Westmoreland Road car park, Bromley
in the London Borough of Bromley
planning application no.11/ 03865/ FULL1

Strategic planning application stage 1 referral (new powers)

The proposal
Demolition of existing buildings and redevelopment with mixed use scheme comprising multi-use cinema, 200 flats, 130 bedroom hotel, class A3 units (cafe and restaurant) (including one unit for flexible A1 retail use) or class A4 (drinking establishment), basement car parking, access arrangements (including bus parking), public realm and ancillary development.

The applicant
The applicant is Cathedral (Bromley) Ltd and the architect is Guy Holloway Architects.

Strategic issues
The proposal for a mixed use development on this town centre site does not raise strategic planning issues in terms of the principle of development. The results of the independent assessment of the viability appraisal are required before it can be determined whether the proposal delivers the ‘maximum reasonable amount’ of affordable housing. The tenure split and unit mix require further justification.

The design of the proposal is of high quality given the constraints of the site.

Further information is required in relation to the access and inclusion, transport and climate change mitigation.

Recommendation
That Bromley Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 102 of this report; but that the possible remedies set out in paragraph 103 of this report could address these deficiencies.

Context
1 On the 5 January 2012, the Mayor of London received documents from Bromley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 15 February 2012 to provide the Council with a statement setting
out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B, 1C and 3F of the Schedule to the Order 2008:

- **Category 1A**: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

- **Category 1B**: Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings—(b) in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres;

- **Category 1C**: Development which comprises or includes the erection of a building of one or more of the following descriptions—(c) the building is more than 30 metres high and is outside the City of London.

- **Category 3F**: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.

3 Once Bromley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

**Site description**

5 The application site is 1.01 hectares and is land locked on three sides. It is located in Bromley town centre adjacent to the main commuter railway line to the north, the Royal Bank of Scotland complex to the east, two storey residential properties of Newbury Road to the west and Westmoreland Road to the immediate south. The locally listed St Mark’s Church stands on the opposite side of the Westmoreland Road. The site is currently occupied by a five storey public car park which provides 581 spaces for town centre activities and rail commuters. The site also contains five small single storey retail/restaurant units along the Westmoreland Road site frontage, where it meets the junction with Simpsons Road. A further small property, presently used as a place of worship (Class D1) is also located within the site, although the temporary permission for such use has now lapsed.

6 The application site drops approximately 5 metres in height from the link to the High Street on the north eastern part of the site, to the Westmoreland Road street frontage at the southern end. Pedestrian access is provided from Westmoreland Road and via an elevated pedestrian walkway linking the multi-storey car park with the Royal Bank of Scotland (RBS) Complex and Bromley High Street beyond.

7 The application site is located close to main transport links, including Bromley South Mainline Rail Station and has a public transport accessibility level (PTAL) range of 4 to 6 (where 6 is excellent). A bus lay-over is also contained within the application site, although this is not used for passenger alighting. Simpson’s Road provides direct vehicular access and egress to the multi-storey car park and to the adjacent Royal Bank of Scotland basement car park and service
yard. It also forms a rear service access to a small number of retail properties located at the southern end of Bromley High Street.

Details of the proposal

To clarify in more detail, this mixed-use development scheme will consist of the following core elements (all floorspaces are gross internal area unless otherwise specified):

- **Multi-Screen Cinema (Class D2 Assembly & Leisure):** A nine screen cinema is proposed at the level below the podium deck, which will total 2,708 sq.m when including foyer, circulation and ancillary space. The cinema will be accessed on foot via escalators at podium level, with the entrance located in the north western corner of the public plaza.

- **200 residential units (Class C3):** 60 x one bedroom apartments (a minimum of 50 sq.m), 124 x two bedroom apartments (minimum of 65 sq.m), 2 x two bedroom penthouse apartments, 4 x three bedroom apartments (approximately 86 sq.m), 10 x two bedroom maisonettes (approximtely 77 sq.m).

- **Restaurant/cafe (Class A3) 2,629 sq.m total floorspace:** These new units will face out onto the main public plaza at either podium level or the lower level adjacent to Westmoreland Road:

  - Units 1-7 (Class A3 restaurants) - 1,755 sq.m
  - Unit 8 (Flexible Class A1/A3/A4) - 544 sq.m
  - Unit 9 (Class A3 – under hotel) - 330 sq.m

- **130 bedroom hotel (Class C1):** This 4,800 sq.m hotel will include lower ground floor foyer, circulation space and plaza level restaurant space connected to the hotel. The total gross internal floorspace for the cinema, residential, hotel and restaurant uses (including Unit No.8) will be 25,315 sq.m.

- **Subterranean car park and other ancillary development:** A lower ground and subterranean car park (five decks) will be constructed, providing 400 car parking spaces (including 33 disabled spaces) and 20 motorcycle spaces. The proposal will also include the provision of 301 secure bicycle parking spaces throughout the site, including at plaza level. Provision will be made for 20 electric car charging points (20 spaces) within the site which will be split, pro rata between the public and residential parking areas.

