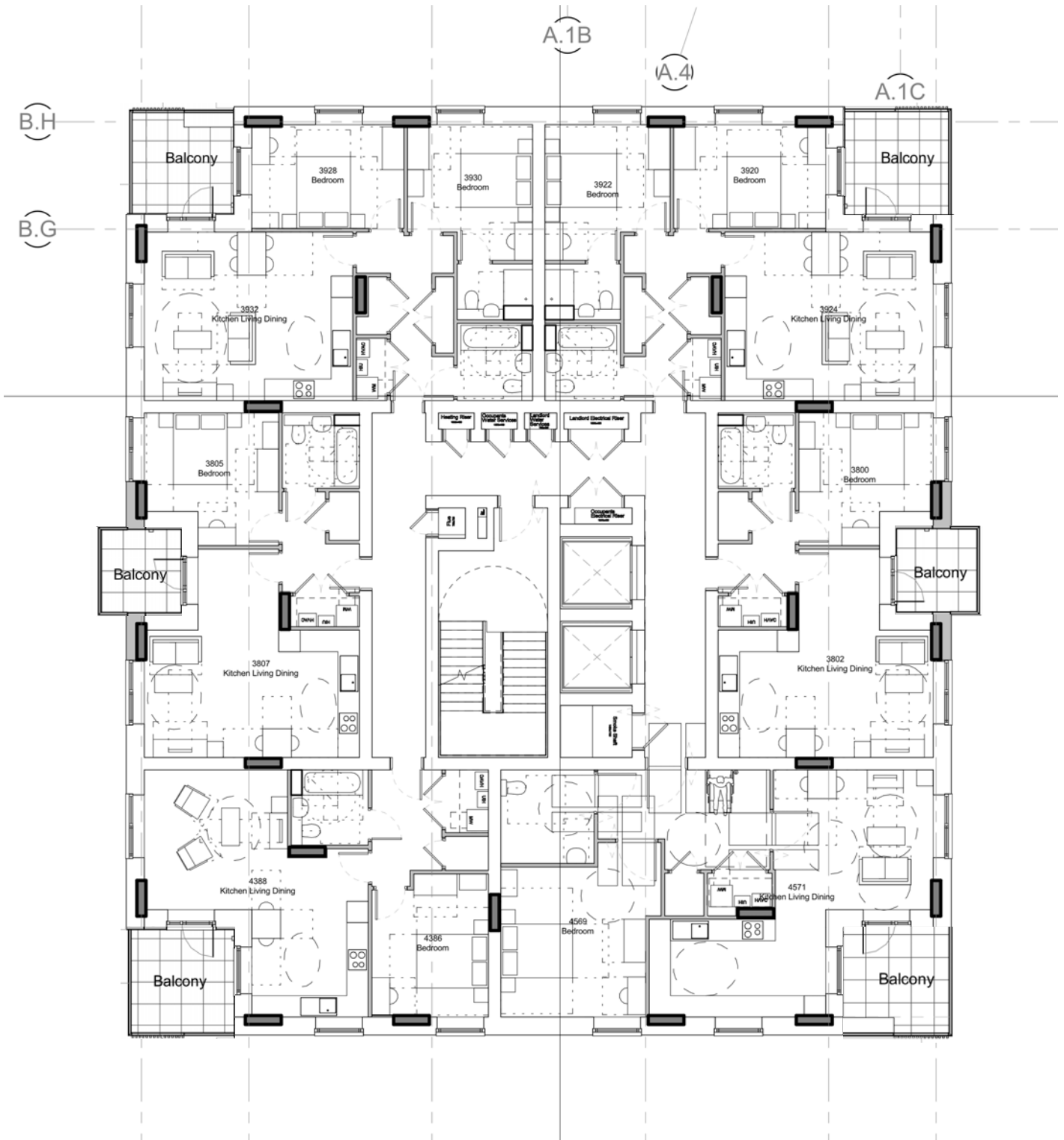


Figure 27. Block B - Second Floor

Table 29. Daylight Assessment: Average Daylight Factor -Block B - 2F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Second	3800	Bedroom	3.11	1	YES	1	YES
Block B	Second	3802	Kitchen Living Dining	2.21	2	YES	1.5	YES
Block B	Second	3805	Bedroom	2.74	1	YES	1	YES
Block B	Second	3807	Kitchen Living Dining	2	2	YES	1.5	YES
Block B	Second	3920	Bedroom	2.01	1	YES	1	YES
Block B	Second	3922	Bedroom	1.24	1	YES	1	YES
Block B	Second	3924	Kitchen Living Dining	2.22	2	YES	1.5	YES
Block B	Second	3928	Bedroom	2.04	1	YES	1	YES
Block B	Second	3930	Bedroom	1.29	1	YES	1	YES
Block B	Second	3932	Kitchen Living Dining	2.07	2	YES	1.5	YES
Block B	Second	4386	Bedroom	1.26	1	YES	1	YES
Block B	Second	4388	Kitchen Living Dining	2.37	2	YES	1.5	YES
Block B	Second	4569	Bedroom	1	1	YES	1	YES
Block B	Second	4571	Kitchen Living Dining	2.69	2	YES	1.5	YES

Table 30. Daylight Assessment: No-Sky Line -Block B - 2F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Second	3800	Bedroom	96.61%	YES	YES
Block B	Second	3802	Kitchen Living Dining	98.82%	YES	YES
Block B	Second	3805	Bedroom	96.50%	YES	YES
Block B	Second	3807	Kitchen Living Dining	97.91%	YES	YES
Block B	Second	3920	Bedroom	96.47%	YES	YES
Block B	Second	3922	Bedroom	49.78%	NO	YES
Block B	Second	3924	Kitchen Living Dining	97.95%	YES	YES
Block B	Second	3928	Bedroom	95.91%	YES	YES
Block B	Second	3930	Bedroom	61.51%	NO	YES
Block B	Second	3932	Kitchen Living Dining	98.05%	YES	YES
Block B	Second	4386	Bedroom	41.23%	NO	YES
Block B	Second	4388	Kitchen Living Dining	97.22%	YES	YES
Block B	Second	4569	Bedroom	44.36%	NO	YES
Block B	Second	4571	Kitchen Living Dining	97.94%	YES	YES

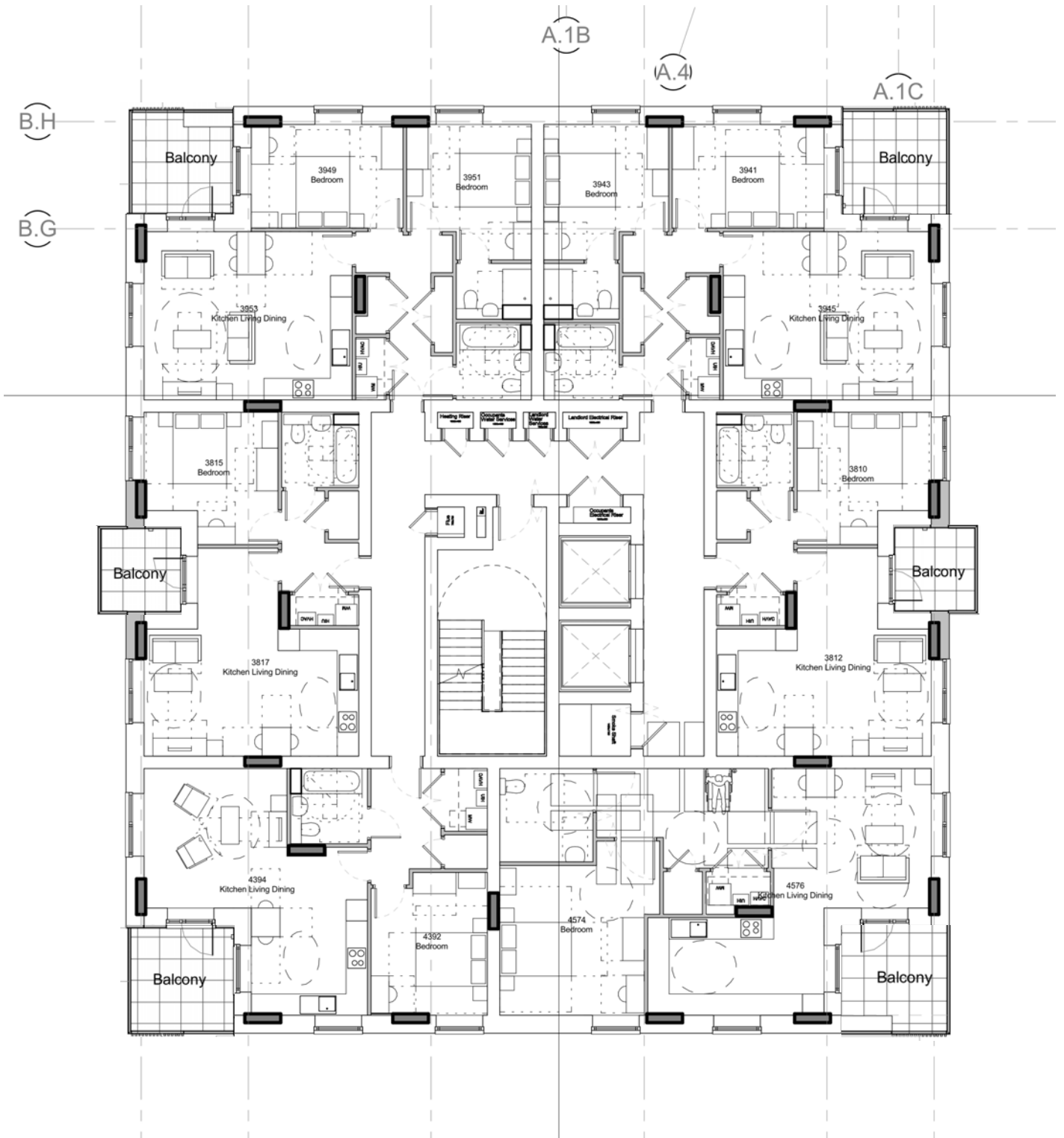


Figure 28. Block B - Third Floor

Table 31. Daylight Assessment: Average Daylight Factor -Block B - 3F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Third	3810	Bedroom	3.14	1	YES	1	YES
Block B	Third	3812	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Third	3815	Bedroom	2.85	1	YES	1	YES
Block B	Third	3817	Kitchen Living Dining	2.0	2	YES	1.5	YES
Block B	Third	3941	Bedroom	2.17	1	YES	1	YES
Block B	Third	3943	Bedroom	1.29	1	YES	1	YES
Block B	Third	3945	Kitchen Living Dining	2.24	2	YES	1.5	YES
Block B	Third	3949	Bedroom	2.15	1	YES	1	YES
Block B	Third	3951	Bedroom	1.35	1	YES	1	YES
Block B	Third	3953	Kitchen Living Dining	2.16	2	YES	1.5	YES
Block B	Third	4392	Bedroom	1.28	1	YES	1	YES
Block B	Third	4394	Kitchen Living Dining	2.52	2	YES	1.5	YES
Block B	Third	4574	Bedroom	1	1	YES	1	YES
Block B	Third	4576	Kitchen Living Dining	2.75	2	YES	1.5	YES

Table 32. Daylight Assessment: No-Sky Line -Block B - 3F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Third	3810	Bedroom	96.61%	YES	YES
Block B	Third	3812	Kitchen Living Dining	98.82%	YES	YES
Block B	Third	3815	Bedroom	96.50%	YES	YES
Block B	Third	3817	Kitchen Living Dining	98.54%	YES	YES
Block B	Third	3941	Bedroom	96.47%	YES	YES
Block B	Third	3943	Bedroom	49.80%	NO	YES
Block B	Third	3945	Kitchen Living Dining	97.95%	YES	YES
Block B	Third	3949	Bedroom	95.91%	YES	YES
Block B	Third	3951	Bedroom	61.52%	NO	YES
Block B	Third	3953	Kitchen Living Dining	98.40%	YES	YES
Block B	Third	4392	Bedroom	41.93%	NO	YES
Block B	Third	4394	Kitchen Living Dining	97.33%	YES	YES
Block B	Third	4574	Bedroom	44.60%	NO	YES
Block B	Third	4576	Kitchen Living Dining	97.95%	YES	YES

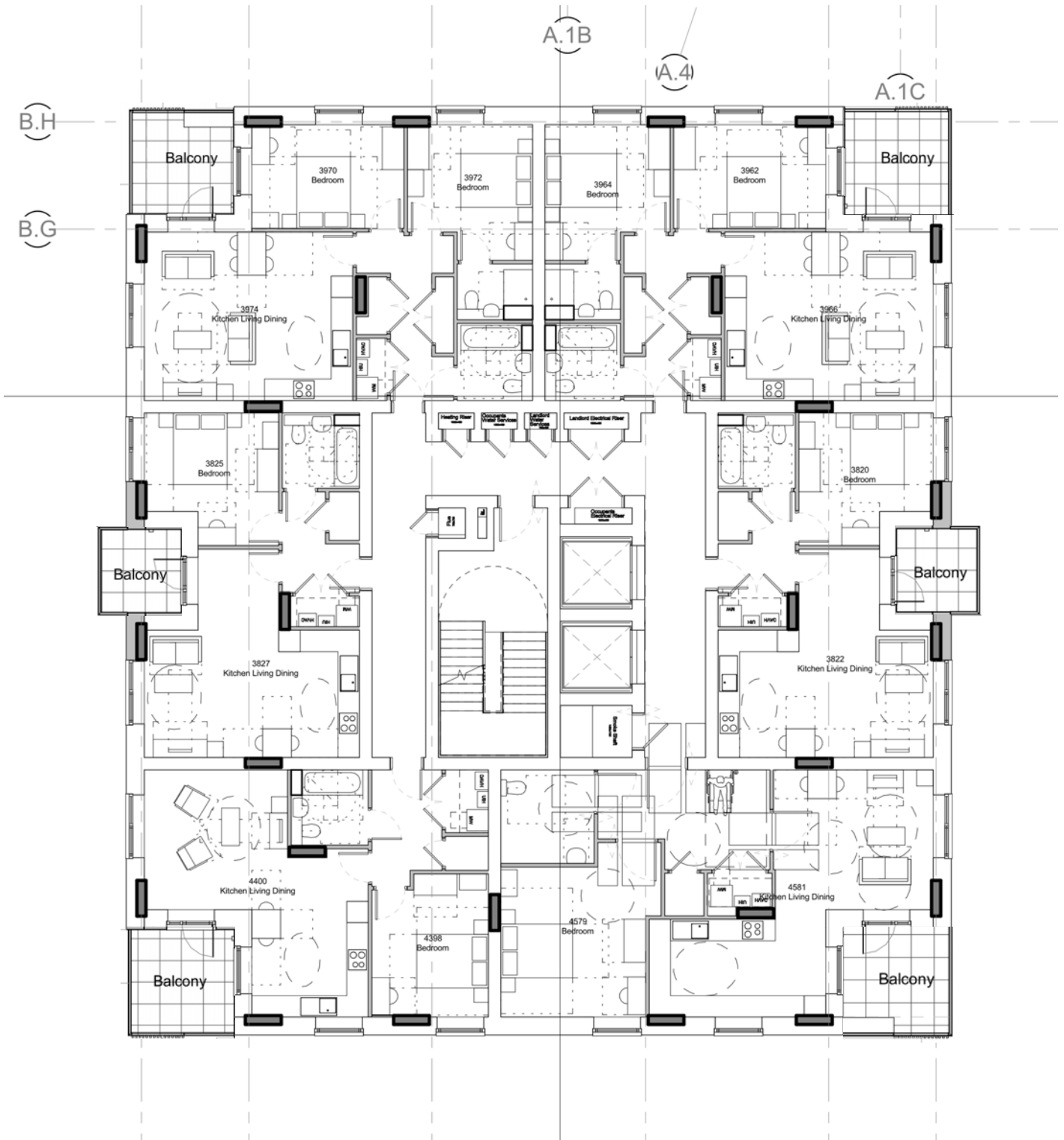


Figure 29. Block B - Fourth Floor

Table 33. Daylight Assessment: Average Daylight Factor -Block B - 4F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Fourth	3820	Bedroom	3.14	1	YES	1	YES
Block B	Fourth	3822	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Fourth	3825	Bedroom	2.93	1	YES	1	YES
Block B	Fourth	3827	Kitchen Living Dining	2.05	2	YES	1.5	YES
Block B	Fourth	3962	Bedroom	2.12	1	YES	1	YES
Block B	Fourth	3964	Bedroom	1.36	1	YES	1	YES
Block B	Fourth	3966	Kitchen Living Dining	2.24	2	YES	1.5	YES
Block B	Fourth	3970	Bedroom	2.22	1	YES	1	YES
Block B	Fourth	3972	Bedroom	1.42	1	YES	1	YES
Block B	Fourth	3974	Kitchen Living Dining	2.21	2	YES	1.5	YES
Block B	Fourth	4398	Bedroom	1.53	1	YES	1	YES
Block B	Fourth	4400	Kitchen Living Dining	2.66	2	YES	1.5	YES
Block B	Fourth	4579	Bedroom	1.03	1	YES	1	YES
Block B	Fourth	4581	Kitchen Living Dining	2.79	2	YES	1.5	YES

