

**COUNTRYSIDE PROPERTIES
(UK) LIMITED**

CHURCHILL QUARTER

**PLANNING STATEMENT
ADDENDUM**

DECEMBER 2018

5 Bolton Street
London
W1J 8BA

Tel: 020 7493 4002
Fax: 020 7312 7548

www.montagu-evans.co.uk

CONTENTS

<u>Section</u>		<u>Page No.</u>
1.0	Introduction	1
2.0	Scheme Amendments	3
3.0	Consultation Responses	6
4.0	Planning Balance and Conclusions	20

APPENDICES

1.0	Updated Drawing Schedule – CG-2 Rev A	
-----	---------------------------------------	--

1.0 INTRODUCTION

- 1.1 This Planning Statement Addendum has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for detailed planning permission by Countryside Properties (UK) Limited (the 'Applicant') for the redevelopment of land known as Churchill Quarter (the 'Site').
- 1.2 The application was submitted to the London Borough of Bromley ("LBB") on 14 May 2018 and was made valid on 8 June 2018 under application reference 18/02181/FULL1.
- 1.3 The current description of development for the application is as follows:

"Demolition of 1-40 Ethelbert Close, 2 Ethelbert Road, 102-108 High Street and miscellaneous buildings to the north of Ethelbert Close, and the redevelopment of the site (max height 17 levels) to provide a mixed use scheme comprising 410 residential units with a mix of Use Class A1, A2, A3, B1, D1, D2 uses at ground floor (part). New vehicular access from Ethelbert Road. Associated basement car and cycle parking. Car parking, access and servicing arrangements at Churchill Way. Public realm works including Library Gardens and ancillary development."

Purpose of the Planning Statement Addendum

- 1.4 The purpose of this Planning Statement Addendum is to provide further information in respect of the planning application (hereafter referred to as the Scheme). These submissions comprise amendments made to the development proposals submitted in May 2018 following ongoing consultation with officers at LBB, the GLA and various stakeholders and interested parties, as well as comprehensive responses to a number of issues raised through consultation comments to the application.
- 1.5 For ease of reference, the primary issues addressed within this addendum statement are summarised as follows:

Scheme Amendments

- Reduction in the height of Block B with the removal of one storey resulting in a maximum height across the proposed scheme of 14 storeys from podium level (16 levels including underground accommodation)
- Reduction in the number of residential units from 410 to 407;

- Alterations to internal layouts of wheelchair accessible flats in Block D to meet minimum space requirements for M4 3 2(b);
- Additional windows included on the rear elevation of Block G to enhance residential amenity standards;
- Introduction of triple glazing across the scheme; and
- Amendments to Churchill Way to delineate stopping up and proposed public highway.

Consultation Responses

- Bulk, scale and massing;
- Design and landscaping comments from GLA, officers at LBB and external consultants Tibbalds;
- Accessibility comments from housing services;
- Impact on Daylight and Sunlight;
- Energy and Sustainability from the GLA and LBB;
- Heritage and Impact on Conservation Area;
- Transport and Highways;
- Surface Water Strategy / Flood Risk;
- Ecology; and
- Secured by Design.

- 1.6 In the light of the above proposed changes, the description of development is amended as follows:

“Demolition of 1-40 Ethelbert Close, 2 Ethelbert Road, 102-108 High Street and miscellaneous buildings to the north of Ethelbert Close, and the redevelopment of the site (max height 16 levels) to provide a mixed use scheme comprising up to 407 residential units with a mix of Use Class A1, A2, A3, B1, D1, D2 uses at ground floor (part). New vehicular access from Ethelbert Road. Associated basement car and cycle parking. Car parking, access and servicing arrangements at Churchill Way. Public realm works including Library Gardens and ancillary development.”

2.0 SCHEME AMENDMENTS

2.1 Since the submission of the detailed planning application in May 2018, consultation has continued with LBB and with the Greater London Authority (“GLA”). In addition, various statutory and local resident consultation responses and representations have been received in relation to the application, all of which have been given further consideration by the applicant.

2.2 As a result of this consultation feedback, certain amendments have been made to the scheme proposals. In addition a number of consultation responses sought further clarification on particular elements of the scheme. These are addressed in **Section 3.0** and the supplementary material submitted.