Case history

On the 16 September 2011 a pre-application meeting was held at City Hall which established that the proposal for a mixed use development on this site raised no strategic planning issues in terms of the principle of development. However, some concerns were raised relating to the accessibility of the proposed public piazza and the lack family accommodation on the site. It was noted that other matters relating to access and inclusion, heritage, views, housing and transport set out above should be addressed.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:
• Economic development  London Plan; the Mayor’s Economic Development Strategy; Employment Action Plan
• Mix of uses  London Plan
• Housing  London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG, Housing Strategy; draft Revised Housing Strategy; Interim Housing SPG; draft Housing SPG
• Affordable housing  London Plan; PPS3; Housing SPG, Housing Strategy; draft Revised Housing Strategy; Interim Housing SPG; draft Housing SPG; Affordable Rent draft SPG; draft Early Minor Alteration to the London Plan
• Density  London Plan; PPS3; Housing SPG; Interim Housing SPG; draft Housing SPG
• Urban design  London Plan; PPS1
• Access  London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
• Transport  London Plan; the Mayor’s Transport Strategy; PPG13
• Crossrail  London Plan; draft Mayoral Community Infrastructure Levy; Crossrail SPG
• Parking  London Plan; Assembly draft Early Minor Alteration to the London Plan; the Mayor’s Transport Strategy; PPG13
• Tall buildings/ views  London Plan; RPG3A, Revised View Management Framework SPG; revised draft View Management Framework
• Sustainable development  London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; Mayor’s Climate Change Mitigation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy; Sustainable Design and Construction SPG

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Bromley (insert year of adoption) Bromley Council (insert name of borough) Unitary Development Plan (2006), the Bromley Town Centre Area Action Plan (October 2010) and the 2011 London Plan.

12 The Early Minor Alteration to the London Plan is also a relevant material consideration.

Principle of development

13 The proposed development site is identified in the Bromley Town Centre AAP as ‘Opportunity site K’ on which development including the following components is encouraged:

• 1000 sq.m. leisure floorspace
• a 100 bedroom hotel
• residential development of up to 200 units
• 500 car parking spaces (400 commercial and 100 residential).

14 It is noted in the document that this site is key to improving the quality of Bromley South as a destination and sets out that it should come forward for development as part of ‘Phase one’ of the Bromley Town Centre regeneration. This detailed site designation establishes the acceptability of the proposed residential, commercial and leisure uses and raises no strategic planning concerns in relation to the principle of development.
15 The application site is located within Bromley town centre. The London Plan sets out that Bromley is also the only designated ‘metropolitan centre’ in the London Borough of Bromley. London Plan policy 2.15 ‘town centres’ sets out a range of objectives that development proposals in town centres should seek to achieve, including: sustain and enhance the vitality and viability of the centre, accommodate economic and/or housing growth, support and enhance competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services; be in scale with the centre, promote access by public transport, walking and cycling. This proposal will contribute towards achieving these objectives for Bromley town centre.

16 The site also falls within Outer London, as identified in the London Plan. London Plan Policy 2.7 ‘Outer London: economy’ states that boroughs should be “f) identifying and bringing capacity in and around town centres with good public transport accessibility to accommodate leisure, retail and civic needs and higher density housing” and “k) supporting leisure, arts, culture and tourism and the contribution that theatres and similar facilities... can make to the outer London economy, including through proactive identification of cultural quarters and promotion of the night time economy”. This proposed development is anticipated to respond well to its local and strategic context.

**Mix of uses**

17 The proposed development offers a mix of uses and a detailed landscaping plan which will provide an area of public open space within the scheme. In addition to the proposed residential uses, the scheme provides for a range of commercial uses including a hotel, a cinema and commercial uses to include several restaurants and a brasserie use. These uses are specified in the Bromley Town Centre AAP and the proposal offers a genuine mixed-use development.

18 The proposed cinema/leisure use is supported by London Plan policy 4.6 ‘Support for and enhancement of arts, culture, sport and entertainment provision’, which seeks to “d) promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal” and “g) provide arts and cultural facilities in major mixed use redevelopment”. The proposed hotel use is supported by London Plan policy 4.5 ‘London’s visitor infrastructure’ which identifies the need for improved quality, variety and distribution of visitor accommodation in London, including apart-hotels, which sets out that to accommodate potential growth, it is estimated that a further 40,000 net hotel bedrooms should be provided in a period up to 2031 in a range of suitable locations throughout London. The applicant also confirmed in the meeting that the adjacent building, the RBS office, has a demand for 100 hotel-beds per night.

19 The proposed commercial uses comply with London Plan policy 4.7 ‘Retail and town centre development’ which sets out that retail, commercial, culture and leisure development should be focused on sites within town centres and that where no such sites are available, site on the edges of town centres that can be well integrated with the existing centre and public transport. The applicant noted that an impact assessment will be undertaken in line with ‘Planning Policy Statement 4: Planning for sustainable economic growth’ to ensure that the proposed ‘restaurant quarter’ does not negatively impact on those existing town centre restaurants, particularly in Bromley Village North.

20 Overall, the mix of uses is acceptable and will contribute to creating a new sense of place that will enhance the overall vitality of Bromley town centre.
Housing

21 London Plan policy 3.3 ‘Increasing housing supply’ seeks to increase London’s supply of housing and sets a London-wide target of 32,210 additional homes per year until 2015/2016 when this target will be reviewed. Table 3.1 sets borough housing targets, of which Westminster’s is 770 additional homes per year between 2011 and 2021. London Plan Policy 3.4 ‘Optimising housing potential’ seeks to ensure that development proposals achieve the optimum intensity of use taking into account local context, the design principles of the London Plan and public transport capacity. This marks a departure from the previous approach of ‘maximising’ density to optimising site capacity. The proposals are for the provision of 200 residential units on the Westmoreland Road car park site, which will make a significant contribution towards the delivery of new housing in Bromley.

Affordable housing

22 London Plan Policy 3.12 ‘Negotiating affordable housing on individual private residential and mixed use schemes’ requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so, each council should have regard to current and future requirements for affordable housing at local and regional levels, its own overall target for affordable housing provision, and the need to encourage rather than restrain residential development and the specific circumstances of individual sites. It also notes that the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation and other scheme requirements.

23 Policy 3.11 states that borough targets should take account of matters including current and future housing requirements, the strategic targets and priority accorded to affordable family housing, the need to promote mixed and balanced communities, and the viability of future development, and that within those targets 60% of affordable housing should be for social rent, and 40% for intermediate rent or sale.