Table 34. Daylight Assessment: No-Sky Line -Block B - 4F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Fourth	3820	Bedroom	96.61%	YES	YES
Block B	Fourth	3822	Kitchen Living Dining	98.82%	YES	YES
Block B	Fourth	3825	Bedroom	96.50%	YES	YES
Block B	Fourth	3827	Kitchen Living Dining	98.65%	YES	YES
Block B	Fourth	3962	Bedroom	96.47%	YES	YES
Block B	Fourth	3964	Bedroom	49.89%	NO	YES
Block B	Fourth	3966	Kitchen Living Dining	97.95%	YES	YES
Block B	Fourth	3970	Bedroom	95.91%	YES	YES
Block B	Fourth	3972	Bedroom	61.63%	NO	YES
Block B	Fourth	3974	Kitchen Living Dining	98.41%	YES	YES
Block B	Fourth	4398	Bedroom	43.91%	NO	YES
Block B	Fourth	4400	Kitchen Living Dining	97.33%	YES	YES
Block B	Fourth	4579	Bedroom	45.75%	NO	YES
Block B	Fourth	4581	Kitchen Living Dining	97.95%	YES	YES

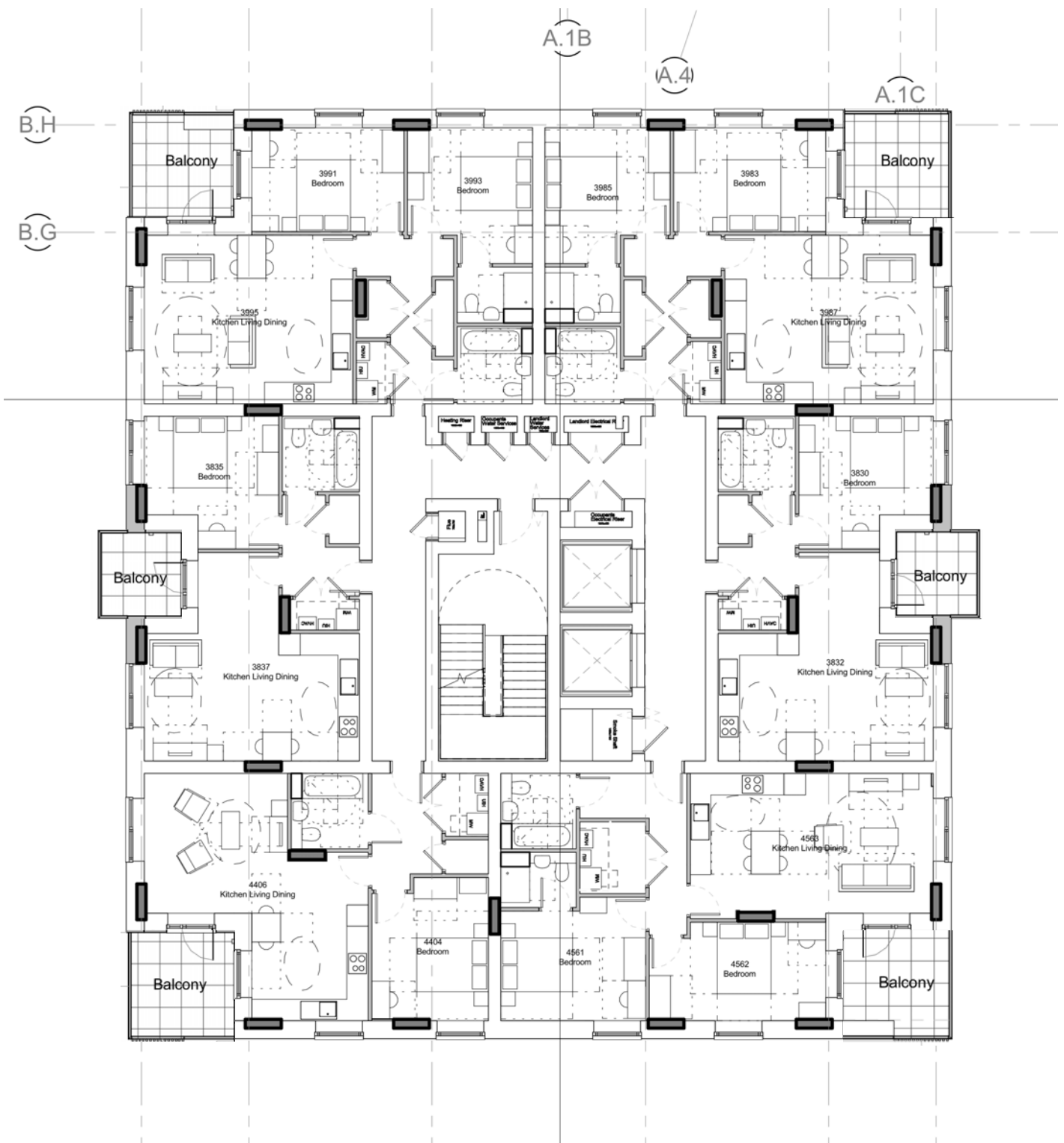


Figure 30. Block B - Fifth Floor

Table 35. Daylight Assessment: Average Daylight Factor -Block B - 5F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Fifth	3830	Bedroom	3.14	1	YES	1	YES
Block B	Fifth	3832	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Fifth	3835	Bedroom	3.0	1	YES	1	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Fifth	3837	Kitchen Living Dining	2.10	2	YES	1.5	YES
Block B	Fifth	3983	Bedroom	2.19	1	YES	1	YES
Block B	Fifth	3985	Bedroom	1.46	1	YES	1	YES
Block B	Fifth	3987	Kitchen Living Dining	2.25	2	YES	1.5	YES
Block B	Fifth	3991	Bedroom	2.28	1	YES	1	YES
Block B	Fifth	3993	Bedroom	1.51	1	YES	1	YES
Block B	Fifth	3995	Kitchen Living Dining	2.24	2	YES	1.5	YES
Block B	Fifth	4404	Bedroom	1.72	1	YES	1	YES
Block B	Fifth	4406	Kitchen Living Dining	2.84	2	YES	1.5	YES
Block B	Fifth	4561	Bedroom	1.61	1	YES	1	YES
Block B	Fifth	4562	Bedroom	2.21	1	YES	1	YES
Block B	Fifth	4563	Kitchen Living Dining	2.23	2	YES	1.5	YES

Table 36. Daylight Assessment: No-Sky Line -Block B - 5F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Fifth	3830	Bedroom	96.61%	YES	YES
Block B	Fifth	3832	Kitchen Living Dining	98.79%	YES	YES
Block B	Fifth	3835	Bedroom	96.50%	YES	YES
Block B	Fifth	3837	Kitchen Living Dining	98.70%	YES	YES
Block B	Fifth	3983	Bedroom	96.47%	YES	YES
Block B	Fifth	3985	Bedroom	50.45%	NO	YES
Block B	Fifth	3987	Kitchen Living Dining	97.95%	YES	YES
Block B	Fifth	3991	Bedroom	95.91%	YES	YES
Block B	Fifth	3993	Bedroom	62.33%	NO	YES
Block B	Fifth	3995	Kitchen Living Dining	98.41%	YES	YES
Block B	Fifth	4404	Bedroom	50.10%	NO	YES
Block B	Fifth	4406	Kitchen Living Dining	97.33%	YES	YES
Block B	Fifth	4561	Bedroom	62.68%	NO	YES
Block B	Fifth	4562	Bedroom	97.16%	YES	YES
Block B	Fifth	4563	Kitchen Living Dining	98.72%	YES	YES

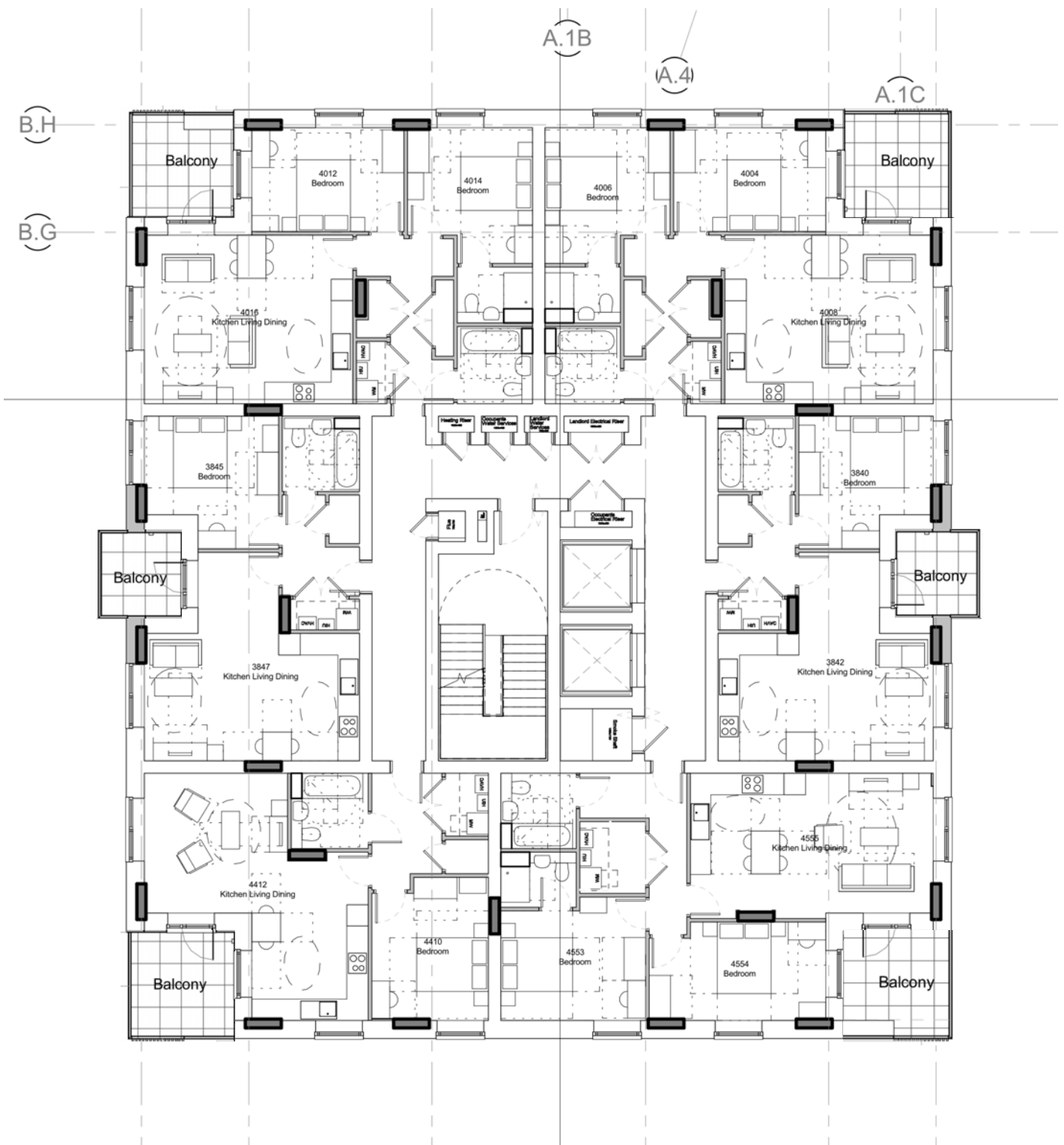


Figure 31. Block B - Sixth Floor

Table 37. Daylight Assessment: Average Daylight Factor -Block B - 6F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Sixth	3840	Bedroom	3.14	1	YES	1	YES
Block B	Sixth	3842	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Sixth	3845	Bedroom	3.04	1	YES	1	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Sixth	3847	Kitchen Living Dining	2.15	2	YES	1.5	YES
Block B	Sixth	4004	Bedroom	2.29	1	YES	1	YES
Block B	Sixth	4006	Bedroom	1.59	1	YES	1	YES
Block B	Sixth	4008	Kitchen Living Dining	2.25	2	YES	1.5	YES
Block B	Sixth	4012	Bedroom	2.38	1	YES	1	YES
Block B	Sixth	4014	Bedroom	1.64	1	YES	1	YES
Block B	Sixth	4016	Kitchen Living Dining	2.26	2	YES	1.5	YES
Block B	Sixth	4410	Bedroom	1.94	1	YES	1	YES
Block B	Sixth	4412	Kitchen Living Dining	3.09	2	YES	1.5	YES
Block B	Sixth	4553	Bedroom	1.85	1	YES	1	YES
Block B	Sixth	4554	Bedroom	2.38	1	YES	1	YES
Block B	Sixth	4555	Kitchen Living Dining	2.26	2	YES	1.5	YES

Table 38. Daylight Assessment: No-Sky Line -Block B - 6F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Sixth	3840	Bedroom	96.61%	YES	YES
Block B	Sixth	3842	Kitchen Living Dining	98.79%	YES	YES
Block B	Sixth	3845	Bedroom	96.50%	YES	YES
Block B	Sixth	3847	Kitchen Living Dining	98.87%	YES	YES
Block B	Sixth	4004	Bedroom	96.47%	YES	YES
Block B	Sixth	4006	Bedroom	52.77%	NO	YES
Block B	Sixth	4008	Kitchen Living Dining	97.95%	YES	YES
Block B	Sixth	4012	Bedroom	95.91%	YES	YES
Block B	Sixth	4014	Bedroom	64.82%	NO	YES
Block B	Sixth	4016	Kitchen Living Dining	98.41%	YES	YES
Block B	Sixth	4410	Bedroom	80.37%	YES	YES
Block B	Sixth	4412	Kitchen Living Dining	97.99%	YES	YES
Block B	Sixth	4553	Bedroom	86.74%	YES	YES
Block B	Sixth	4554	Bedroom	97.32%	YES	YES
Block B	Sixth	4555	Kitchen Living Dining	98.72%	YES	YES

