

Buckston Browne Farm, Downe

in the London Borough of Bromley

planning application no. 10/03267/FULL1

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

The alteration, extension and conversion of Buckston Browne Farm to four dwellings and the erection of three detached houses with garages and ten car parking spaces for the use of Downe House staff.

The applicant

The applicant is **Buckston Browne Developments Limited**, and the architect is **Clague Architects**.

Strategic issues

The main issues are whether 'inappropriate development' in the **Green Belt** for residential purposes is acceptable in strategic planning policy terms; whether 'very special circumstances' have been identified as required by PPG2; and whether the new development would harm the open character of the Green Belt. No **affordable housing** provision is required due to the context and size of the scheme.

Further information is required regarding **biodiversity** and **climate change**. There are no strategic **transport** issues.

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 63 of this report; but that the possible remedies set out in paragraph 64 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Bromley Council resolves to refuse permission, but it must be referred back if Bromley Council resolves to grant permission.

Context

1 On 8 November 2010 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 4 January 2011 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 Category 3D of the Schedule to the Order 2008: *"Development (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building"*.

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; or allow the Council to determine it itself, unless otherwise advised. In this instance if Bromley Council resolves to refuse permission it need not refer the application back to the Mayor.

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 1.2 hectares and it is designated Green Belt in Bromley's Unitary Development Plan (2006) and lies within a proposed World Heritage Site. It is 650 metres south-west of Downe Village, near Orpington, which is well-known for its connection with Charles Darwin. Down House, in which Darwin researched and wrote his seminal work 'On the Origin of Species,' is located just west of the site. Down House and garden is open to the public and it is managed by English Heritage. Down House and the surrounding area was added to the UK World Heritage List in 1999 but its World Heritage status is yet to be confirmed. The local area is characteristically rural, with low-density villages and large single dwellings interspersed in open meadow and woodland.

6 The site is bound by Little Pucklands Wood to the west and Great Pucklands Meadow to the south, both of which are designated sites of importance for nature conservation in the Bromley UDP. A public path leads along the eastern boundary of the site, which intersects Darwin's 'thinking path', the Sand Walk which leads into the gardens of Down House. There are two vehicular entrances into the site from West Hill, a narrow country road, which runs along the northern boundary.

7 The existing buildings on the site consist of a two and half-storey farmhouse which dates from 1933 and various single-storey laboratory buildings and outbuildings which were added between 1933 and the 1960s. The farmhouse is locally listed and it was built for the Royal College of Surgeons as a residential teaching and research centre. Both the farmhouse and the laboratory buildings are derelict and have not been occupied since 1989. The total floorspace of the existing buildings on the site is 3,229 sq.m. on a total built footprint of 2,960 sq.m. There is no formal car parking space but 1,742 sq.m. of the site is impermeable hardstanding.

Figure 1: Aerial view of Buckston Browne Farm



(Source: Google maps)

Details of the proposal

8 The application is for full planning permission for the restoration and conversion of the farmhouse into four dwellings, the demolition of the laboratory buildings and the construction of three new 5-bedroom detached houses between 1 and 1.5 storeys in height, each with a double garage. The total floorspace of the proposed buildings would be 1,690 sq.m. on a total built footprint of 1,392 sq.m.

9 20 car parking spaces are proposed, including six spaces for the use of English Heritage staff working at Down House. The proposed scheme additional landscaping and planting of native tree and hedge species at the site boundaries.

Case history

10 Planning permission for the change of use from medical research to a mixed-use development, comprising scientific research and education use with associated residential facilities and the siting of temporary classrooms, was granted by Bromley Council on 10 April 2003. The temporary classrooms were to be set up behind the existing farmhouse to provide teaching accommodation and classroom space prior to the development being built. The application was not referable under the Mayor of London Order 2000.

11 Bromley Council resolved to grant planning permission for a similar outline application, for the erection of a 1 to 2-storey building with an internal floor area of 4,645 sq.m. and associated

parking on the 8 May 2003, but did not consult the Mayor under Article 4 of the Town and Country Planning (Mayor of London) Order 2000. Subsequently, in May 2003 the Council consulted the Mayor on the application (03/00423), for the erection of buildings to accommodate scientific discussion and research and educational use with associated residential facilities. The Mayor supported the scheme and Bromley Council granted planning permission.