24 The proposal offers 22% affordable housing by unit, which falls short for the Bromley policy requirement requiring 35% affordable housing on this site. The applicant has cited the exceptional costs associated with providing a 400 space car park and a viability assessment has been submitted to demonstrate that this is the reasonable maximum amount of affordable housing that the scheme can support. It is understood that this appraisal is currently being independently appraised by the District Valuer Services on behalf of Bromley Council. Until the results of this assessment are known and have been shared with officers it is not possible to determine whether the proposal complies with strategic planning policy 3.12 relating to affordable housing provision.

Tenure split and unit mix

25 Policy 3.12 of the London Plan states that within the 13,200 affordable homes per year target, the Mayor will, and boroughs and other partners should, seek to ensure that 60% is social housing and 40% is intermediate. Planning Policy Guidance 3: Housing formally introduces affordable rent as a new affordable housing product. This shift in national housing policy is not currently reflected in strategic planning policies for London.

26 Affordable rent, although not operated under the same agreements as social rented housing, is considered an affordable housing product, and is intended to be available to those eligible for social rented housing. It is also solely a rented product, as opposed to intermediate housing, which typically involves an element of sale to the occupier. In the recent funding programme issued by the Homes and Communities Agency for the period 2011 to 2015, it has
been made clear that funding for social rented products will only be supported in limited circumstances.

27 The applicant has selected a preferred social housing provider and the proposed tenure split of the affordable housing element (46 units of 200) is as follows: 7 one-bedroom and 16 two-bedroom apartments in the affordable rent offer and 13 one-bedroom and 10 two-bedroom shared ownership apartments. The affordable housing provision represents 23% of the total residential proposals by unit. The proposed 50:50 tenure split between affordable rented accommodation and intermediate provision should be justified in light of Bromley Council’s housing requirements. The applicant should also provide further information on the proposed rent levels for the affordable rented element to demonstrate that they are likely to meet local housing need.

28 The proposed unit mix is set out as follows:

<table>
<thead>
<tr>
<th></th>
<th>Affordable rent</th>
<th>Shared ownership</th>
<th>Market</th>
<th>Total</th>
<th>Total %</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-bedroom</td>
<td>7</td>
<td>13</td>
<td>40</td>
<td>60</td>
<td>30%</td>
</tr>
<tr>
<td>2-bedroom</td>
<td>16</td>
<td>10</td>
<td>110</td>
<td>136</td>
<td>68%</td>
</tr>
<tr>
<td>3-bedroom</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>4</td>
<td>2%</td>
</tr>
<tr>
<td>Total</td>
<td>23</td>
<td>23</td>
<td>154</td>
<td>200</td>
<td>100%</td>
</tr>
<tr>
<td>Tenure split</td>
<td>11.5%</td>
<td>11.5%</td>
<td>77%</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>

29 London Plan policy 3.8 encourages a genuine choice of homes in terms of affordability, size and type. Policy 3.11 states that within affordable housing provision, priority should be accorded to family housing. This is supported by the London Plan Housing Supplementary Planning Guidance, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Recent guidance is also set out in the London Plan Interim Housing Supplementary Planning Guidance (April 2010).

30 The proposal is offering an over-provision of 2-bedroom units and includes no family sized accommodation units within the affordable housing offer. At the pre-application stage it was noted that this shortfall in the housing offer should be addressed through the inclusion of 3-bedroom units, to take account of Policy 1.1C of the London Housing Strategy, which sets a strategic target for 42% of social rented homes to have three or more bedrooms and address this in the proposed unit split. However, the applicant has cited the town nature and flatted nature of the scheme to justify the lack of family-sized affordable accommodation in the proposal mix. In order to be satisfied that the overall housing mix meets local needs, details of discussions with the Council’s housing department and how the unit mix was arrived at, should be provided before the application is reported back at Stage 2.

Density

31 As noted above, London Plan Policy 3.4 outlines the need for development proposals to optimise development density of use as far as is compatible with the local context, the design principles and public transport capacity. Table 3.2 of the London Plan provides guidelines on density. The site is a highly accessible town centre site located close to main transport links and
falls within a public transport accessibility level (PTAL) range of 4 to 6 (PTAL 6a), as categorised within the London Plan. It is estimated that the scheme will yield 208 residential units per hectare, with an average of 2.7 habitable rooms per unit. In a ‘Central’ location for the purposes of assessment, a range of between 215-405 units per hectare is deemed appropriate. The proposed scheme therefore falls marginally below the lower figure in this range. However, given the vertically mixed nature of the development, the density is more accurately calculated based on the net residential site area, excluding non-residential floorspace (this methodology is set out in paragraph 3.35 of the Mayor’s Interim Housing SPG). The applicant should therefore submit the revised density figure in this context.

**Children’s play space**

32 Policy 3.6 of the London Plan sets out that “development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that there will be approximately 39 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for approximately 400 sq.m. of playspace.

<table>
<thead>
<tr>
<th>Table 2 children’s playspace</th>
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</thead>
<tbody>
<tr>
<td><strong>Breakdown by age</strong></td>
</tr>
<tr>
<td><strong>Affordable rented</strong></td>
</tr>
<tr>
<td>0-4</td>
</tr>
<tr>
<td>5-10</td>
</tr>
<tr>
<td>11-15</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
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</table>

33 This development does not provide integrated playspace. The submitted planning statement sets out that:

“... the nature of this mixed-use Town Centre development scheme does not lend itself to the effective provision of children’s play space on-site. Furthermore, the scheme includes a very substantial financial investment in public open space on site, which takes precedence over any financial contribution towards enhanced provision of offsite children’s play space, with the former meeting the broader objective of creating positive public realm for the benefit of the scheme and the Town Centre generally. Therefore, this application proposal must be assessed on its individual planning merits”.

34 It is accepted that the opportunities for the provision of dedicated playspace on site may be limited. However, if no provision whatsoever is made, then it will be appropriate for contributions to be made towards existing play facilities in the surrounding area and these should be secured as part of the legal agreement.