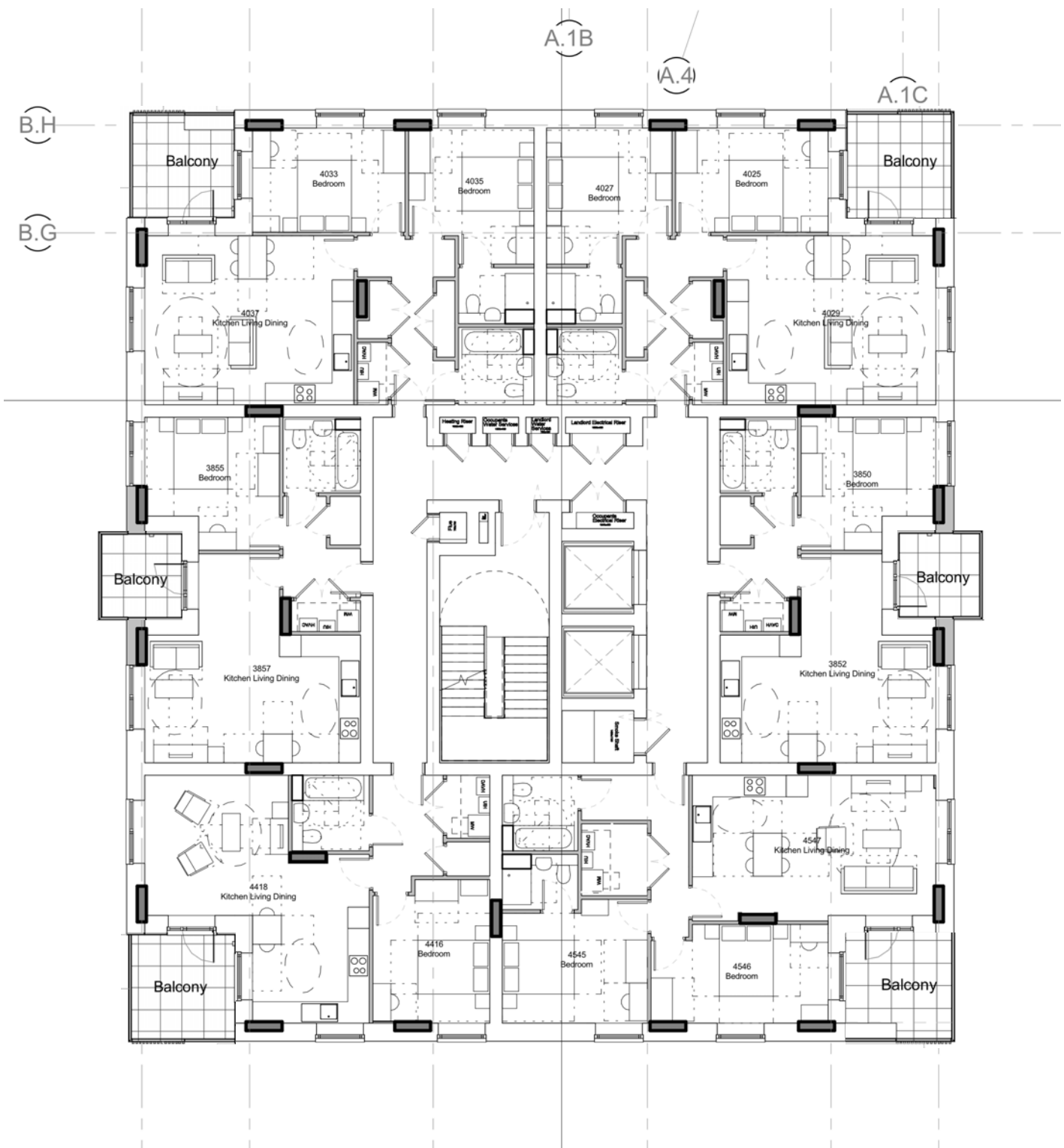


Figure 32. Block B - Seventh Floor

Table 39. Daylight Assessment: Average Daylight Factor -Block B - 7F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Seventh	3850	Bedroom	3.14	1	YES	1	YES
Block B	Seventh	3852	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Seventh	3855	Bedroom	3.10	1	YES	1	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Seventh	3857	Kitchen Living Dining	2.20	2	YES	1.5	YES
Block B	Seventh	4025	Bedroom	2.43	1	YES	1	YES
Block B	Seventh	4027	Bedroom	1.79	1	YES	1	YES
Block B	Seventh	4029	Kitchen Living Dining	2.26	2	YES	1.5	YES
Block B	Seventh	4033	Bedroom	2.50	1	YES	1	YES
Block B	Seventh	4035	Bedroom	1.83	1	YES	1	YES
Block B	Seventh	4037	Kitchen Living Dining	2.30	2	YES	1.5	YES
Block B	Seventh	4416	Bedroom	2.23	1	YES	1	YES
Block B	Seventh	4418	Kitchen Living Dining	3.34	2	YES	1.5	YES
Block B	Seventh	4545	Bedroom	2.13	1	YES	1	YES
Block B	Seventh	4546	Bedroom	2.57	1	YES	1	YES
Block B	Seventh	4547	Kitchen Living Dining	2.32	2	YES	1.5	YES

Table 40. Daylight Assessment: No-Sky Line -Block B - 7F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Seventh	3850	Bedroom	96.61%	YES	YES
Block B	Seventh	3852	Kitchen Living Dining	98.79%	YES	YES
Block B	Seventh	3855	Bedroom	96.50%	YES	YES
Block B	Seventh	3857	Kitchen Living Dining	98.88%	YES	YES
Block B	Seventh	4025	Bedroom	96.47%	YES	YES
Block B	Seventh	4027	Bedroom	61.36%	NO	YES
Block B	Seventh	4029	Kitchen Living Dining	97.95%	YES	YES
Block B	Seventh	4033	Bedroom	95.91%	YES	YES
Block B	Seventh	4035	Bedroom	73.57%	NO	YES
Block B	Seventh	4037	Kitchen Living Dining	98.45%	YES	YES
Block B	Seventh	4416	Bedroom	95.81%	YES	YES
Block B	Seventh	4418	Kitchen Living Dining	98.01%	YES	YES
Block B	Seventh	4545	Bedroom	89.87%	YES	YES
Block B	Seventh	4546	Bedroom	97.32%	YES	YES
Block B	Seventh	4547	Kitchen Living Dining	98.86%	YES	YES

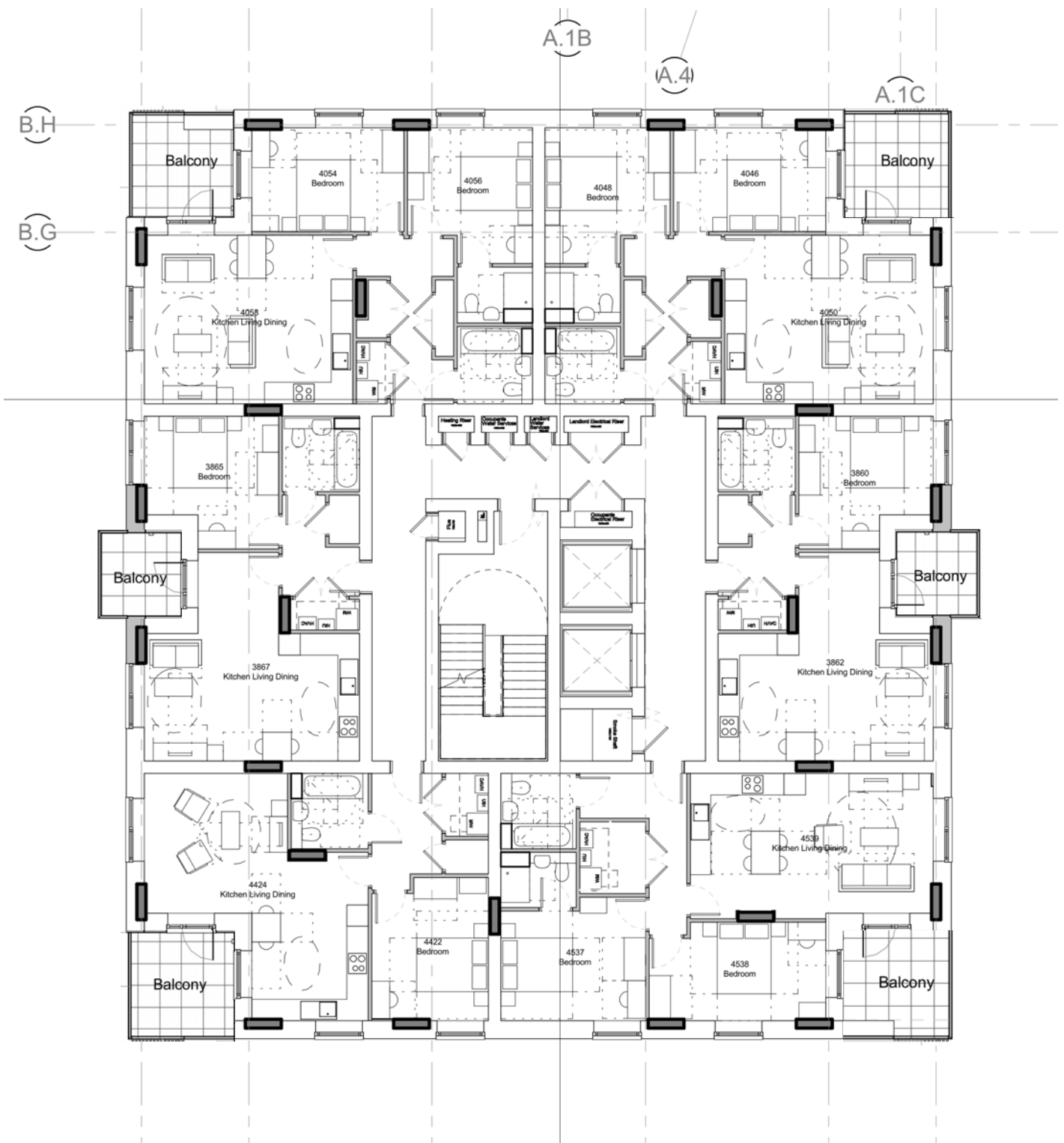


Figure 33. Block B - Eighth Floor

Table 41. Daylight Assessment: Average Daylight Factor -Block B - 8F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Eighth	3860	Bedroom	3.14	1	YES	1	YES
Block B	Eighth	3862	Kitchen Living Dining	2.23	2	YES	1.5	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Eighth	3865	Bedroom	3.14	1	YES	1	YES
Block B	Eighth	3867	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Eighth	4046	Bedroom	2.61	1	YES	1	YES
Block B	Eighth	4048	Bedroom	2.04	1	YES	1	YES
Block B	Eighth	4050	Kitchen Living Dining	2.30	2	YES	1.5	YES
Block B	Eighth	4054	Bedroom	2.66	1	YES	1	YES
Block B	Eighth	4056	Bedroom	2.06	1	YES	1	YES
Block B	Eighth	4058	Kitchen Living Dining	2.34	2	YES	1.5	YES
Block B	Eighth	4422	Bedroom	2.39	1	YES	1	YES
Block B	Eighth	4424	Kitchen Living Dining	3.49	2	YES	1.5	YES
Block B	Eighth	4537	Bedroom	2.29	1	YES	1	YES
Block B	Eighth	4538	Bedroom	2.67	1	YES	1	YES
Block B	Eighth	4539	Kitchen Living Dining	2.34	2	YES	1.5	YES

Table 42. Daylight Assessment: No-Sky Line -Block B - 8F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Eighth	3860	Bedroom	96.61%	YES	YES
Block B	Eighth	3862	Kitchen Living Dining	98.79%	YES	YES
Block B	Eighth	3865	Bedroom	96.50%	YES	YES
Block B	Eighth	3867	Kitchen Living Dining	98.88%	YES	YES
Block B	Eighth	4046	Bedroom	97.24%	YES	YES
Block B	Eighth	4048	Bedroom	96.60%	YES	YES
Block B	Eighth	4050	Kitchen Living Dining	98.66%	YES	YES
Block B	Eighth	4054	Bedroom	97.19%	YES	YES
Block B	Eighth	4056	Bedroom	96.58%	YES	YES
Block B	Eighth	4058	Kitchen Living Dining	99.21%	YES	YES
Block B	Eighth	4422	Bedroom	95.81%	YES	YES
Block B	Eighth	4424	Kitchen Living Dining	98.01%	YES	YES
Block B	Eighth	4537	Bedroom	89.87%	YES	YES
Block B	Eighth	4538	Bedroom	97.32%	YES	YES
Block B	Eighth	4539	Kitchen Living Dining	98.86%	YES	YES

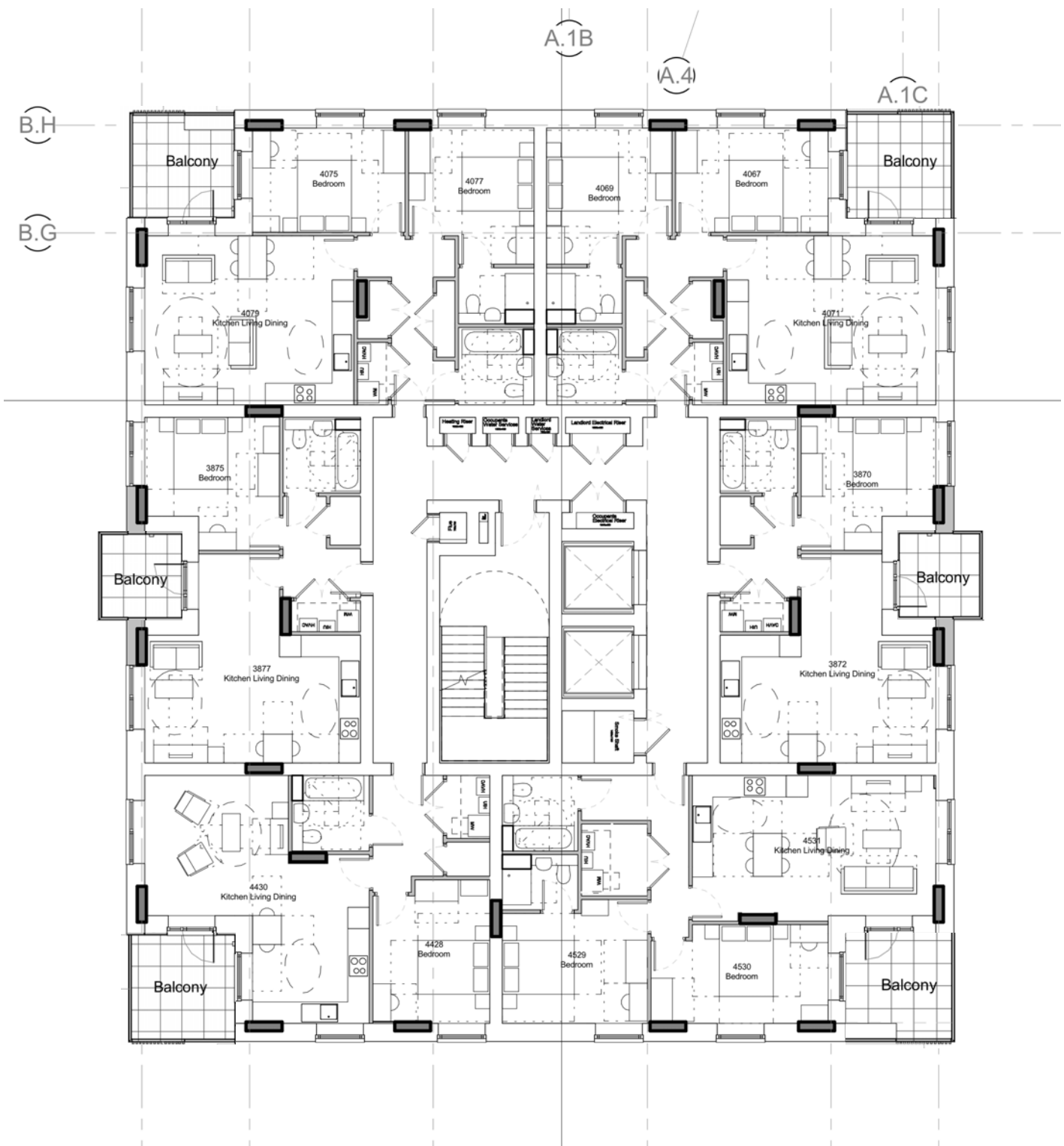


Figure 34. Block B - Ninth Floor

Table 43. Daylight Assessment: Average Daylight Factor -Block B - 9F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Ninth	3870	Bedroom	3.14	1	YES	1	YES
Block B	Ninth	3872	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Ninth	3875	Bedroom	3.14	1	YES	1	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Ninth	3877	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Ninth	4067	Bedroom	2.8	1	YES	1	YES
Block B	Ninth	4069	Bedroom	2.32	1	YES	1	YES
Block B	Ninth	4071	Kitchen Living Dining	2.36	2	YES	1.5	YES
Block B	Ninth	4075	Bedroom	2.8	1	YES	1	YES
Block B	Ninth	4077	Bedroom	2.32	1	YES	1	YES
Block B	Ninth	4079	Kitchen Living Dining	2.36	2	YES	1.5	YES
Block B	Ninth	4428	Bedroom	2.39	1	YES	1	YES
Block B	Ninth	4430	Kitchen Living Dining	3.49	2	YES	1.5	YES
Block B	Ninth	4529	Bedroom	2.29	1	YES	1	YES
Block B	Ninth	4530	Bedroom	2.67	1	YES	1	YES
Block B	Ninth	4531	Kitchen Living Dining	2.34	2	YES	1.5	YES