12 On 3 August 2006 Bromley Council consulted the Mayor on the renewal of this permission (06/02656). The application raised no significant strategic planning issues and the Mayor was content for Bromley Council to determine the application itself. Bromley Council renewed the permission on 1 February 2007.

13 On 5 January 2010 Bromley Council consulted the Mayor on a scheme for the alteration, extension and conversion of Buckston Browne House to four dwellings and the erection of five detached houses with garages and ten car parking spaces for the use of Downe House staff (09/03411/FULL1). On 10 February, the Mayor considered a report on that application reference 0559b/01 which broadly found the principle of the development acceptable but also raised a number of issues where the proposal did not comply with the London Plan. The scheme was withdrawn by the applicant shortly afterwards. The current proposal seeks the address the issues raised by the GLA and Bromley Council.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Green Belt/MOL *London Plan; PPG2*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Density *London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EiP draft*
- Urban design *London Plan; PPS1*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; PPS9; draft PPS Planning for a Natural and Healthy Environment*
- Climate change *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13;*

15 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 2006 Bromley Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

16 The Mayor's consultation draft replacement London Plan (October 2009) is also a material consideration to which appropriate weight should be accorded.

Green Belt and the principle for development

17 Bromley Council's 2006 UDP designates the entire site as Green Belt. Planning Policy Guidance 2, 'Green Belts' (PPG2) states that the purpose of a Green Belt designation is to check unrestricted sprawl and towns merging into one another; safeguard the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and urban land.

18 PPG2 also states that construction of new buildings in the Green Belt is inappropriate except for the following purposes: agriculture and forestry; essential facilities for outdoor sport and recreation; for cemeteries and other uses of land that preserve the openness of the Green Belt; limited extension, alteration or replacement of existing dwellings; and limited infilling of existing villages; and the limited infilling or redevelopment of major existing development sites identified in the adopted development plan. London Plan Policy 3D.9 reiterates PPG2 by stating that, "*there is a general presumption against inappropriate development in the Green Belt, and such development should not be approved except in very special circumstances.*" Draft replacement London Plan Policy 7.16 also reflects these principles.

19 The proposed construction of three new residential dwellings on the Green Belt does not meet any of the above criteria and so is by definition inappropriate development for which very special circumstances need to be identified.

20 In terms of the re-use and conversion of Buckston Browne Farmhouse in four residential dwellings, paragraph 3.7 of PPG2 considers states that "*the re-use of buildings should not prejudice the openness of Green Belts, since the buildings are already there.*" Paragraph 3.8 sets out criteria where re-use of buildings is not considered inappropriate:

- (a) it does not have a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land in it;
- (b) strict control is exercised over the extension of re-used buildings, and over any associated uses of land surrounding the building which might conflict with the openness of the Green Belt and the purposes of including land in it
- (c) the buildings are of permanent and substantial construction, and are capable of conversion without major or complete reconstruction; and
- (d) the form, bulk and general design of the buildings are in keeping with their surroundings.

21 The proposed restoration and conversion of the existing farmhouse into four separate residential dwellings is considered to fulfil these criteria and therefore is not inappropriate development.

22 The applicant has sought to demonstrate that 'very special circumstances' exist to justify the inappropriate development of the three new dwellings by showing that the harm by reason of inappropriateness to the Green Belt is outweighed by other consideration, such as the restoration of a local listed building and the lack of alternative uses for the site.

Restoration of a local listed building

23 The applicant states that the three detached dwellings proposed is the minimum amount of development necessary to finance the restoration of the farmhouse and remove the laboratory buildings, hardstanding and contamination from the site. It suggests that the conversion of the farmhouse would cover the cost of the redevelopment with a reasonable return but would not cover the removal of the laboratories and the general clean-up of the site. In response to the

previous application made in January 2010, the applicant was asked to provide a financial viability study to verify that then five detached dwelling proposed were minimum required to cover the cost of the redevelopment with a reasonable return. The applicant has stated that a financial viability study can be made available to officers. The Borough should verify this information.

Lack of alternative uses and previous permission

24 The applicant bought the site from English Heritage in 2004 with the view to developing the site for use as an educational forum. Outline planning permission for this use was granted in 2004. The applicant states that it has found it impossible to raise funding for the proposed scheme and is therefore seeking to put residential development on the site as it is a viable alternative to the approved educational scheme. The applicant states that the previous permission establishes the principle of replacing the laboratory buildings with new buildings but that it is not viable and the site will only decay further if it is not used for residential purposes is acceptable.