Reduction in height of Block B

2.3 In response to the concerns regarding building heights, the scheme has been amended to reduce the height of Block B by one storey. As a result, the maximum height of the proposed development is now 14 storeys (16 levels including underground level). There is also a reduction in the number of residential units from 410 to 407. The revised unit mix is as follows:

- 166 x 1 bed (41%);
- 205 x 2 bed (50%); and
- 36 x 3 bed (9%).

2.4 Revised drawings are enclosed to illustrate this amendment as per the updated drawing schedule that can be found at Appendix 1 to this Statement.

Alterations to internal layouts in Block G

2.5 A consultation response has been received from LBB housing services in relation to the proposed social rented wheelchair accessible units within Block D. The following specific comments were provided:

- *The LKD for all social housing Block D wheelchair accessible flats fall short of minimum space requirements for M4 3 2(b). The one bed units LKD indicates 23.6 square metres and needs a minimum of 25 square metres. The two bedroom units LKD indicates the same as the one bedroom units (23.6) and require minimum of 29 square metres for 4 persons.*
- *The Kitchen layouts of all of the wheelchair accessible flats – acknowledging the LKD is too small, nevertheless require adjustment- to allow greater*

proximity of the hob to the oven, See Good Practice Guide 8.28 Wheelchair Housing Design Guide Third Edition, 2018 Habinteg Riba Publishing – which indicates minimum requirements and best practice and interpretation of M4 3 2 b wheelchair accessibility.

- *Bathrooms need to indicate only level access showering not baths. The indicated location of shower area for the 2 bedroom flats shows the showering area near the door- which should be avoided to negate any wet floor area from showering near access / egress at door way/ slipping hazards, regardless of 1;40 fall to gully , so would be better located in the corner of room adjacent to the kitchen.*
- *The door of the shower WC room would be better to rehang to the other side allowing ease of access at night from the bedrooms. See Wheelchair Housing Design Guide 3rdEdition 2018 Habinteg interpretation of M4 3 2b Technical Provisions section 10.*

2.6 In response to the above comments, the internal layouts of these units have been amended to ensure the required standards are fully complied with. Revised drawings are enclosed to reflect the amendments as per the updated drawing schedule that can be found at Appendix 1 to this Statement.

Introduction of Triple Glazing

2.7 Comments in relation to the Energy Strategy and Overheating Report have been provided by the GLA which has been reiterated by LBB's energy officer. The GLA response details the following (paragraph 45):

“The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 102.5 kWp of PV. This is welcomed. However, based on the diagram provided, there appears to a large amount of available space for additional PV. As London Plan Policy 5.2 requires that carbon savings should be maximised onsite, prior to offset, the applicant should review the site determine whether there is further opportunity for installation of PV. The carbon savings suggested within this stage of the energy hierarchy are considerably higher than expected. The applicant should explicitly show the calculations used to calculate this value. For the Be Green part of the hierarchy, sample SAP calculation worksheets and BRUKL should be provided to support the savings claimed.”

2.8 To maximise carbon savings onsite and meet the draft new London Plan policy requirements, triple glazing has been introduced across the scheme. An updated

Energy Report, Sustainability Report and Overheating Report have been prepared and submitted with this addendum. These also include SAP calculation worksheets.

Amendments to Churchill Way

- 2.9 Through discussions with LBB highways, proposals have been developed to delineate Churchill Way. This shows the proposed stopping up and public highway which is as existing is used to service the retail units along the High Street adjacent. It has been agreed with officers that the stopping up order will relate to the pavement and parking areas and therefore the vehicle area will remain as public highway and the pavement including the Church parking will be privately managed. Further details including a plan illustrating the stopping up are contained in the Transport Statement Addendum enclosed.

3.0 CONSULTATION RESPONSES

Statutory Consultees

3.1 A number of statutory consultee responses have been received from the following:

- Design comments from LBB planning and external consultant Tibbalds;
- Robert Buckley – LBB Heritage and Urban Design;
- Jillian Newsom – LBB Housing Services;
- Nojan Rastani – LBB Transport / Highways;
- Lee Gullick – LBB Corporate Systems & Sustainability;
- Samir Bougaci – LBB Drainage;
- Steve Glass – LBB Environmental Health;
- Chris Ryder – LBB Trees;
- The Greater London Authority (GLA);
- Schofield Lothian – Bat Survey Review;
- Historic England;
- Historic England Archaeology;
- Advisory Panel for Conservation Areas;
- Transport for London (TfL);
- Thames Water;
- Environment Agency;
- Natural England; and
- Metropolitan Police.