35 The proposals do not comply with London Plan policy 3.6 relating to children’s playspace.

**Urban design**
36 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

Uses, layout and routes

37 The proposal would be physically isolated from the main town centre retail and leisure uses, but still forms part of its offer. Therefore, connectivity of the proposal with the town centre will be key to the success of the proposal, both to benefit the regeneration of the town centre, and the proposed development. Legibility of the proposal should be integrated within improved town centre wayfinding, and the proposals to improve the route through the RBS building, which would form the key route to the scheme from the town centre and railway station, is welcomed.

38 The arrangement of uses is supported, and the proposed A3 and leisure uses would be appropriate, subject to controls on hours of operation, with regard to potential noise issues for residential occupiers. The mix of uses would be focused around a civic-type space that would act as a focal point for the scheme, with the main site exit facing the locally listed building; this layout would offer a reduction in intensity from the centre (‘halo’) of the development, towards Westmoreland Road. The engagement of the various uses – cinema, hotel, retail and residential – with this space would have the potential to contribute to a lively and interesting zone throughout the day and into the evening. The proposed hotel use is supported, although the access from Westmoreland Road will require clear signage to direct those arriving by taxi. The site edges, away from the public areas, would be secure and the delineation between public and private space is clear.

39 The detached house at 2 Westmoreland Road is proposed for demolition as part of the development. Although it does not have heritage significance, and is in poor repair, it offers a good relationship with the street. However, the replacement buildings are supported in terms of their role in creating a suitable gateway to the scheme from Westmoreland Road, and revisions to the scale of the entrance following GLA pre-application discussions are welcomed. The new buildings offer a more appropriate response to the creation of the new town-centre based context, compared with the retention of the existing house.

Scale and massing

40 The proposed scale is appropriate to this town centre site. The siting of a tall building on the site is supported; given the lack of a direct, visible route from the high street to the site, the role of a tall building as a visible marker of the proposal most appropriate solution. The tall building’s triangular shape would offer landmark qualities that would also improve the legibility and recognition of the town centre when viewed from a distance. The scale of the north-south buildings flanking the public space would provide suitable but not overbearing enclosure of the space. The raised podium offers reasonably level access to the station via the RBS route whilst dealing with the challenge of providing car parking and servicing facilities.

41 The massing of the blocks is also appropriate, with the mass of the tall building broken down with the addition of window grids, recesses and balconies. Although the hotel has been designed with the regular patterns and small windows normally specified by operators, the brave
facade treatment and interesting evening illumination will strengthen its role within the ‘entertainment hub’ concept of the site. This treatment and the curved response to the site entrance at Westmoreland Road would contribute to the town centre gateway qualities of the site, and is supported.

42 At the pre-application stage, concerns were expressed by GLA officers regarding the scale of the buildings closest to the abutting residential boundary along the western edge of the site. The reduction in the scale of these buildings since the pre-application stage is welcomed, and provides a transitional response between the adjoining dwellings and the scale of the town centre. The scale of the development is comparable with the car park currently on the site; the exception is dwellings towards the south of the site, which do not currently face the car park and would have a new structure visible from the rear of their properties. The applicant’s drawings demonstrate that the separation between these homes and the new buildings would be approximately 17 metres at the closest point.

43 The interface between the buildings at 4-10 Westmoreland Road and the new development is transitional, blending elements of the commercial development (and advertising to the street the podium uses within the scheme) while respecting the domestic scale and residential use of the adjoining buildings. The continuation of the building line of 4-10 Westmoreland Road into the site is appropriate.

Landscape and appearance

44 Given the challenges posed by the access into the development, the architecture and landscaping would be successful in providing entrance into the site, specifically from Westmoreland Road. The use of certain themes - such as the use of the colour yellow in the materials and within the RBS pathway into the site - to draw visitors from into the site is supported. The integration of a clear signage strategy within the architecture and landscape is also welcomed, as this offers the opportunity for useful and attractive integration, rather than appearing to be ‘tacked on’ later.

45 The central open area would have an art feature (the ‘halo’) as its focus. The choice of wire suspension would add a limited but tangible sense of upper enclosure of the space, and could also be used for illumination or other decoration. Bermondsey Square is a successful example where this approach has been used.

46 The proposed appearance of buildings, and materials is supported. The external design of each building would clearly reflect each internal use. The hotel has a practical façade, but offering interest through juxtaposition in materials - especially within an irregular pattern - is interesting, and its extension around to the Westmoreland Road frontage would assist in the legibility/signage issues referred to previously. The strong form of the main residential building is well articulated, which would successfully mitigate any impression of bulkiness.

Residential quality

47 Policy 3.5 of the London Plan introduces a new policy on the quality and design of housing developments. Part A of the policy states that housing developments should be of the highest quality internally, externally and in relation to the wider environment. Part C of the policy states that new dwellings should generally conform with the dwelling space standards set out in Table 3.3, have adequately sized rooms and convenient and efficient room layouts. Part E of the policy states that the Mayor will provide guidance on implementation of this policy including on housing design for all tenures. The reasoned justification provides further guidance and explanation. In particular, paragraph 3.32 makes clear that “Securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities”. The Mayor’s
draft Housing Design Guide (July 2009) and the draft replacement Housing SPG (December 2011), provides further guidance on the implementation of these policies.

48 Core frequency within the development is good, and complies with the guidelines within the draft replacement Housing SPG. As noted at the pre-application stage, some of the core entrances could benefit from being slightly wider to assist in the ‘home as a place of retreat’ aspirations of the SPG, but legibility of the entrances is good. The incorporation of a central residential concierge is welcomed.