Openness of the Green Belt

25 In addition to identifying 'very special circumstances' to justify the inappropriate development, as discussed above, the applicant must also demonstrate that the development would preserve or enhance the local character of the Green Belt. Annex C of PPG2 addresses the planning of Major Development Sites in the Green Belt and Annex C4 of PPG2 notes that redevelopment within the Green Belt may offer opportunity for environmental improvement without adding to their impact on the openness of the Green Belt. It notes that in these circumstances development should:

- (a) have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and when possible have less;
- (b) contribute to the achievement of the objectives for the use of land in Green Belts;
- (c) not exceed the height of the existing buildings; and
- (d) not occupy larger area of the site than the existing buildings (unless this would achieve a reduction in height which would benefit visual amenity)

26 Whilst this site is not designated a Major Development Site, it is useful to test the impact of the proposed development on the openness of the Green Belt against these criteria. As there is an expired outline permission for development on the site, the impact of the proposed development will be compared with both the site as it exists currently and the expired permission. The total footprint of the proposed buildings is 1,392 sq.m., 53% smaller than the existing buildings on the site and 56% smaller than the approved educational forum. The removal of the 1,742 sq.m. of impermeable hard standing on the existing site in the proposed development and its replacement with gravel and green open space, as well as the proposed landscaping and boundary treatments, is also likely to have a positive impact on the open character of the Green Belt.

27 However, whilst the proposed new-build houses have been reduced in height in comparison to the previous scheme submitted in January, elements of the three proposed houses are still 0.8 metres taller than the existing laboratory buildings currently on the site. Given that this is a relatively small increase in height and it will only apply to one 'wing' of each of the three houses, the impact on the very sensitive views from Down House and Gardens, the Sand Walk and the adjacent sites of importance for nature conservation is likely to be minimal. The applicant has sought to demonstrate that protecting these views has been central to its design process. The applicant has allowed for a 20-metre buffer zone of green space between the dwellings and the southern boundary and intends to plant additional native trees to increase screening. Furthermore, the existing screening minimises the impact of the increased height of units on the views from

Down House and the Site of Importance for Nature Conservation is minimal and does not impact on the open character of the Green Belt.

28 The argument that further development is required on the site in order to finance the removal of the laboratories and cleaning up of the site, and that there are a lack of viable alternative uses for the site, constitutes 'very special circumstances' in line with PPG2, subject to the Borough verifying the financial viability information. Furthermore, the impact on the openness of the Green belt is likely to be minimal and the removal of hardstanding and general 'clean up' of the site will enhance the site. Therefore, the 'very special circumstances' put forward are accepted in principle, subject to the Borough confirming the financial viability information put forward by the applicant, and the application complies with London Plan Policy 3D.9 and draft replacement London Plan Policy 7.16 in principle.

Affordable housing and density

29 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

30 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

31 Policy H2 of the Council's UDP has set an overall target of 35% of total new residential units, on sites capable of accommodating ten units or more, to be provided as affordable. An Affordable Housing Supplementary Planning Document (SPD) was adopted in March 2008, which expanded on UDP policy H2 and how the Council expects the policy to operate.

32 The applicant has not included any affordable housing provision on the site. London Plan Policy 3A.11 sets out that affordable housing is normally required on a site which has a capacity to provide ten or more homes. Seven units are proposed on the site but the applicant states that the site has the capacity for 36 units based on current government density guidelines. London Plan Policy 3A.3 indicates that development proposals should achieve the maximum intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. Given the sensitive rural context of the site, the actual capacity is far lower than 36 units. The capacity of the site is therefore considered to be below the threshold that the Mayor would seek an affordable housing contribution.

Children's playspace

33 Policy 3D .13 of the London Plan sets out *that "the Mayor will and the boroughs should ensure developments that include housing 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 five children within the development. As this is below the minimum threshold of ten children stated in the SPG, the applicant is not required to provide dedicated playspace on the site.

Urban design and access

34 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B, which address both general design principles and specific design issues. London Plan Policy 4B.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 specific issues. London Plan policies 4B.9 and 4B.10, which set out specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and views. The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (Policy 7.1).