Table 44. Daylight Assessment: No-Sky Line -Block B - 9F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Ninth	3870	Bedroom	96.61%	YES	YES
Block B	Ninth	3872	Kitchen Living Dining	98.79%	YES	YES
Block B	Ninth	3875	Bedroom	96.50%	YES	YES
Block B	Ninth	3877	Kitchen Living Dining	98.88%	YES	YES
Block B	Ninth	4067	Bedroom	97.24%	YES	YES
Block B	Ninth	4069	Bedroom	96.60%	YES	YES
Block B	Ninth	4071	Kitchen Living Dining	99.13%	YES	YES
Block B	Ninth	4075	Bedroom	97.19%	YES	YES
Block B	Ninth	4077	Bedroom	96.58%	YES	YES
Block B	Ninth	4079	Kitchen Living Dining	99.21%	YES	YES
Block B	Ninth	4428	Bedroom	95.81%	YES	YES
Block B	Ninth	4430	Kitchen Living Dining	98.01%	YES	YES
Block B	Ninth	4529	Bedroom	89.87%	YES	YES
Block B	Ninth	4530	Bedroom	97.32%	YES	YES
Block B	Ninth	4531	Kitchen Living Dining	98.86%	YES	YES

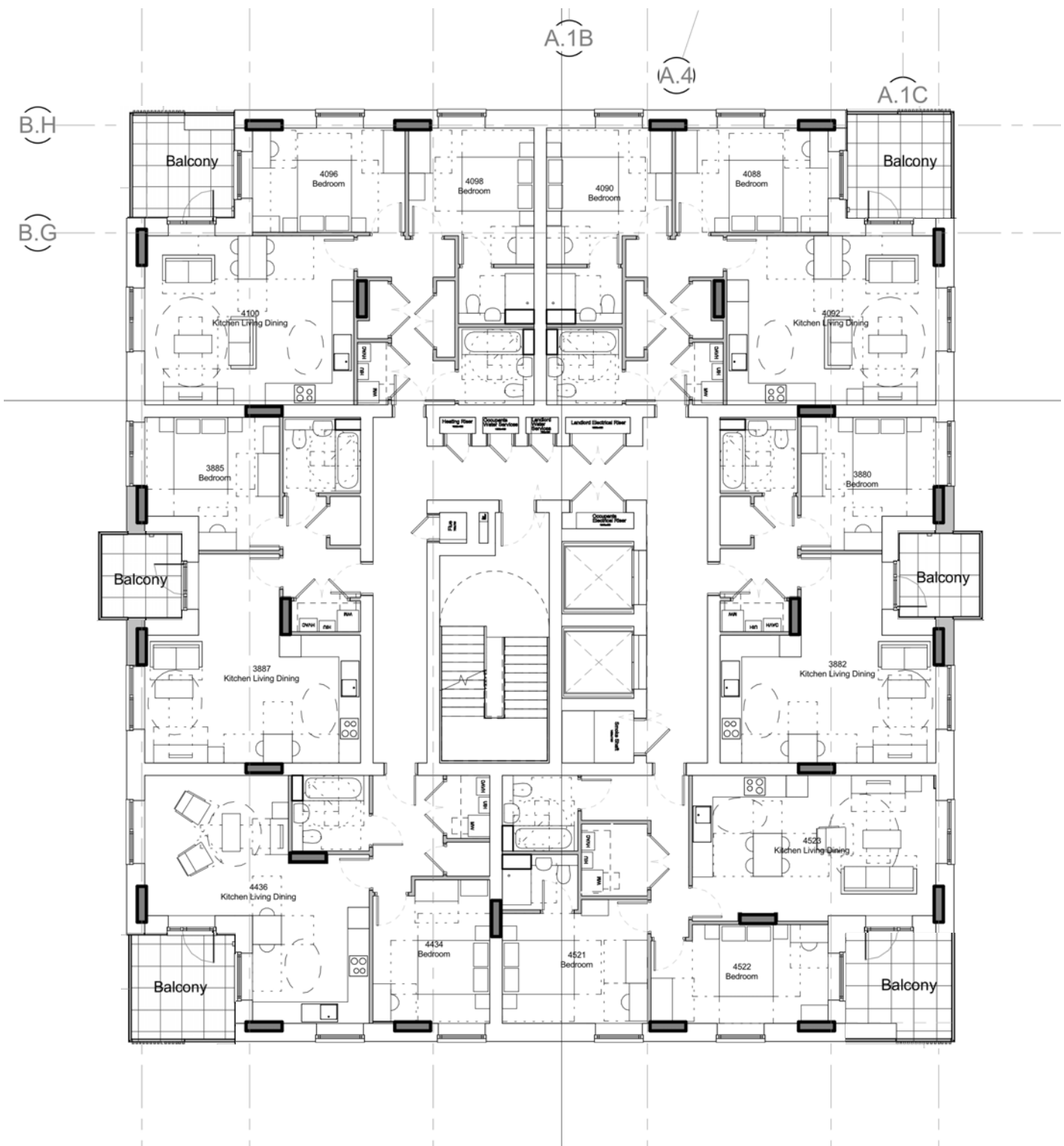


Figure 35. Block B - Tenth Floor

Table 45. Daylight Assessment: Average Daylight Factor -Block B - 10F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Tenth	3880	Bedroom	3.34	1	YES	1	YES
Block B	Tenth	3882	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Tenth	3885	Bedroom	3.34	1	YES	1	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Tenth	3887	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Tenth	4088	Bedroom	2.86	1	YES	1	YES
Block B	Tenth	4090	Bedroom	2.42	1	YES	1	YES
Block B	Tenth	4092	Kitchen Living Dining	2.37	2	YES	1.5	YES
Block B	Tenth	4096	Bedroom	2.86	1	YES	1	YES
Block B	Tenth	4098	Bedroom	2.42	1	YES	1	YES
Block B	Tenth	4100	Kitchen Living Dining	2.37	2	YES	1.5	YES
Block B	Tenth	4434	Bedroom	2.39	1	YES	1	YES
Block B	Tenth	4436	Kitchen Living Dining	3.49	2	YES	1.5	YES
Block B	Tenth	4521	Bedroom	2.29	1	YES	1	YES
Block B	Tenth	4522	Bedroom	2.67	1	YES	1	YES
Block B	Tenth	4523	Kitchen Living Dining	2.34	2	YES	1.5	YES

Table 46. Daylight Assessment: No-Sky Line -Block B - 10F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Tenth	3880	Bedroom	96.61%	YES	YES
Block B	Tenth	3882	Kitchen Living Dining	98.79%	YES	YES
Block B	Tenth	3885	Bedroom	96.50%	YES	YES
Block B	Tenth	3887	Kitchen Living Dining	98.88%	YES	YES
Block B	Tenth	4088	Bedroom	97.24%	YES	YES
Block B	Tenth	4090	Bedroom	96.60%	YES	YES
Block B	Tenth	4092	Kitchen Living Dining	99.13%	YES	YES
Block B	Tenth	4096	Bedroom	97.19%	YES	YES
Block B	Tenth	4098	Bedroom	96.58%	YES	YES
Block B	Tenth	4100	Kitchen Living Dining	99.21%	YES	YES
Block B	Tenth	4434	Bedroom	95.81%	YES	YES
Block B	Tenth	4436	Kitchen Living Dining	98.01%	YES	YES
Block B	Tenth	4521	Bedroom	89.87%	YES	YES
Block B	Tenth	4522	Bedroom	97.32%	YES	YES
Block B	Tenth	4523	Kitchen Living Dining	98.86%	YES	YES

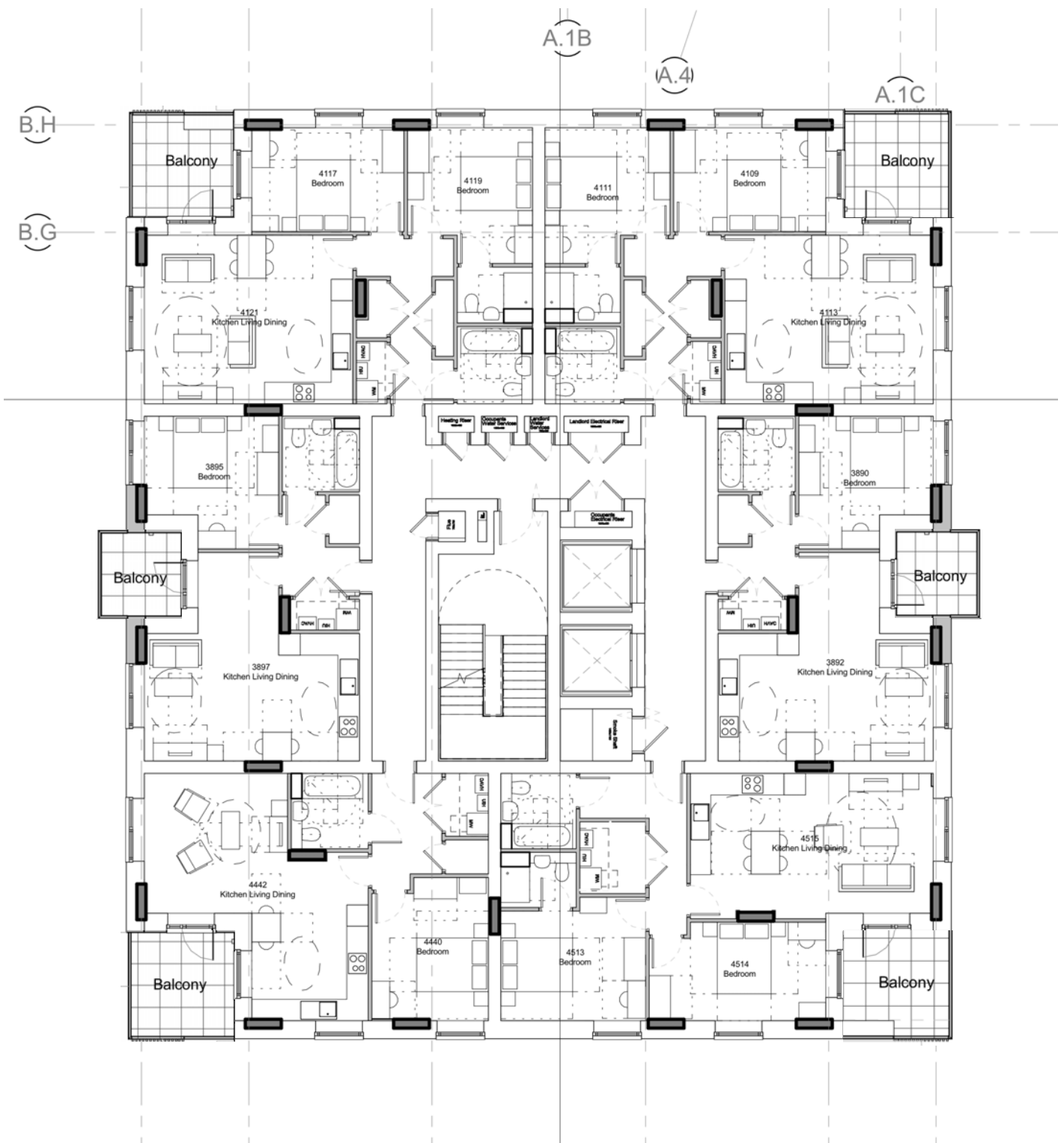


Figure 36. Block B - Eleventh Floor

Table 47. Daylight Assessment: Average Daylight Factor -Block B - 11F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Eleventh	3890	Bedroom	3.14	1	YES	1	YES
Block B	Eleventh	3892	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Eleventh	3895	Bedroom	3.14	1	YES	1	YES

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Eleventh	3897	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Eleventh	4109	Bedroom	2.86	1	YES	1	YES
Block B	Eleventh	4111	Bedroom	2.42	1	YES	1	YES
Block B	Eleventh	4113	Kitchen Living Dining	2.57	2	YES	1.5	YES
Block B	Eleventh	4117	Bedroom	2.86	1	YES	1	YES
Block B	Eleventh	4119	Bedroom	2.42	1	YES	1	YES
Block B	Eleventh	4121	Kitchen Living Dining	2.57	2	YES	1.5	YES
Block B	Eleventh	4440	Bedroom	2.29	1	YES	1	YES
Block B	Eleventh	4442	Kitchen Living Dining	3.49	2	YES	1.5	YES
Block B	Eleventh	4513	Bedroom	2.29	1	YES	1	YES
Block B	Eleventh	4514	Bedroom	2.67	1	YES	1	YES
Block B	Eleventh	4515	Kitchen Living Dining	2.24	2	YES	1.5	YES

Table 48. Daylight Assessment: No-Sky Line -Block B - 11F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Eleventh	3890	Bedroom	96.61%	YES	YES
Block B	Eleventh	3892	Kitchen Living Dining	98.79%	YES	YES
Block B	Eleventh	3895	Bedroom	96.50%	YES	YES
Block B	Eleventh	3897	Kitchen Living Dining	98.88%	YES	YES
Block B	Eleventh	4109	Bedroom	97.24%	YES	YES
Block B	Eleventh	4111	Bedroom	96.60%	YES	YES
Block B	Eleventh	4113	Kitchen Living Dining	99.13%	YES	YES
Block B	Eleventh	4117	Bedroom	97.19%	YES	YES
Block B	Eleventh	4119	Bedroom	96.58%	YES	YES
Block B	Eleventh	4121	Kitchen Living Dining	99.21%	YES	YES
Block B	Eleventh	4440	Bedroom	95.81%	YES	YES
Block B	Eleventh	4442	Kitchen Living Dining	98.01%	YES	YES
Block B	Eleventh	4513	Bedroom	89.87%	YES	YES
Block B	Eleventh	4514	Bedroom	97.32%	YES	YES
Block B	Eleventh	4515	Kitchen Living Dining	98.86%	YES	YES