49 Several of the flats within the tall building would have a north-facing single aspect, although they are set slightly to a west-facing angle. The application’s daylight and sunlight assessment demonstrates that a small number of flats would receive inadequate levels of light. This is not acceptable, and as such the applicant should investigate whether an alternative interior configuration is possible, to allow the main living areas to achieve satisfactory levels of daylight and sunlight.

50 The applicant’s noise assessment notes flats at the lower levels of this facade would have noise levels within the Noise Exposure Category (NEC) ‘C’ (as set within PPG 24 Planning and Noise) and the applicant should advise of what mitigation will occur on these north-facing flats, given the combination of high noise levels and their north-facing aspect, which combined could result in poor standards of accommodation. Higher noise levels are likely to be received on areas close to Westmoreland Road; in this case, GLA officers are satisfied that adequate noise attenuation can be achieved within the proposed design.

51 The applicant’s design and access statement notes that the proposed dwelling sizes would be in accordance with the space standards set out within the London Plan.

52 The proposal should set out a play space strategy, and describe the size, locations and functions of such space within the design and access statement. Opportunities for play space appear limited within the site, specifically doorstep play. Further advice on play space requirements is provided elsewhere within this report.

Conclusion

53 While some of the design improvements suggested at the pre-application stage have been implemented, there are some remaining areas of concern and these should be addressed to ensure full compliance with London Plan policies relating to design.

Tall buildings / views

54 London Plan (2011) policy 7.7, which relates to the specific design issues associated with tall and large-scale buildings, is of particular relevance to the proposed scheme. This policy sets out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

55 The proposal site is not affected by any of the strategic views as set out within the London View Management Framework, but will be subject to local authority assessment of local views. Furthermore, the revised London Plan notes the impact of tall buildings on local character. The views assessment demonstrates that the tall building would be significantly visible in views from the suburban roads to the south and west of the site. Additionally, as a result of the elevated position of the development when compared with these areas, some of the lower rise buildings
would also be visible. There would be an impact on the character of these suburban streets, although this needs to be balanced against their location on the edge of a major town centre containing existing tall buildings. As such, it is not considered that there would be any detrimental issues on character at a strategic level.

56 Heritage considerations should also be taken into account, and although are no statutorily listed buildings that would be detrimentally affected by the proposal, the locally listed St Mark’s Church would be affected. Given the context of the site and existing physical features such as the heavily trafficked Westmoreland Road, as well as the distribution of the proposal’s massing, this impact would not be detrimental.

57 The applicant’s assessment is a fair reflection of the likely impact of the scheme and the proposal therefore comply with London Plan policy 7.11 relating to views management.

**Access and inclusive design**

58 London Plan policy 7.2 ‘An inclusive environment’ seeks to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum as required by building regulations). This and all developments should seek to exceed minimum access requirements in all elements of the proposal, but particularly relating to the residential component and the public realm. Design and access statements should explain the design thinking behind the application and demonstrate how the principles of inclusive design, including the specific access needs of disabled and older people, have been integrated into the proposed development and how inclusion will be maintained and managed. The development should aim to meet the highest standards of accessibility and inclusion.

59 Also relevant for this application is London Plan Policy 7.1 Building London's Neighbourhoods and Communities, which seeks to ensure that proposals meet the Lifetime Neighbourhood principles - that places should be designed to meet the needs of the community at all stages of people’s lives; and London Plan Policy 2.15 Town Centres which promotes safety, security and lifetime neighbourhoods in Town Centres and the provision of Shopmobility Schemes and other measures to improve access to goods and services for older and disabled Londoners. This proposal provides the opportunity to demonstrate exemplary inclusive design that enables disabled and older people as well as families with small children to enjoy and benefit from the full range of opportunities available in the town centre.

**Public piazza**

60 The site presents particular challenges as there is a 5 metre change in level across the site (from St Mark’s church at the southern end to the RBS corridor at the northern end). In addition, the site is hidden from view and does not currently integrate well into the town centre pedestrian routes. In an attempt to overcome this, the architects have designed a public piazza through the centre of the site which includes ramps and ‘seating steps’ in addition to a ‘halo’ events space and circular bench. It was noted that these ramps and steps cannot be made to comply with Part M of the building regulations (the proposed gradient is 1 in 8, the absolute minimum allowed under the building regulations is 1 in 12 and even this is very steep) and instead will be treated as a landscape feature. A step/ramp free route is to be provided from street level at the Westmoreland Road end of the site via a lift that serves the basement car park up to the podium level.

61 It is appreciated that the level change here is excessive and it is very difficult to provide a gentle ramp up to the piazza but the provision of a single lift within the adjacent building as an alternative for those people who cannot manage the steps does not feel like an inclusive solution and would not allow some people to enjoy the graded landscaped and seating features proposed
here. It's recommended that further consideration is given to how this area could be designed so that everyone can enjoy this landscaped area - for example by providing lifts on both sides of this space that provide access to the intermediate levels as well as a direct connection between the street and the piazza. There is also concern that any accessible route which involves the use of lifts to negotiate the site should:

- Be linked into the surrounding pedestrian environment via a step-free and well sign-posted route;
- Require as few ‘interchanges’ as possible;
- Ensure that the lifts are clearly visible from and provided as part of the public realm (rather than hidden away) with the aim of giving users the same experience of the public realm features as is feasible; and
- Provide more than one lift to ensure accessibility is not lost, should one lift break down.

62 In terms of the external environment, the applicant’s landscaping strategy does not confirm that there are accessible routes through the public space and that access to and from the entrance cores and all of the commercial uses will be fully accessible. These routes should be clearly signposted as part of the proposed way-finding strategy. It is welcome that the provision of public toilets have been co-located adjacent to the public lifts as part of an inclusive approach which also allows ease of use by groups and families.

63 The submitted access strategy demonstrates that the multi-use events space in the centre of the piazza will be level with the surrounding areas and easily accessible for all users which is welcome. The provision of a choice of accessible seating in all areas, and careful choice of surface materials for the piazza, and materials to be used for the sculptural features, can help to provide a safe and comfortable space usable by everyone but should be chosen with consideration to the needs of visually impaired people.