35 The Mayor has published his London Housing Design Guide (Interim Edition). Although this is not a supplementary planning guidance, the principles within it should help the scheme to demonstrate consistency with London Plan strategic design principles. This should be used to inform all design aspects of the planning application.

Layout, scale and appearance

36 The demolition of the laboratories will open up opportunities for a new development, to improve the appearance of the derelict site. The restoration of the locally listed Arts and Crafts style Buckston Browne House building to provide four houses is welcomed. The new landscaped communal garden to the south of the farmhouse building would improve its setting and provide an internal green open space for the new buildings.

37 The proposed front entrances for the units in the farmhouse building are well positioned to provide active frontage to the 'front' of the development. The proposed residential scheme will result in a reduction of building footprint, floor area, and hardstanding compared to that of the existing buildings on site. The principle of developing a residential scheme on this Green Belt and the proposed World Heritage Site is generally supported.

38 The new dwellings will compose of predominantly single storey elements which would minimize impact on views from the surrounding landscape. The maximum height of proposed buildings is 1.5-storey, this is considered appropriate for the setting of the area.

39 The siting, massing and scale of the three new dwellings are considered appropriate to the setting of the area. Plots 6 and 7 have been grouped tightly together in order that both of them fit behind the footprint of the farm house. They have been arranged so as to keep views through from Westhill open and this would help preserve the openness of the greenbelt.

40 In terms of elevational treatment, it is recommended that additional fenestration be introduced to the north elevation of Plots 6 and 7 in order to reduce the amount of inactive frontage fronting onto the new gravel loop road.

Landscape design

41 The rationale of creating a new communal garden as setting for the Buckston Browne House, and a new no-build green 'corridor' as amenity space for the new houses is supported, as it helps to connect the proposed development to the surrounding open space in landscape terms.

42 The concept of introducing additional native tree species to the southern boundary would help to reinforce the existing screen planting around the site. The proposed removal of mature conifers as suggested by English Heritage is acceptable if it is properly managed and timed so it does not pose an adverse impact on the established character of the surrounding area, especially when the site is viewed from Sandwalk.

43 The rationale of creating a 'green corridor' of no-build zone to the southern boundary of the site is supported. This 'green corridor' will be 20 metres wide and be planted with a dense growth of native trees which would help screen the new development, particularly for view from direction of the Sandwalk.

Impact on the greenbelt

44 The design and access statement includes a visual impact analysis containing photomontage CGI views. It demonstrates that the design of the proposed scheme has considered its impact on views to the site from various key locations, such as views towards the site from Sandwalk and the public rights of way approaching the south which are sensitive. Officers are therefore content that the visual impact of the proposed scheme on the green belt is likely to be minimal.

Conclusion

45 The proposals to convert the Buckston Browne Farmhouse into dwellings, and the development of detached dwellings are fully supported. The residential scheme has been generally designed to a good standard, and will improve views within and into the site. The submitted design and access statement has demonstrated that the impact of the proposed Charles Darwin Forum building on the open character of the Green Belt is likely to be minimal, and that the scale and siting of the majority of the new dwellings are generally sensitive to the surrounding environment. In this respect, the development complies with PPG2.

Climate change

Climate change mitigation

46 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change.

47 The applicant submitted an energy statement 17 December 2010, which did not leave sufficient time for it to be assessed before the stage one consultation period ended. It is therefore not possible to determine whether the proposal complies with London Plan Policy 4A.3 – 4A.7. An assessment of the submitted energy statement will be sent separately to the applicant.

Climate change adaptation

48 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water. The draft replacement London Plan

also includes policies to ensure the development makes the fullest contribution to London's adaptation to climate change.

49 The applicant has stated that it intends to build the development to comply with level four of the Code for Sustainable Homes. As part of the requirements of level four the applicant has stated it intends to: achieve very low levels of water use through efficient fixtures and fittings; collect and recycling rainwater; use passive design techniques to enhance natural daylight.

50 To ensure the development complies with London Plan Policy, the applicant should confirm that the maximum water target per person per day and indicate how it will limit overheating caused by solar gain.