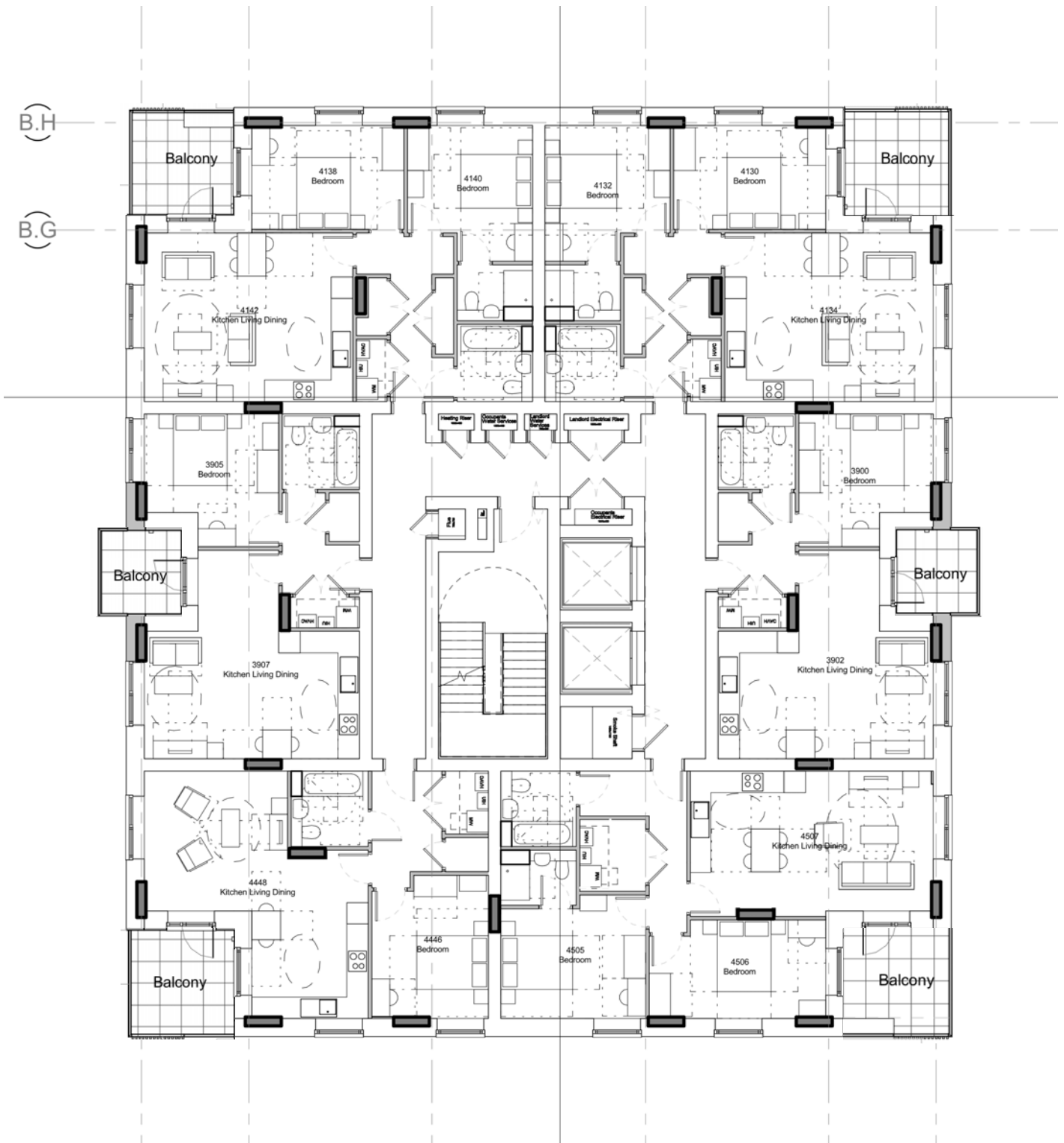


Figure 37. Block B - Twelfth Floor

Table 49. Daylight Assessment: Average Daylight Factor -Block B - 12F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Twelfth	3900	Bedroom	3.14	1	YES	1	YES
Block B	Twelfth	3902	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Twelfth	3905	Bedroom	3.14	1	YES	1	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block B	Twelfth	3907	Kitchen Living Dining	2.23	2	YES	1.5	YES
Block B	Twelfth	4130	Bedroom	2.86	1	YES	1	YES
Block B	Twelfth	4132	Bedroom	2.42	1	YES	1	YES
Block B	Twelfth	4134	Kitchen Living Dining	2.37	2	YES	1.5	YES
Block B	Twelfth	4138	Bedroom	2.86	1	YES	1	YES
Block B	Twelfth	4140	Bedroom	2.42	1	YES	1	YES
Block B	Twelfth	4142	Kitchen Living Dining	2.37	2	YES	1.5	YES
Block B	Twelfth	4446	Bedroom	2.29	1	YES	1	YES
Block B	Twelfth	4448	Kitchen Living Dining	3.49	2	YES	1.5	YES
Block B	Twelfth	4505	Bedroom	2.29	1	YES	1	YES
Block B	Twelfth	4506	Bedroom	2.67	1	YES	1	YES
Block B	Twelfth	4507	Kitchen Living Dining	2.34	2	YES	1.5	YES

Table 50. Daylight Assessment: No-Sky Line -Block B - 12F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block B	Twelfth	3900	Bedroom	96.61%	YES	YES
Block B	Twelfth	3902	Kitchen Living Dining	98.79%	YES	YES
Block B	Twelfth	3905	Bedroom	96.50%	YES	YES
Block B	Twelfth	3907	Kitchen Living Dining	98.88%	YES	YES
Block B	Twelfth	4130	Bedroom	97.24%	YES	YES
Block B	Twelfth	4132	Bedroom	96.60%	YES	YES
Block B	Twelfth	4134	Kitchen Living Dining	99.13%	YES	YES
Block B	Twelfth	4138	Bedroom	97.19%	YES	YES
Block B	Twelfth	4140	Bedroom	96.58%	YES	YES
Block B	Twelfth	4142	Kitchen Living Dining	99.21%	YES	YES
Block B	Twelfth	4446	Bedroom	95.81%	YES	YES
Block B	Twelfth	4448	Kitchen Living Dining	98.01%	YES	YES
Block B	Twelfth	4505	Bedroom	89.87%	YES	YES
Block B	Twelfth	4506	Bedroom	97.32%	YES	YES
Block B	Twelfth	4507	Kitchen Living Dining	98.86%	YES	YES

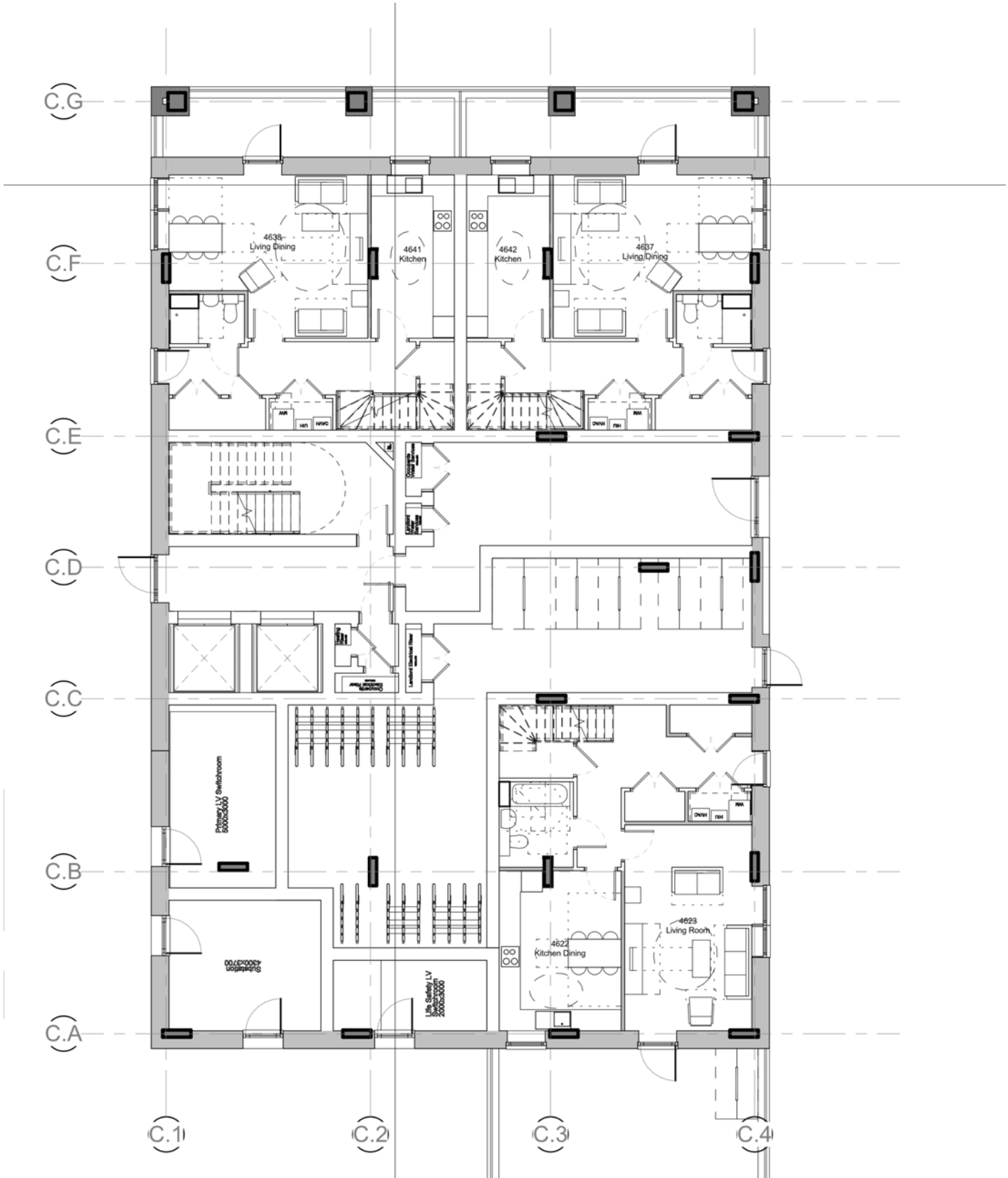


Figure 38. Block C - Ground Floor

Table 52. Daylight Assessment: Average Daylight Factor -Block C - GF

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Ground	4622	Kitchen Dining	1.30	2	NO	1.5	YES
Block C	Ground	4623	Living Room	3.38	1.5	YES	1.5	YES
Block C	Ground	4637	Living Dining	2.47	1.5	YES	1.5	YES
Block C	Ground	4638	Living Dining	1.65	1.5	YES	1.5	YES
Block C	Ground	4641	Kitchen	0.73	2	NO	2	NO
Block C	Ground	4642	Kitchen	0.59	2	NO	2	NO

Table 51. Daylight Assessment: No-Sky Line -Block C - GF

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Ground	4622	Kitchen Dining	49.20%	NO	YES
Block C	Ground	4623	Living Room	92.68%	YES	YES
Block C	Ground	4637	Living Dining	91.73%	YES	YES
Block C	Ground	4638	Living Dining	80.00%	YES	YES
Block C	Ground	4641	Kitchen	12.09%	NO	YES
Block C	Ground	4642	Kitchen	30.20%	NO	YES

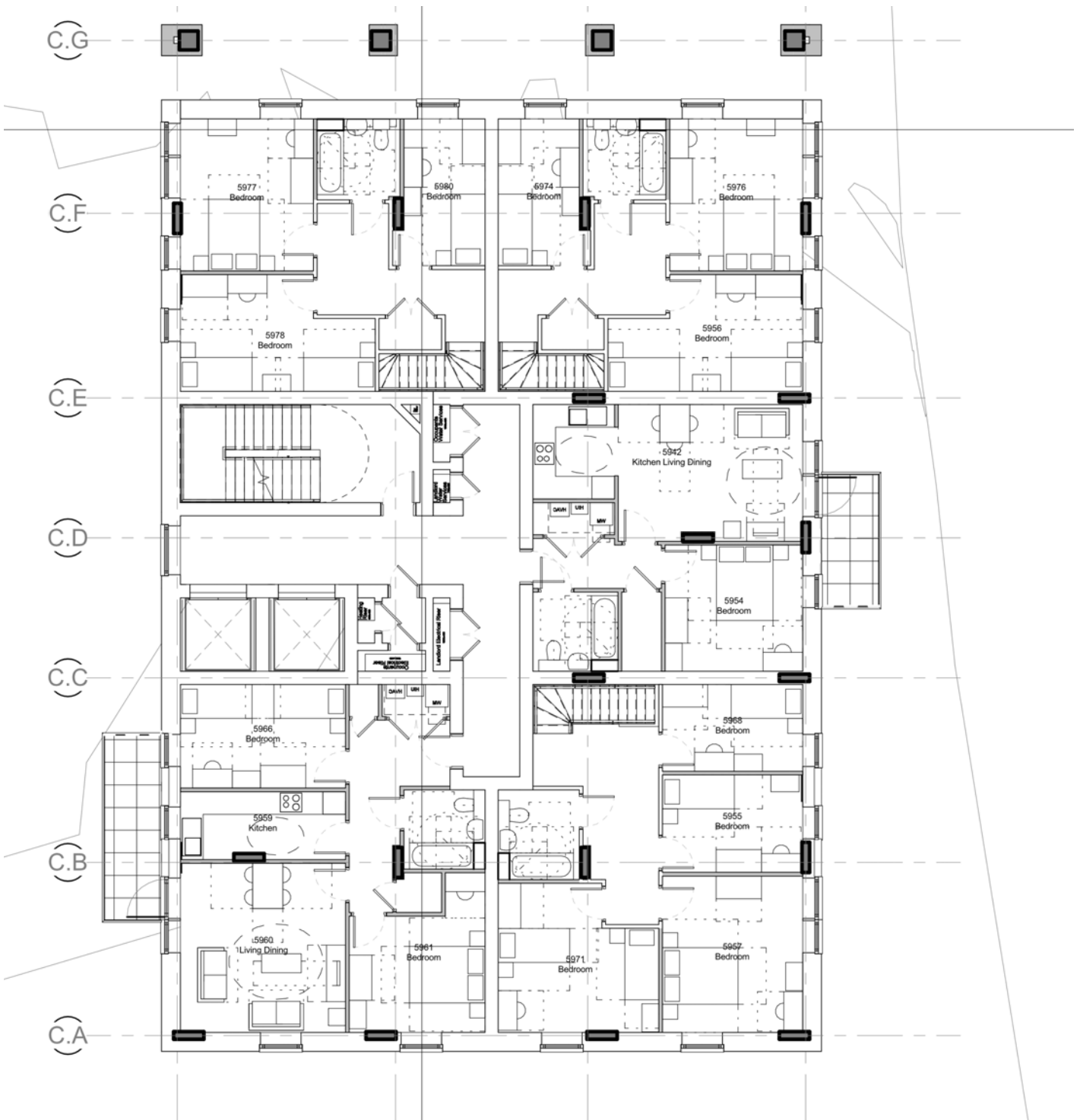


Figure 39. Block C - First Floor

Table 53. Daylight Assessment: Average Daylight Factor -Block C - 1F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	First	5942	Kitchen Living Dining	1.49	2	No	1.5	YES
Block C	First	5954	Bedroom	1.07	1	YES	1	YES
Block C	First	5955	Bedroom	1.10	1	YES	1	YES
Block C	First	5956	Bedroom	0.92	1	YES	1	YES
Block C	First	5957	Bedroom	3.81	1	YES	1	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	First	5959	Kitchen	0.83	2	NO	2	NO
Block C	First	5960	Living Dining	2.69	1.5	YES	1.5	YES
Block C	First	5961	Bedroom	1.56	1	YES	1	YES
Block C	First	5966	Bedroom	0.71	1	NO	1	NO
Block C	First	5968	Bedroom	1.38	1	YES	1	YES
Block C	First	5971	Bedroom	1.45	1	YES	1	YES
Block C	First	5974	Bedroom	0.27	1	NO	1	NO
Block C	First	5976	Bedroom	3.54	1	YES	1	YES
Block C	First	5977	Bedroom	2.16	1	YES	1	YES
Block C	First	5978	Bedroom	0.60	1	NO	1	NO
Block C	First	5980	Bedroom	0.35	1	NO	1	NO