Residential Units

64 London Plan Policy 3.8 ‘Housing choice’ requires that 100% of new homes meet the Lifetime Home standards and that 10% of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Typical flat layouts should be provided to demonstrate how each of the 16 points for Lifetime Homes will be met and how the wheelchair adaptable flats meet the key features of wheelchair accessible housing as set out in the GLA’s Best Practice Guide on wheelchair accessible housing. The applicant should also ensure that the latest version of the Lifetime Homes standards are being used to inform the design (published by Habinteg Housing Association in July 2010 (see www.lifetimehomes.org.uk)).

65 The proposal includes 10% wheelchair housing and these are to be provided across the range of unit sizes in order to ensure a genuine housing choice in accordance with London Plan policies (unless Bromley Council has through its Accessible Housing Register work (see http://www.london.gov.uk/priorities/housing/housing-need/lahr) identified particular local needs for wheelchair accessible flats of a particular size). As well as blue badge parking bays associated with the wheelchair accessible homes, there also needs to be flexibility for allocation of parking spaces as residential units are adapted in the future and for Blue Badge users who may reside in the Lifetime Home apartments and provision should be made for this through the parking management plan. All of the residential cores have two lifts which is welcome.
66 Extending the Lifetime Home concept to the neighbourhood level can help to ensure that the public realm, amenity spaces, the parking areas, the routes to and from the site and links to adjacent public transport and local services and facilities are all designed to be accessible, safe and convenient for everyone, particularly disabled and older people. This concept can also help to meet the specific needs of older people (see the CLG Lifetime Homes Lifetime Neighbourhoods National Strategy for Housing in an Ageing Society). Particular attention should be paid to ensuring that all the pedestrian links to the adjacent roads are level or gently ramped. The lighting design is particularly important to create safe, well and evenly light routes through and into the site. This is particularly important in the pedestrian link from the piazza through the RBS building which should be improved to provide a clearly legible and safe route if feasible.

Commercial uses

67 At the pre-application stage, there was some discussion regarding the possibility of the shop-mobility scheme being extended from the Glades shopping centre to this site and no further information has been provided on this. Given the retention of the town centre car park in this development, it may be appropriate to provide the space and funding for a satellite shop mobility scheme here, that provides a connection through the town centre to the Glades, enabling more disabled and older people to access and use this part of the town centre. Access to the hotel and the cinema, the proposed community facilities and the retained chapel will also need to be carefully considered, given the proposed use of ramps to address level changes.

68 The hotel element of the proposal provides 7.5% (plus 2.5% adaptable) wheelchair accessible bedrooms in line with London Plan Policy 4.5 and it has been demonstrated that the basement car park has sufficient space for the blue badge requirements for the hotel and commercial elements of the scheme. The location of the blue badge bays in the basement car park has been improved since the pre-application stage and better relates to the lift cores serving all the commercial and residential uses. It remains unclear how access to the hotel entrance lobby will be achieved for disabled people being dropped off by taxi given that the entrance is located at the upper level. Further consideration of this route should be undertaken as part of the reassessment of providing a more inclusive solution to this part of the public realm, possibly in connection with a rearrangement of the entrance into the retail unit on this corner.

69 The location of the wheelchair spaces within the cinemas should provide a choice in location and these spaces should not be located at the very front of the cinema which can be inaccessible to some users (see Muscular Dystrophy Trailblazers recent report on access to cinemas http://www.mdctrailblazers.org/news/869). Given the number of screens proposed consideration should be given to whether one lift is sufficient to deal with demand at peak times.

70 It was noted at the pre-application stage that the applicant is working closely with a specialist access consultant and while this is welcome, further discussion is required to ensure that all the access issues associated with this challenging site can be adequately addressed. It is recommended that a planning condition is applied to any permission requiring the ongoing use of a specialist access consultant to ensure the full accessibility of the site and its successful integration into the town centre.

71 There are several matters which require further clarification before the proposals can be considered compliant with London Plan policy 7.2.

Transport

72 400 car parking spaces are being proposed as part of the redevelopment of the site. It is understood that 300 of these are intended to serve both the town centre and the commercial
aspect of the development. The remaining 100 spaces are intended for the exclusive use of the residential element (0.48 spaces per unit). While Transport for London (TfL) would encourage this level of residential provision to be further reduced given the highly accessible nature of the site, it is however acknowledged that is within the maximum London Plan standards and therefore ultimately considered acceptable. It is understood that most of the town centre is already covered by a controlled parking zone (CPZ), which should prevent on-street parking by users of the commercial aspect of the development. TfL would however, additionally recommend that occupiers of the proposed development be prevented from obtaining on-street residents parking permits, and that this requirement is secured either by condition, or through the section 106 agreement.

73 Twenty active electric vehicle charging points (EVCP) are being proposed on site. While TfL would encourage this to be increased, this level of provision could be considered acceptable in this instance given that 300 parking spaces are intended to replace existing facilities. These spaces will however need to be closely monitored through the travel plan to ensure the activation of any additional charging points should they be required, with a further spaces being provided as passive provision in this regard.

74 To restrict residents of the proposed development from making use of the commercial parking spaces and vice versa, a secure gate or barrier is proposed. This is supported and TfL would request that the requirement to implement this measure be secured by condition within a car parking management plan for the site. It should also be ensured that blue badge parking spaces are provided in accordance with London Plan standards, as per TfL’s letter dated 26 January 2012.

75 As further detailed in its letter dated the 26 January 2012, TfL queries the trip generation and modal split presented in the Transport Assessment. The rationale behind the site selection should therefore be further explained, in order to ensure that it is appropriate and robust. Furthermore, the ‘worst case’ assessment methodology presented to assess the development impact remains unclear, and the rationale behind the approach taken should therefore be detailed. Given the land uses involved, weekday and weekend travel patterns will be different and as such need to be assessed separately.