Biodiversity

51 London Plan Policy 3D.14 'Biodiversity and nature conservation' promotes a proactive approach to the protection, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy'. It states that *"where development is proposed which would affect a site of importance for nature conservation or important species, the approach should be to seek to avoid adverse impact on the species or nature conservation value of the site, and if that is not possible, to minimise such impact and seek mitigation of any residual impacts."*

52 The site is adjacent to the West Kent Golf Course and Down House Site of Metropolitan Importance for Nature Conservation (SINC), the highest category of ecological value ascribed sites in London below national importance. Given the strong relationship between the natural history of the area and its proposed World Heritage status, it is disappointing that the information submitted focuses on the landscape setting of the site and possible impact on the proposed World Heritage Zone at Down House rather than the ecological impact of the development. The proposals do not, however, encroach upon or directly affect the SINC. There is some potential for indirect impacts during construction, which should be addressed by inclusion of appropriate measures within a code of construction practice for the scheme, and within its detailed design.

53 Policy 3D.14 also states that development which would have a significant adverse impact on the population or conservation status of protected species should be resisted. It is disappointing that the amphibian and bat surveys date both date from 2005, as the use of the site by protected species could have changed since the survey was undertaken. The bat survey submitted by the applicant confirms that bats have used the farmhouse building as a roost site and therefore a DEFRA EPS licence application is required.

54 To comply with policy 3D.14 the applicant should include appropriate measures within the code of construction practice for the scheme. It should also carry out a confirmatory survey of roost status and foraging bat activity prior to development works, and ensure that appropriate measures are included within the code of construction practice for the development to minimise the risk of adverse effects on the bat population. This information should be provided to the Borough.

Transport

55 Given the nature of the proposals, TfL considers that there are no strategic transport implications arising from this application. However, on-site car parking should not exceed London Plan standards for residential developments, and cycle parking should be provided in accordance with TfL's cycle parking standards

Local planning authority's position

60 Bromley Council's position is unknown.

Legal considerations

61 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. 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

62 There are no financial considerations at this stage.

Conclusion

63 London Plan policies regarding the Green Belt, affordable housing, children's playspace, design, access, energy, climate change and biodiversity are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Green Belt:** The argument that further development is required on the site in order to finance the removal of the laboratories and cleaning up of the site, and that there are a lack of viable alternative uses for the site, constitutes 'very special circumstances' in line with PPG2, subject to the Borough verifying the financial viability information. Furthermore, the impact on the openness of the Green belt is likely to be minimal and the removal of hardstanding and general 'clean up' of the site will enhance the site. Therefore, the 'very special circumstances' put forward are accepted in principle, subject to the Borough confirming the financial viability information put forward by the applicant, and the application complies with London Plan Policy 3D.9 and draft replacement London Plan Policy 7.16 in principle.
- **Housing:** The capacity of the site is below the threshold that the Mayor would seek an affordable housing contribution as set out in London Plan Policy 3A.11 and the application therefore complies with the London Plan in this regard.
- **Children's playspace:** The number of children is likely to be below the minimum threshold of ten required by the Mayor's supplementary planning guidance 'Providing for children and young people's play and informal recreation' and therefore the application complies with 3D.13
- **Design and access:** The development broadly complies with London Plan policy contained in Chapter 4B.
- **Climate change mitigation:** Due to the late submission of documentation, it is not possible to determine whether the proposal complies with London Plan Policy 4A.3 – 4A.7.

- **Climate change adaptation:** To ensure the development complies with London Plan Policy, the applicant should confirm that the maximum water target per person per day and indicate how it will limit overheating caused by solar gain.
- **Biodiversity:** Further information is required to determine whether the proposal complies with London Plan Policy 3D.14.
- **Transport:** Given the nature of the proposals, TfL considers that there are no strategic transport implications arising from this application. However, on-site car parking should not exceed London Plan standards for residential developments, and cycle parking should be provided in accordance with TfL's cycle parking standards

64 The following changes might, however, remedy the above-mentioned deficiencies, and could lead to the application becoming compliant with the London Plan:

- **Climate change mitigation:** An assessment of the submitted energy statement will be sent separately to the applicant and further information may be requested.
- **Climate change adaptation:** To ensure the development complies with London Plan Policy, the applicant should confirm that the maximum water target per person per day and indicate how it will limit overheating caused by solar gain.
- **Biodiversity:** The applicant should carry out a confirmatory survey of roost status and foraging bat activity prior to development works and ensure that appropriate measures are included within the code of construction practice for the development to minimise the risk of adverse effects on the bat population.

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