Table 54. Daylight Assessment: No-Sky Line -Block C - 1F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	First	5942	Kitchen Living Dining	87.02%	YES	NO
Block C	First	5954	Bedroom	91.84%	YES	YES
Block C	First	5955	Bedroom	96.28%	YES	YES
Block C	First	5956	Bedroom	95.17%	YES	YES
Block C	First	5957	Bedroom	94.75%	YES	YES
Block C	First	5959	Kitchen	52.53%	NO	YES
Block C	First	5960	Living Dining	93.87%	YES	YES
Block C	First	5961	Bedroom	81.00%	YES	YES
Block C	First	5966	Bedroom	69.42%	NO	YES
Block C	First	5968	Bedroom	93.96%	YES	YES
Block C	First	5971	Bedroom	83.87%	YES	YES
Block C	First	5974	Bedroom	22.78%	NO	YES
Block C	First	5976	Bedroom	99.34%	YES	YES
Block C	First	5977	Bedroom	96.25%	YES	YES
Block C	First	5978	Bedroom	29.64%	NO	YES
Block C	First	5980	Bedroom	17.26%	NO	YES

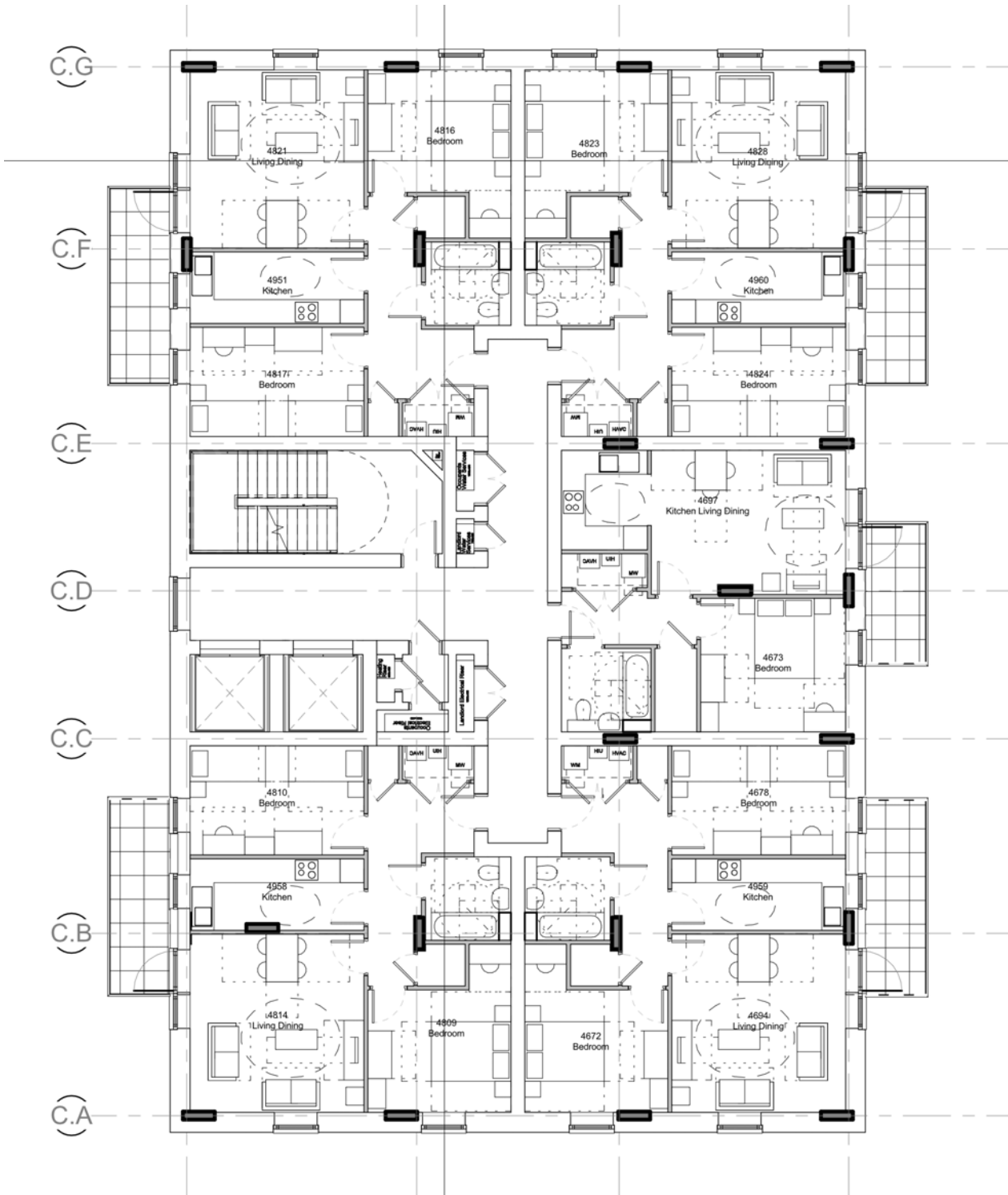


Figure 40. Block C - Second Floor

Table 55. Daylight Assessment: Average Daylight Factor - Block C - 2F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Second	4672	Bedroom	1.73	1	YES	1	YES
Block C	Second	4673	Bedroom	1.13	1	YES	1	YES
Block C	Second	4678	Bedroom	1.11	1	YES	1	YES
Block C	Second	4694	Living Dining	3.39	1.5	YES	1.5	YES
Block C	Second	4697	Kitchen Living Dining	1.57	2	NO	1.5	YES

Unit number	Floor	Room ID	Room Use	ADF value	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Second	4809	Bedroom	1.70	1	YES	1	YES
Block C	Second	4810	Bedroom	0.80	1	NO	1	NO
Block C	Second	4814	Living Dining	2.92	1.5	YES	1.5	YES
Block C	Second	4816	Bedroom	0.86	1	NO	1	NO
Block C	Second	4817	Bedroom	0.74	1	NO	1	NO
Block C	Second	4821	Living Dining	1.97	1.5	YES	1.5	YES
Block C	Second	4823	Bedroom	0.91	1	YES	1	YES
Block C	Second	4824	Bedroom	1.11	1	YES	1	YES
Block C	Second	4828	Living Dining	2.82	1.5	YES	1.5	YES
Block C	Second	4828	Living Dining	0.71	2	NO	2	NO
Block C	Second	4958	Kitchen	0.91	2	NO	2	NO
Block C	Second	4959	Kitchen	1.26	2	NO	2	NO
Block C	Second	4960	Kitchen	1.25	2	NO	2	NO

Table 56. Daylight Assessment: No-Sky Line -Block C - 2F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Second	4672	Bedroom	94.36%	YES	YES
Block C	Second	4673	Bedroom	91.91%	YES	YES
Block C	Second	4678	Bedroom	95.16%	YES	YES
Block C	Second	4694	Living Dining	96.00%	YES	YES
Block C	Second	4697	Kitchen Living Dining	89.23%	YES	NO
Block C	Second	4809	Bedroom	92.85%	YES	YES
Block C	Second	4810	Bedroom	81.83%	YES	YES
Block C	Second	4814	Living Dining	94.07%	YES	YES
Block C	Second	4816	Bedroom	39.98%	NO	YES
Block C	Second	4817	Bedroom	38.13%	NO	YES
Block C	Second	4821	Living Dining	80.00%	YES	YES
Block C	Second	4823	Bedroom	36.37%	NO	YES
Block C	Second	4824	Bedroom	95.17%	YES	YES
Block C	Second	4828	Living Dining	95.82%	YES	YES
Block C	Second	4828	Living Dining	29.71%	NO	YES
Block C	Second	4958	Kitchen	67.13%	NO	YES
Block C	Second	4959	Kitchen	84.30%	YES	YES
Block C	Second	4960	Kitchen	80.00%	YES	YES

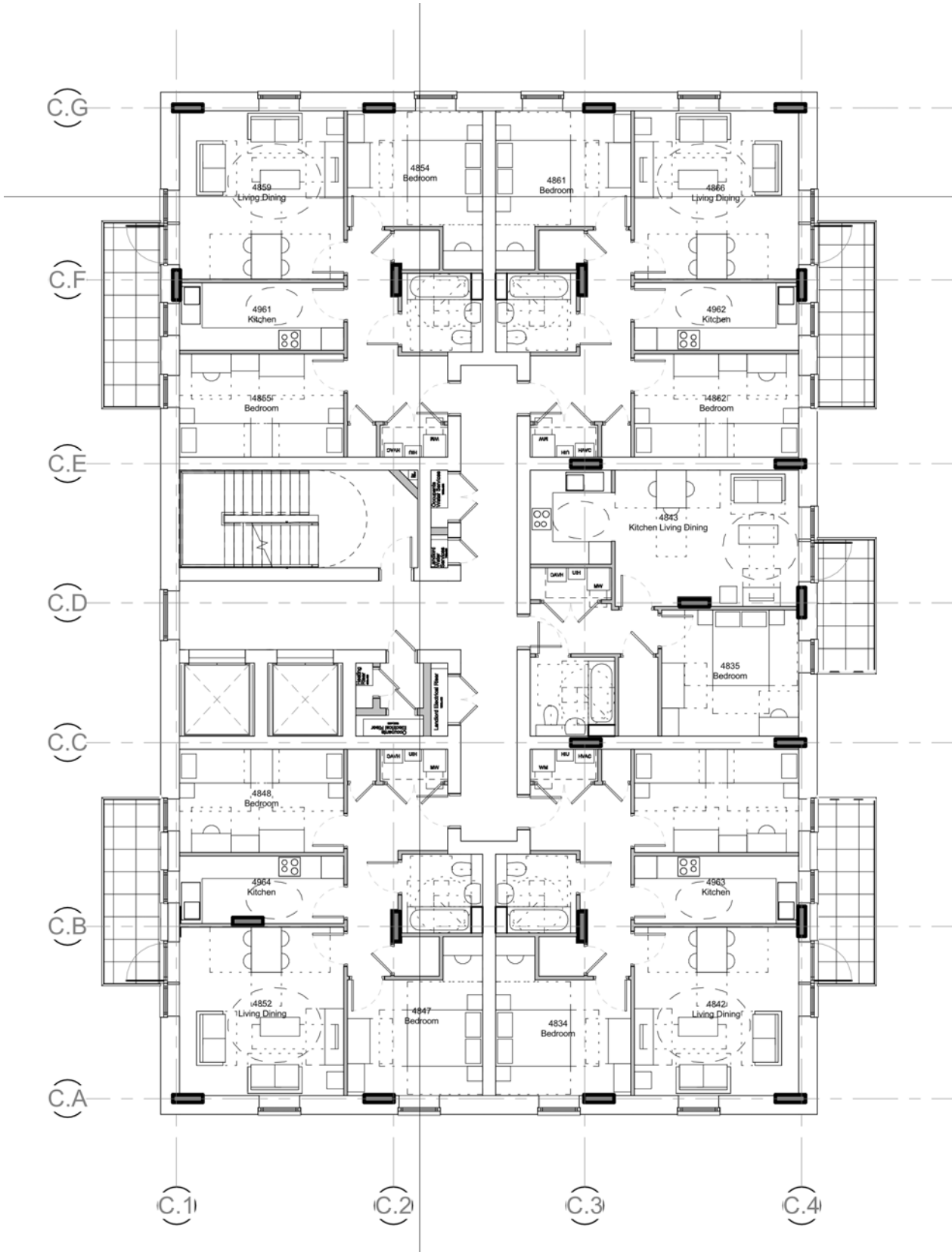


Figure 41. Block C - Third Floor

Table 58. Daylight Assessment: Average Daylight Factor -Block C - 3F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Third	4834	Bedroom	1.84	1	YES	1	YES
Block C	Third	4835	Bedroom	1.15	1	YES	1	YES
Block C	Third	4842	Living Dining	4.09	1.5	YES	1.5	YES
Block C	Third	4843	Kitchen Living Dining	1.60	2	NO	1.5	YES
Block C	Third	4847	Bedroom	1.82	1	YES	1	YES
Block C	Third	4848	Bedroom	1.25	1	YES	1	YES
Block C	Third	4852	Living Dining	3.67	1.5	YES	1.5	YES
Block C	Third	4854	Bedroom	0.87	1	NO	1	NO
Block C	Third	4855	Bedroom	0.79	1	NO	1	NO
Block C	Third	4859	Living Dining	2.09	1.5	YES	1.5	YES
Block C	Third	4861	Bedroom	0.92	1	YES	1	YES
Block C	Third	4862	Bedroom	1.13	1	YES	1	YES
Block C	Third	4866	Living Dining	2.87	1.5	YES	1.5	YES
Block C	Third	4961	Kitchen	0.79	2	NO	2	NO
Block C	Third	4962	Kitchen	1.28	2	NO	2	NO
Block C	Third	4963	Kitchen	1.94	2	YES	2	YES
Block C	Third	4964	Kitchen	1.60	2	NO	2	NO
Block C	Third	5	Bedroom	1.73	1	YES	1	YES

Table 57. Daylight Assessment: No-Sky Line -Block C - 3F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Third	4834	Bedroom	94.39%	YES	YES
Block C	Third	4835	Bedroom	91.82%	YES	YES
Block C	Third	4842	Living Dining	96.05%	YES	YES
Block C	Third	4843	Kitchen Living Dining	89.99%	YES	NO
Block C	Third	4847	Bedroom	94.48%	YES	YES
Block C	Third	4848	Bedroom	94.38%	YES	YES
Block C	Third	4852	Living Dining	94.00%	YES	YES
Block C	Third	4854	Bedroom	39.99%	NO	YES
Block C	Third	4855	Bedroom	45.09%	NO	YES
Block C	Third	4859	Living Dining	80.33%	YES	YES
Block C	Third	4861	Bedroom	36.39%	NO	YES

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Third	4862	Bedroom	95.17%	YES	YES
Block C	Third	4866	Living Dining	95.83%	YES	YES
Block C	Third	4961	Kitchen	34.10%	NO	YES
Block C	Third	4962	Kitchen	84.72%	YES	YES
Block C	Third	4963	Kitchen	85.36%	YES	YES
Block C	Third	4964	Kitchen	82.28%	YES	YES
Block C	Third	5	Bedroom	95.25%	YES	YES