76 It has been assumed that there will be no change in flows to the town centre car park aspect of the application, despite its reduction in capacity. Whilst this assumption will be robust when it comes to local junction capacity testing, TfL would however question whether there may be any wider highway impacts caused by demand migrating to other car parks, particularly during the construction phase. This should therefore be clarified and addressed. Given the above, TfL will be unable to comment further on the potential highway impact until the issues raised with regards to the trip generation have been resolved.

77 As with the highway impact, further feedback on the potential public transport impact will be provided by TfL, once questions around the trip generation exercise have been satisfactorily resolved, as further detailed above. TfL will also be in a better position to advise if any contributions will be required towards public transport capacity enhancements, notably on the bus network.

78 The development proposes changes to the existing bus stands on Simpson’s Road. While this is acceptable in principle, the swept path analysis shown in the Transport Assessment (TA) is a concern to TfL. It demonstrates that the proposals will require buses to use the opposite carriageway to turn, which is unacceptable. Given the inherent safety risk in this manoeuvre, a detailed design and full road safety audit should be provided. Further discussions with regards this proposed arrangement and how this method of operation could occur safely are therefore required before it could be regarded as acceptable, and in compliance with London Plan policy 6.2. Additionally, should a 15.5 metre coach need to use the turning circle this may prove less
manoeuvrable than a bus and should therefore also be tracked. It also appears that any vehicles parked on Simpson’s Road would stop the site being usable by buses, and therefore further information on what highway restrictions will need to be in place, and how they will be enforced should be submitted. A cross-section showing vertical clearances into the bus turnaround area would also be useful.

79 It is proposed to provide temporary bus standing on Ringers Road during the construction period. Further discussions on the resultant service patterns and the form that any provision will take, are however required before this arrangement can be considered acceptable and in accordance with London Plan policy 6.2. The TA states that bus drivers would have access to the toilet and refreshment facilities being provided in the public part of the development, which is supported. TfL would request that the requirement for bus drivers to have 24 hour access to toilet facilities for the lifetime of the development is secured through the s106 agreement.

80 As further detailed in TfL’s letter, given Bromley South’s role as a ‘strategic interchange’, an analysis of station congestion is recommended. There may be a requirement to contribution towards station upgrades, with the aim or relieving congestion, in accordance with proposal 46 of the Mayor’s Transport Strategy (MTS).

81 As a hotel is being proposed on site, coach parking should be provided in accordance with the London Plan standards. Given the location of the site, TfL would however be willing to apply some flexibility to this standard, and is therefore supportive of a coach drop off and waiting area being located adjacent to the proposed bus stand, providing drivers with access to the same rest as facilities detailed above.

82 While it is disappointing that a full pedestrian audit (e.g. PERS) has not been undertaken, it is acknowledged that some consideration has been given to the quality of pedestrian routes and public transport waiting areas. As such, the improvements proposed to the public realm within the development site and the links on the existing route between Westmoreland Road and the High Street are supported. Given the location of the site, its proximity to the station and the land uses proposed, TfL would strongly encourage the implementation of measures to assist pedestrian wayfinding in the area, in accordance with London Plan policy 6.10. It is understood that the borough is looking at a signage strategy for the whole of the town centre, including this site, with the provision of Legible London as being one of the options considered. This would be strongly supported and TfL would encourage any improvements to be secured through the s106 agreement.

83 84 publicly accessible cycle parking spaces are being proposed within the public realm of the proposed development. Separate, secure cycle parking for staff of the commercial aspect of the development, including the provision of showers and locker facilities, is also being proposed. This is supported by TfL, as being in line with London Plan standards. The provision of an additional 205 cycle parking spaces for the residential aspect of the development is also acceptable. These are proposed to be provided by way of a Josta double-rack system, and while this is considered acceptable, the location and method of access should still be confirmed. It is also unclear whether residents would be expected to cycle through the basement car park or use the public lifts to access the facilities, and confirmation that the lifts are of a sufficient size should therefore also be provided. Notwithstanding the above, TfL’s preference would be for a residential cycle store that can be accessed directly from ground level.

84 A Framework Travel Plan has been submitted for the site, with the aim of the individual land uses developing their own Travel Plans within the context of the site-wide plan, which is considered acceptable. As the Travel Plan contains all the information considered relevant for the planning stage, TfL would recommend that it is secured, managed, monitored and enforced through the s106 agreement. In accordance with London Plan policy 6.3, TfL would also
recommend that both a Construction Logistics Plan (CLP), and a Delivery and Servicing Plan (DSP) be secured for the site by condition. These should identify efficiency and sustainability measures to be undertaken both while the development is being built, and once it is operational.

85 In summary, additional information as further detailed above is required before the proposals could be considered to be in accordance with the transport policies of the London Plan.

**Sustainable development**

86 The London Plan climate change policies set out in Chapter 5 collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. London Plan Policy 5.2 ‘minimising carbon dioxide emissions’ sets out an energy hierarchy for assessing applications, London Plan Policy 5.3 ‘Sustainable design and construction’ ensures future developments meet the highest standards of sustainable design and construction, and London Plan Policies 5.9-5.15 promote and support effective adaptation to climate change. Further detailed policies on climate change mitigation and adaptation are found throughout Chapter 5 and supplementary guidance is also given in the London Plan sustainable design and construction SPG.

**Climate change mitigation**

**BE LEAN**

**Energy efficiency standards**

87 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation heat recovery (MVHR). The development is estimated to achieve a reduction of 88 tonnes per annum (23%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development.

**BE CLEAN**

**District heating**

88 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, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

89 The applicant is proposing to install a site heat network for the apartments. However, the applicant should confirm that all apartments will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. The site heat network will be supplied from a single energy centre. This will be 149 sq.m. in floor area and located on the ground floor of Block 9.