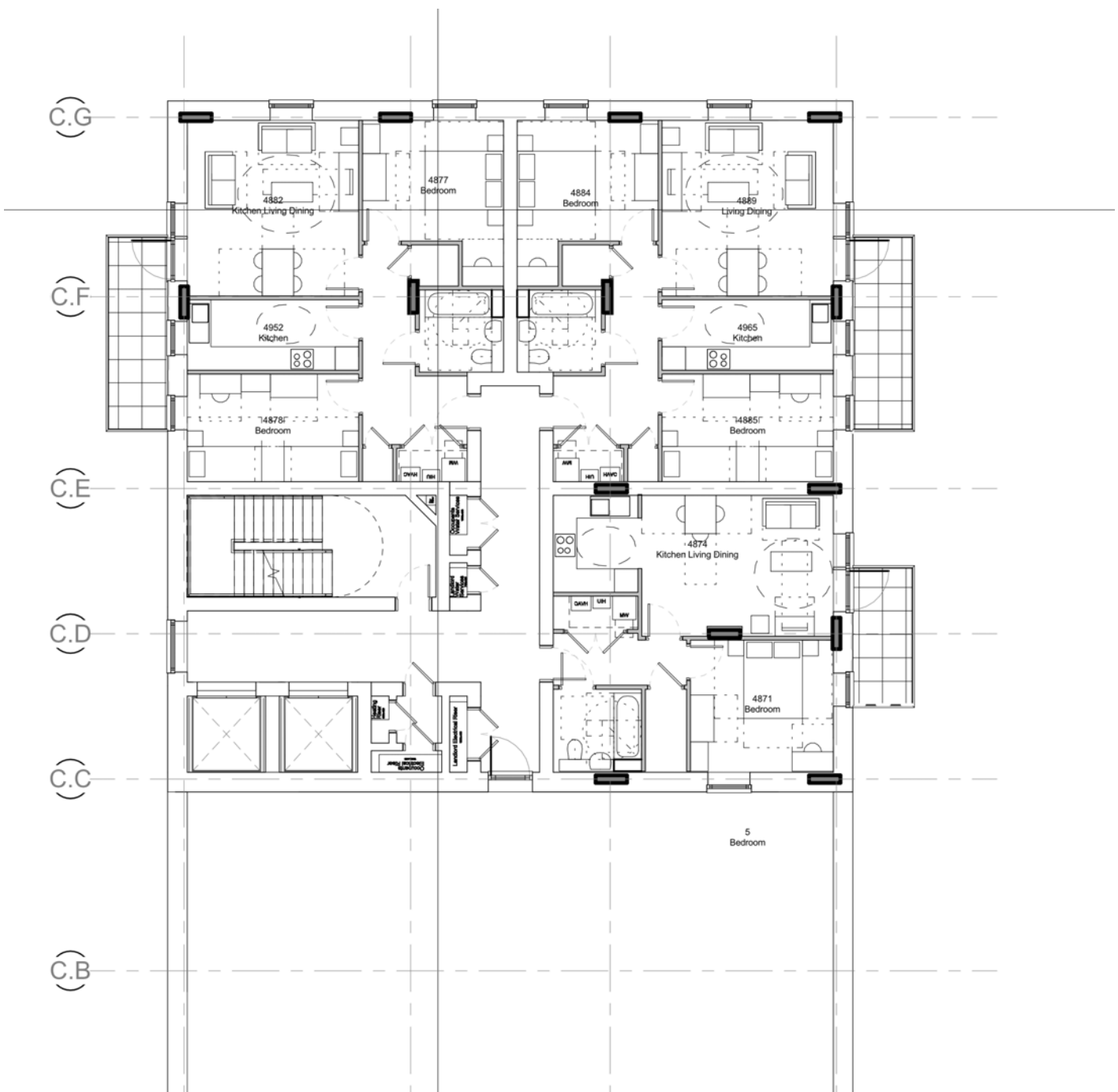


Figure 42. Block C - Fourth Floor

Table 60. Daylight Assessment: Average Daylight Factor -Block C - 4F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Fourth	4871	Bedroom	2.85	1	YES	1	YES
Block C	Fourth	4874	Kitchen Living Dining	1.61	2	NO	1.5	YES
Block C	Fourth	4877	Bedroom	0.89	1	YES	1	YES
Block C	Fourth	4878	Bedroom	0.84	1	YES	1	YES
Block C	Fourth	4882	Kitchen Living Dining	2.21	2	YES	1.5	YES
Block C	Fourth	4884	Bedroom	0.93	1	YES	1	YES
Block C	Fourth	4885	Bedroom	1.13	1	YES	1	YES
Block C	Fourth	4889	Living Dining	2.88	1.5	YES	1.5	YES
Block C	Fourth	4952	Kitchen	0.85	2	NO	2	NO
Block C	Fourth	4965	Kitchen	1.28	2	NO	2	NO

Table 59. Daylight Assessment: No-Sky Line -Block C - 4F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth
Block C	Fourth	4871	Bedroom	91.61%	YES	YES
Block C	Fourth	4874	Kitchen Living Dining	90.16%	YES	NO
Block C	Fourth	4877	Bedroom	40.53%	NO	YES
Block C	Fourth	4878	Bedroom	45.95%	NO	YES
Block C	Fourth	4882	Kitchen Living Dining	80.42%	YES	YES
Block C	Fourth	4884	Bedroom	36.43%	NO	YES
Block C	Fourth	4885	Bedroom	95.17%	YES	YES
Block C	Fourth	4889	Living Dining	95.82%	YES	YES
Block C	Fourth	4952	Kitchen	36.63%	NO	YES
Block C	Fourth	4965	Kitchen	85.41%	YES	YES

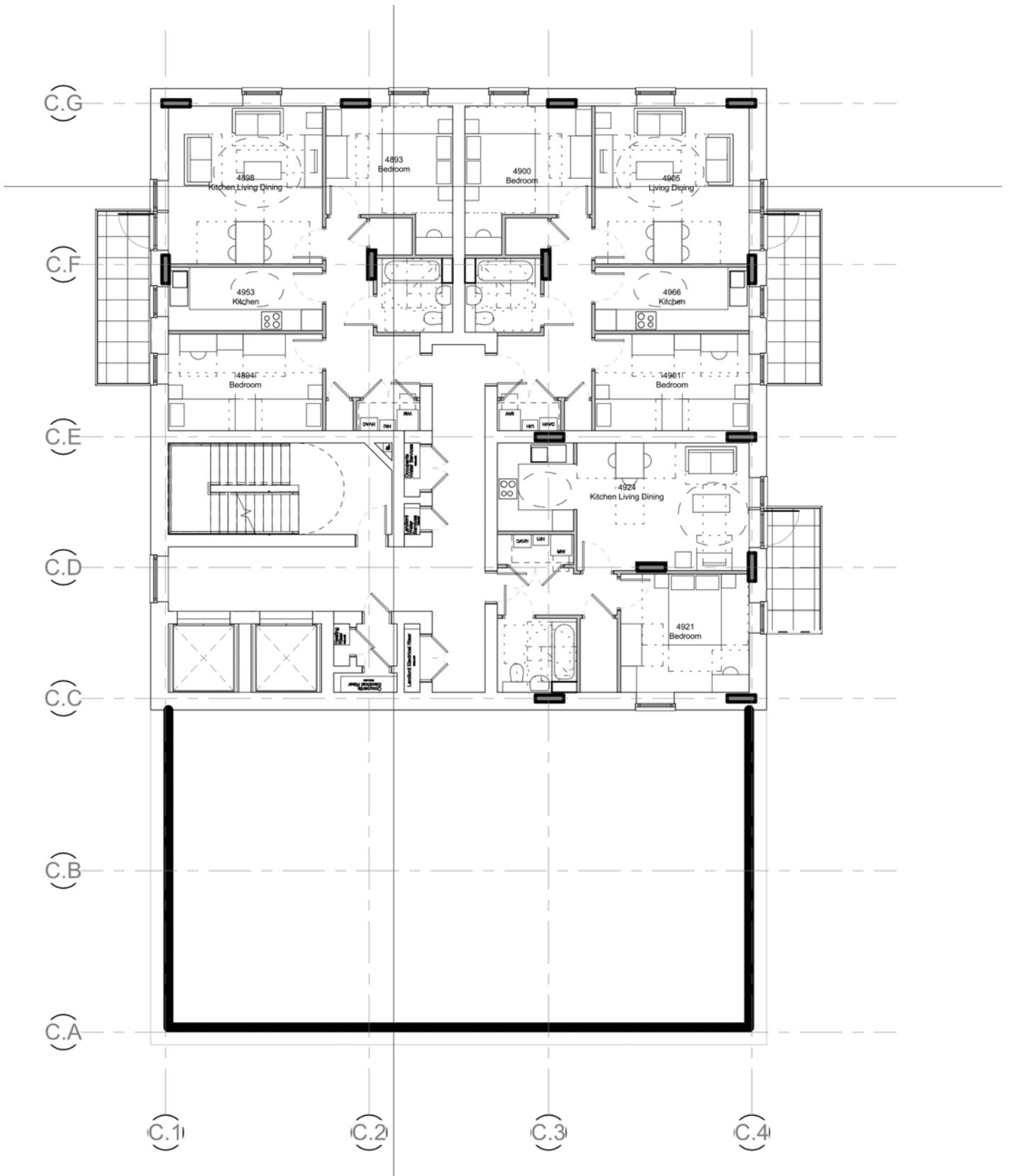


Figure 43. Block C - Fifth Floor

Table 62. Daylight Assessment: Average Daylight Factor -Block C - 5F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Fifth	4893	Bedroom	0.90	1	YES	1	YES
Block C	Fifth	4894	Bedroom	0.91	1	YES	1	YES
Block C	Fifth	4898	Kitchen Living Dining	2.35	2	YES	1.5	YES
Block C	Fifth	4900	Bedroom	0.95	1	YES	1	YES
Block C	Fifth	4901	Bedroom	1.13	1	YES	1	YES
Block C	Fifth	4905	Living Dining	2.89	1.5	YES	1.5	YES
Block C	Fifth	4921	Bedroom	3.18	1	YES	1	YES
Block C	Fifth	4924	Kitchen Living Dining	1.60	2	NO	1.5	YES
Block C	Fifth	4953	Kitchen	0.96	2	NO	2	NO
Block C	Fifth	4966	Kitchen	1.28	2	NO	2	NO

Table 61. Daylight Assessment: No-Sky Line -Block C - 5F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Fifth	4893	Bedroom	40.54%	NO	YES
Block C	Fifth	4894	Bedroom	53.04%	NO	YES
Block C	Fifth	4898	Kitchen Living Dining	81.00%	YES	YES
Block C	Fifth	4900	Bedroom	36.43%	NO	YES
Block C	Fifth	4901	Bedroom	95.17%	YES	YES
Block C	Fifth	4905	Living Dining	95.82%	YES	YES
Block C	Fifth	4921	Bedroom	94.34%	YES	YES
Block C	Fifth	4924	Kitchen Living Dining	89.99%	YES	NO
Block C	Fifth	4953	Kitchen	43.51%	NO	YES
Block C	Fifth	4966	Kitchen	85.41%	YES	YES

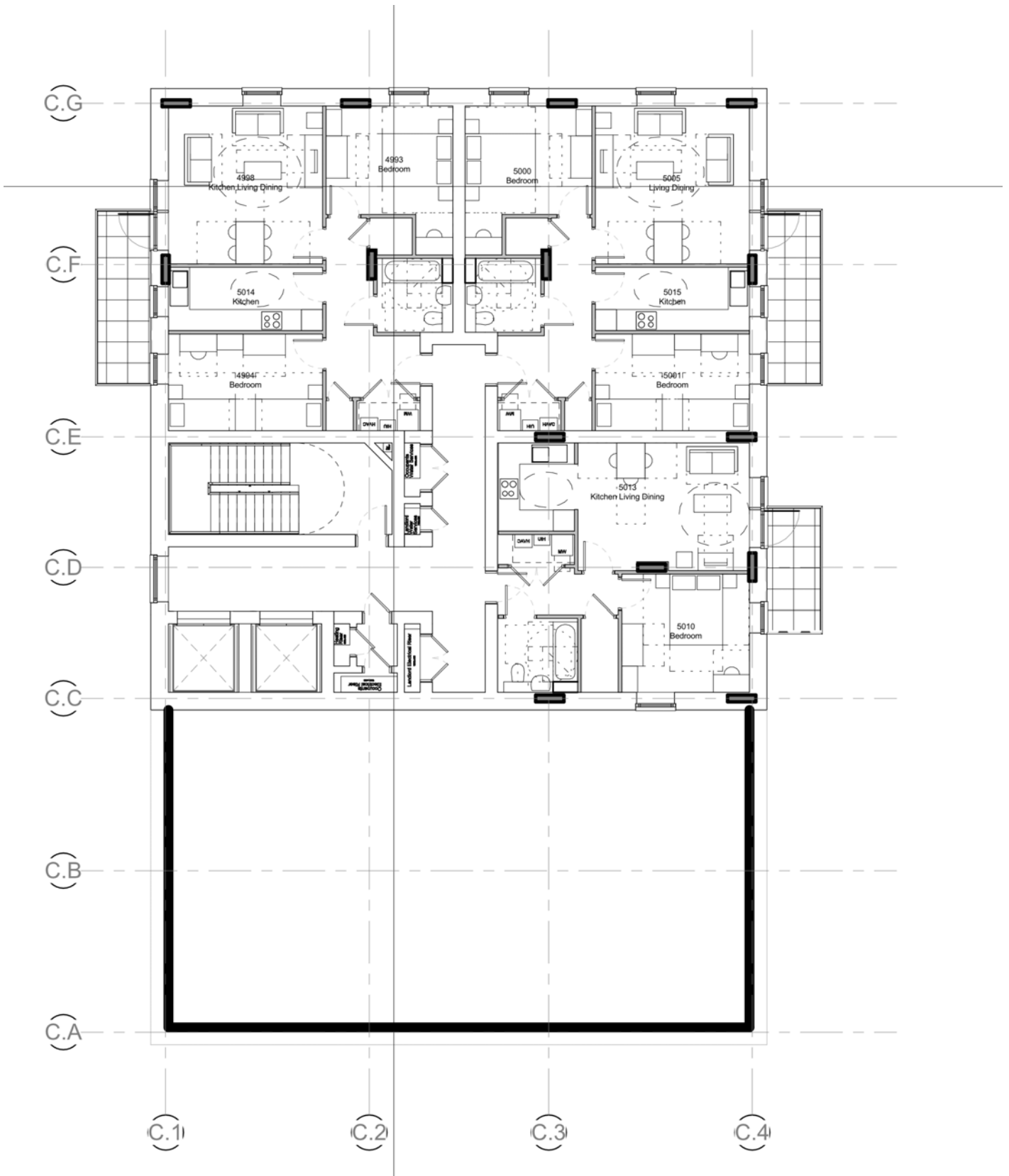


Figure 44. Block C - Sixth Floor

Table 64. Daylight Assessment: Average Daylight Factor -Block C - 6F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Sixth	4993	Bedroom	0.92	1	YES	1	YES
Block C	Sixth	4994	Bedroom	0.98	1	YES	1	YES
Block C	Sixth	4998	Kitchen Living Dining	2.50	2	YES	1.5	YES
Block C	Sixth	5000	Bedroom	0.97	1	YES	1	YES
Block C	Sixth	5001	Bedroom	1.13	1	YES	1	YES
Block C	Sixth	5005	Living Dining	2.90	1.5	YES	1.5	YES
Block C	Sixth	5010	Bedroom	3.19	1	YES	1	YES
Block C	Sixth	5013	Kitchen Living Dining	1.61	2	NO	1.5	YES
Block C	Sixth	5014	Kitchen	1.07	2	NO	2	NO
Block C	Sixth	5015	Kitchen	1.28	2	NO	2	NO

Table 63. Daylight Assessment: No-Sky Line -Block C - 6F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Sixth	4993	Bedroom	40.70%	NO	YES
Block C	Sixth	4994	Bedroom	80.00%	YES	YES
Block C	Sixth	4998	Kitchen Living Dining	87.54%	YES	YES
Block C	Sixth	5000	Bedroom	36.43%	NO	YES
Block C	Sixth	5001	Bedroom	95.17%	YES	YES
Block C	Sixth	5005	Living Dining	95.82%	YES	YES
Block C	Sixth	5010	Bedroom	94.30%	YES	YES
Block C	Sixth	5013	Kitchen Living Dining	89.85%	YES	NO
Block C	Sixth	5014	Kitchen	57.90%	NO	YES
Block C	Sixth	5015	Kitchen	85.41%	YES	YES

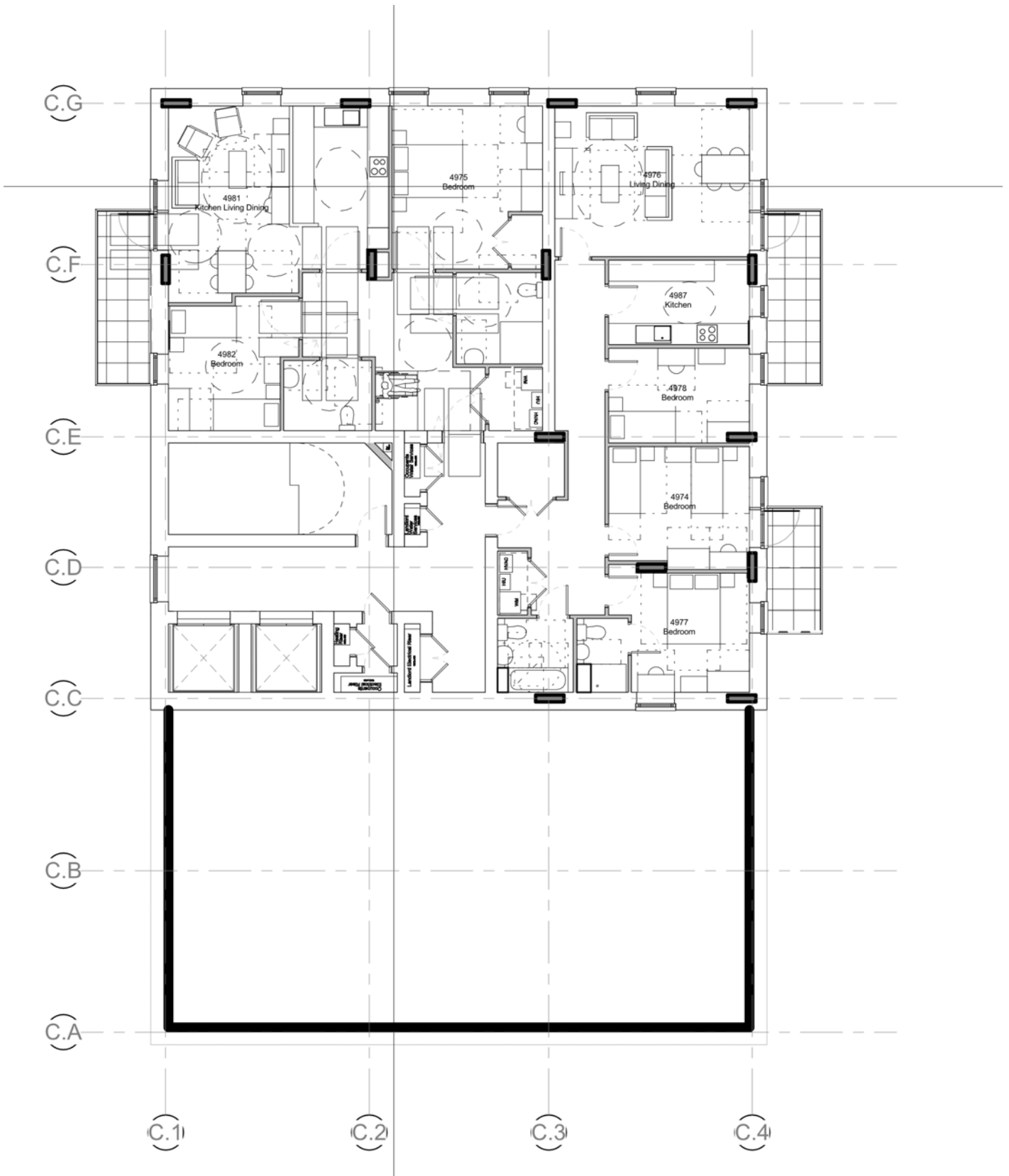


Figure 45. Block C - Seventh Floor

Table 66. Daylight Assessment: Average Daylight Factor -Block C - 7F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Seventh	4974	Bedroom	3.46	1	YES	1	YES
Block C	Seventh	4975	Bedroom	1.54	1	YES	1	YES
Block C	Seventh	4976	Living Dining	3.06	1.5	YES	1.5	YES
Block C	Seventh	4977	Bedroom	3.36	1	YES	1	YES
Block C	Seventh	4978	Bedroom	1.64	1	YES	1	YES
Block C	Seventh	4981	Kitchen Living Dining	3.16	2	YES	1.5	YES
Block C	Seventh	4982	Bedroom	1.35	1	YES	1	YES
Block C	Seventh	4987	Kitchen	1.78	2	NO	2	NO

Table 65. Daylight Assessment: No-Sky Line -Block C - 7F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Seventh	4974	Bedroom	98.01%	YES	YES
Block C	Seventh	4975	Bedroom	80.00%	YES	YES
Block C	Seventh	4976	Living Dining	96.58%	YES	YES
Block C	Seventh	4977	Bedroom	94.44%	YES	YES
Block C	Seventh	4978	Bedroom	93.92%	YES	YES
Block C	Seventh	4981	Kitchen Living Dining	93.54%	YES	YES
Block C	Seventh	4982	Bedroom	92.18%	YES	YES
Block C	Seventh	4987	Kitchen	97.14%	YES	YES

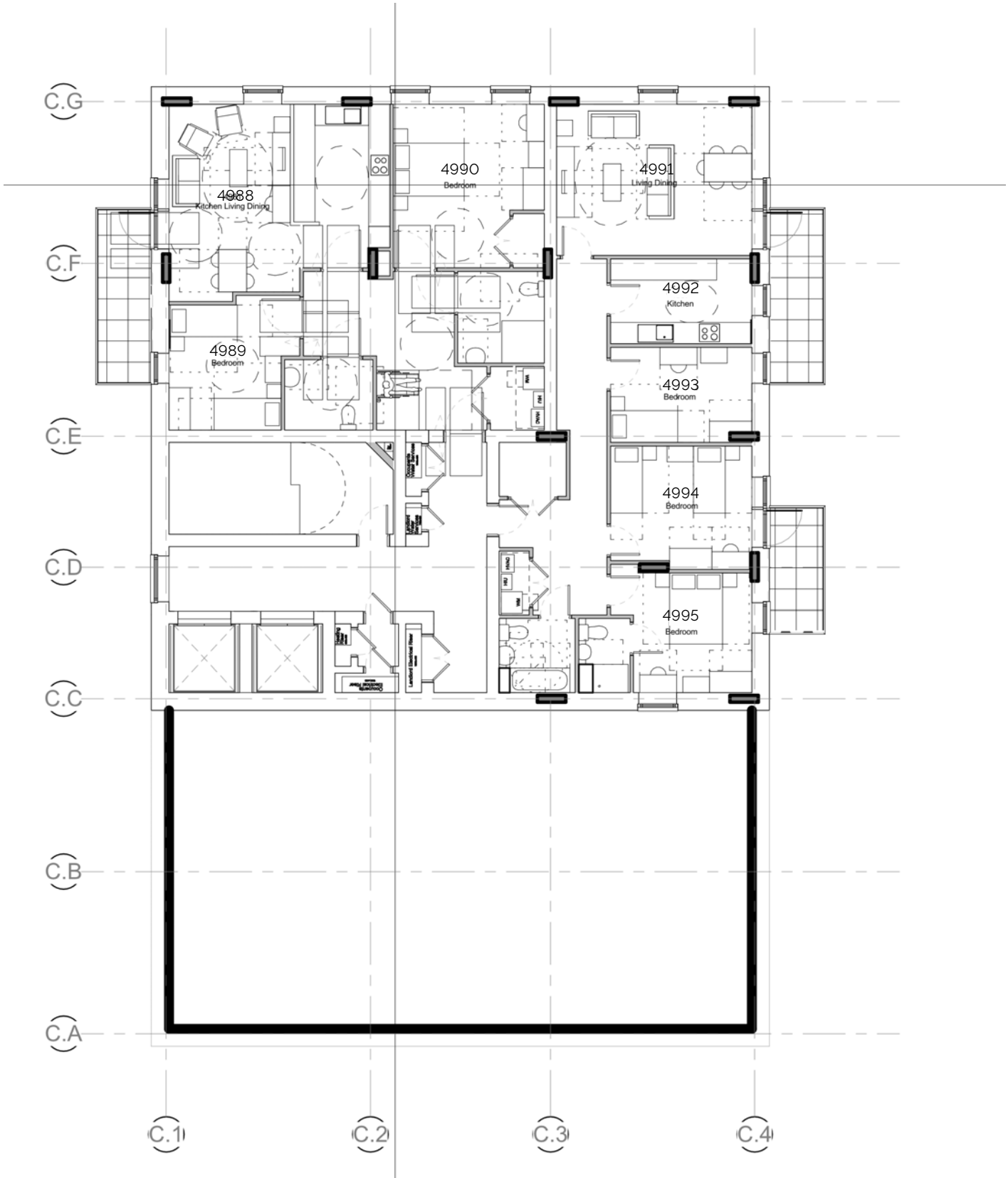


Figure 46. Block C - Eighth Floor

Table 68. Daylight Assessment: Average Daylight Factor -Block C - 8F

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block C	Eighth	4994	Bedroom	3.48	1	YES	1	YES
Block C	Eighth	4990	Bedroom	1.56	1	YES	1	YES
Block C	Eighth	4991	Living Dining	3.08	1.5	YES	1.5	YES
Block C	Eighth	4995	Bedroom	3.38	1	YES	1	YES
Block C	Eighth	4993	Bedroom	1.66	1	YES	1	YES
Block C	Eighth	4988	Kitchen Living Dining	3.18	2	YES	1.5	YES
Block C	Eighth	4989	Bedroom	1.37	1	YES	1	YES
Block C	Eighth	4992	Kitchen	1.80	2	NO	2	NO

Table 67. Daylight Assessment: No-Sky Line -Block C - 8F

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block C	Eighth	4994	Bedroom	98.01%	YES	YES
Block C	Eighth	4990	Bedroom	80.00%	YES	YES
Block C	Eighth	4991	Living Dining	96.58%	YES	YES
Block C	Eighth	4995	Bedroom	94.44%	YES	YES
Block C	Eighth	4993	Bedroom	93.92%	YES	YES
Block C	Eighth	4988	Kitchen Living Dining	93.54%	YES	YES
Block C	Eighth	4989	Bedroom	92.18%	YES	YES
Block C	Eighth	4992	Kitchen	97.14%	YES	YES

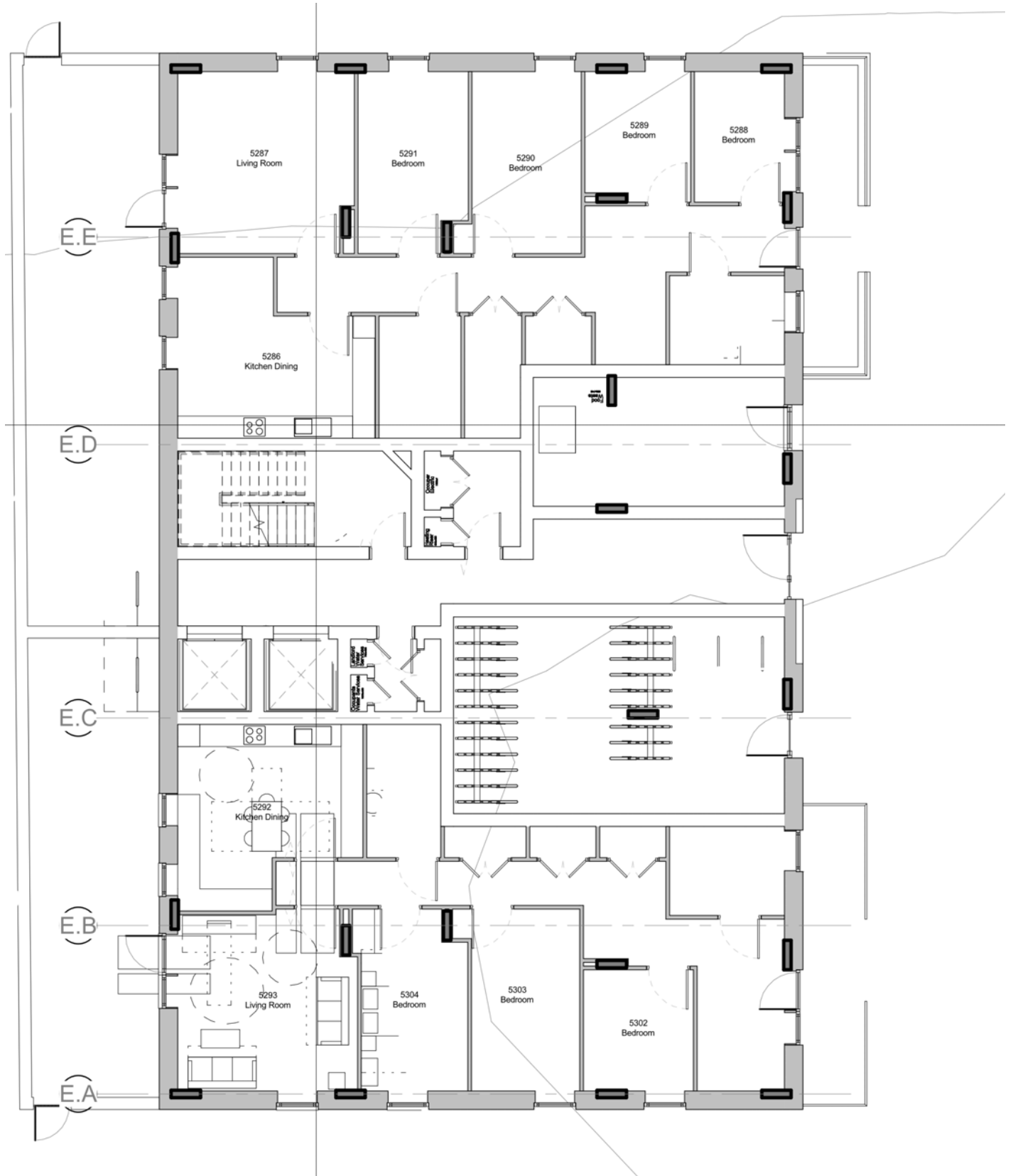


Figure 47. Block D - Ground Floor

Table 70. Daylight Assessment: Average Daylight Factor -Block D - GF

Block number	Floor	Room ID	Room Use	ADF value (%)	Target value (%)	Meets BRE criteria	Target value (%)	Meets criteria
Block D	Ground	5286	Kitchen Dining	1.50	2	NO	1.5	YES
Block D	Ground	5287	Living Room	2.50	1.5	YES	1.5	YES
Block D	Ground	5288	Bedroom	1.50	1	YES	1	YES
Block D	Ground	5289	Bedroom	1.72	1	YES	1	YES
Block D	Ground	5290	Bedroom	1.00	1	YES	1	YES
Block D	Ground	5291	Bedroom	1.00	1	YES	1	YES
Block D	Ground	5292	Kitchen Dining	1.50	2	NO	1.5	YES
Block D	Ground	5293	Living Room	2.40	1.5	YES	1.5	YES
Block D	Ground	5302	Bedroom	1.90	1	YES	1	YES
Block D	Ground	5303	Bedroom	1.00	1	YES	1	YES
Block D	Ground	5304	Bedroom	1.06	1	YES	1	YES

Table 69. Daylight Assessment: No-Sky Line -Block D - GF

Unit number	Floor	Room ID	Room Use	NSL value	Meets BRE criteria	Meets Room Depth criterion
Block D	Ground	5286	Kitchen Dining	73.91%	NO	YES
Block D	Ground	5287	Living Room	93.12%	YES	YES
Block D	Ground	5288	Bedroom	75.65%	NO	YES
Block D	Ground	5289	Bedroom	69.72%	NO	YES
Block D	Ground	5290	Bedroom	76.72%	NO	YES
Block D	Ground	5291	Bedroom	95.42%	YES	YES
Block D	Ground	5292	Kitchen Dining	73.89%	NO	YES
Block D	Ground	5293	Living Room	94.46%	YES	YES
Block D	Ground	5302	Bedroom	70.02%	NO	YES
Block D	Ground	5303	Bedroom	49.34%	NO	YES
Block D	Ground	5304	Bedroom	84.13%	YES	YES