**Combined Heat and Power**

90 The applicant is proposing to install one 84 kW gas fired combined heat and power unit (CHP) as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated carbon
dioxide emissions of 27 tonnes per annum (9%) will be achieved through this second part of the energy hierarchy.

BE GREEN

Renewable energy technologies

91 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install solar photovoltaic panels on the roofs of the houses. A reduction in regulated carbon dioxide emissions of 14 tonnes per annum (5%) will be achieved through this third element of the energy hierarchy.

OVERALL CARBON SAVINGS

92 The estimated regulated carbon emissions of the development are 250 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account.

93 This equates to a reduction of 130 tonnes of carbon dioxide per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 34%. The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan.

Climate change adaptation

94 London Plan policies 5.1 to 5.9 require development proposals to minimise carbon dioxide emissions in accordance with the energy hierarchy, demonstrate that sustainable design and construction standards have been employed, along with the use of decentralised energy networks, renewable and innovative energy approaches.

95 The application has been supported by the submission of a sustainability assessment which sets out that the proposal will achieve Code for Sustainable Homes Level 4 and BREEAM excellent level for the non-residential uses. The report also sets out how the proposal meets the standards set out in the Mayor's Sustainable Design and Construction SPG relating to the re-use of land; conservation of energy, materials water and other resources; use of natural systems; reducing noise, pollution, flooding and micro-climatic effects; comfort and security and biodiversity. In addition, the proposal includes green roofs.

96 The proposal complies with London Plan policies 5.1 to 5.9 relating to climate change adaptation but there are a number of matters which require further resolution to ensure compliance with London Plan policies relating to climate change mitigation.

Community Infrastructure Levy

97 In accordance with London Plan policy 8.3, the Mayor of London proposes to introduce a London-wide Community Infrastructure Levy (CIL) that will be paid by most new development in Greater London. Following consultation on both a Preliminary Draft, and then a Draft Charging Schedule, the Mayor has formally submitted the charging schedule and supporting evidence to the examiner in advance of an examination in public. Subject to the legal process, the Mayor intends to
start charging on **1 April 2012**. Any development that receives planning permission after that date will have to pay, including:

- Cases where a planning application was submitted before 1 April 2012, but not approved by then.
- Cases where a borough makes a resolution to grant planning permission before 1 April 2012 but does not formally issue the decision notice until after that date (to allow a section 106 agreement to be signed or referral to the Secretary of State or the Mayor, for example).

The Mayor is proposing to arrange boroughs into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floor space respectively (see table, below). The proposed development is within the London Borough of Bromley where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website [http://london.gov.uk/](http://london.gov.uk/). Within London both the Mayor and boroughs are able to introduce CIL charges and therefore two distinct CIL charges may be applied to development in future. At the present time, borough CIL charges for Redbridge and Wandsworth are the most advanced. The Mayor’s CIL will contribute towards the funding of Crossrail.

<table>
<thead>
<tr>
<th>Mayoral CIL charging zones Zone</th>
<th>London boroughs</th>
<th>Rates (£/sq. m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Camden, City of London, City of Westminster, Hammersmith and Fulham, Islington, Kensington and Chelsea, Richmond-upon-Thames, Wandsworth</td>
<td>£50</td>
</tr>
<tr>
<td>2</td>
<td>Barnet, Brent, Bromley, Ealing, Greenwich, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets</td>
<td>£35</td>
</tr>
<tr>
<td>3</td>
<td>Barking and Dagenham, Bexley, Croydon, Enfield, Havering, Newham, Sutton, Waltham Forest</td>
<td>£20</td>
</tr>
</tbody>
</table>

Local planning authority’s position

Bromley Council supports the proposals.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at
this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

101 There are no financial considerations at this stage.

Conclusion

102 London Plan policies on outer London, retail, hotel, leisure, housing, children’s playspace, urban design, views, access and inclusion, transport and sustainable development are relevant to this application. In general, the application complies with some of these policies and not with others, for the following reasons:

- **Principle of development**: the proposed land uses are acceptable and comply with London Plan policies 2.7 and 2.15 relating to town centres and Outer London and policies 4.6, 4.5 and 4.7 relating to mix of uses.

- **Housing**: it has not been possible to determine whether the proposals provide the ‘maximum reasonable amount’ in line with London Plan policy 3.12. The proposals do not comply with London Plan policies 3.8 or policy 1.1C of the Mayor’s Housing Strategy.

- **Children’s playspace**: the proposals do not comply with London Plan policy 3.6.

- **Urban design**: there are a number of detailed matters which were raised at the pre-application stage but still require further attention to ensure the proposal complies with the policies in chapter 7 of the London Plan.

- **Views**: the proposals comply with London Plan policy 7.11.

- **Access and inclusion**: the proposals do not fully comply with London Plan policies 7.1 and 7.2 relating to inclusive access.

- **Transport**: the proposals do not fully comply with London Plan policies 6.2, 6.10.

- **Sustainable development**: the proposals generally comply with London Plan policy 5.5 and 5.6 relating to decentralised energy and heat networks. They also comply with policies relating to sustainable design and construction.

103 On balance, the application does not fully comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Affordable housing**: the independent review should be submitted and family housing added to the mix. Further information should be provided on how the proposal meets local housing need, the proposed rent levels and the density.

- **Children’s playspace**: provision should be made to address playspace requirements.

- **Urban design**: the issues raised at the pre-application stage relating to the use of single aspect units should be addressed.
- **Access and inclusion**: further information is required and a planning condition is requested to ensure accessibility improvements are secured as part of the detailed design stage.

- **Transport**: further negotiation and information is required.

- **Sustainable development**: a drawing showing the route of the heat network linking all buildings on the site should be provided.

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