3.2 No in principle objections have been raised by any of these parties. Where appropriate we draw in our further evaluation below from responses in the context of objections received from local residents and other key considerations. This includes issues raised within the GLA Stage 1 Report on which some specific clarifications were sought.

Scale and Massing of the Proposed Development

3.3 Concerns have been raised regarding the bulk, scale and massing of the proposed development in the context of the conservation area and wider town centre.

3.4 It is important to note that within the GLA Stage 1 response, it is commented that:

“The stepped heights arrangement and contrasting palette of facing materials creates a series of distinct massing elements which breaks down the perception of scale and reflects the

proportions of plot widths along the High Street. The submitted TVIA demonstrates the proposal will represent a significant uplift in scale in relation to the established character of the town centre, but the varied heights arrangement successfully mediates in scale between the High Street and Churchill Gardens. ”

- 3.5 Therefore, strategically, the quantum of development proposed is supported by the GLA. However, in response to the concerns raised locally, the maximum building heights have been reduced from 15 to 14 storeys from podium level. As detailed in **Section 2.0**, this results in the omission of 3 flats from Block B. This change is considered to address the concerns raised whilst delivering a quantum of development which responds to the sites location within a designated Opportunity Area and site allocation G in the adopted Town Centre AAP. Indeed given the focus on Opportunity Areas to deliver significant quantum of development such changes to townscape are expected.
- 3.6 It is also of a scale that ensures the scheme is financially viable and therefore deliverable as evidenced by the Viability Assessment that accompanies the planning application and has been independently verified by the Councils own consultants..
- 3.7 As detailed in the Planning Statement submitted with the original submission, the Site is located within Opportunity Site G within the adopted Bromley Town Centre AAP and then the wider emerging Site 10 allocation which is included in the emerging LBB Local Plan. The change to reduce the height of Block B, seek to address concerns raised. The proposals align with the GLA's strategic objectives to direct housing delivery to opportunity areas and town centres of which the site is located. At a local level, the proposed scheme aligns with the aspirations of the Opportunity Site G.
- 3.8 Critically this approach is also wholly consistent with the new National Planning Policy Framework (NPPF 2018) published in July 2018 that post-dates submission of the original planning application.
- 3.9 In particular the NPPF 2018 contains a specific new Chapter 11 entitled 'Making effective use of land'. The underlying objective of this policy is to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. The application site is precisely the sort of site to which this policy is directed at as considered below.
- 3.10 The NPPF 2018 makes clear that in terms of meeting this objective:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places.*

Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*
- c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).” (Paragraphs 122 & 123).*

- 3.11 It is against this important policy context to which “substantial weight” should be given (paragraph 118) when having regard to the overall planning balance as considered further below in Section 4.

Heritage and Impact on Bromley Town Conservation Area Site

- 3.12 Historic England, LBB Conservation Officer, the Advisory Panel for Conservation Areas and Bromley Civic Society have issued consultation responses in regards to the scale and massing of the scheme and impact on the Bromley Town Conservation Area. The key issues raised are considered further below.

Scale and massing, and appearance in townscape views

- 3.13 Concern has been expressed by consultees regarding the scale of the Proposed Development in relation to its surrounding townscape context; specifically, the proposed scale and mass relative to existing development on the High Street, including its appearance in views from the south.
- 3.14 Views 23-25 demonstrate the visual impact of the Proposed Development from the southern end of the pedestrianised High Street and Elmfield Road. The proposals will appear as a marked change in scale and mass relative to the lower-rise buildings fronting the High Street. An assessment of this impact is provided in full within the Heritage, Townscape and Visual Impact Assessment (HTVIA) submitted with the application.
- 3.15 The overall impact must be considered within the context of transformational change envisaged for Bromley town centre. Intensification is not just anticipated, but desirable as already identified above. The expectation is one of contrast between the existing lower-rise development and the taller high density development. The question is whether design has mitigated that impact.
- 3.16 The proposals have evolved through an iterative design process which has included pre-application engagement with consultees, taking into account the impact of the proposals on local character. The team presented the emerging proposals to a CABE design review panel in October 2017, who were supportive in principle of the proposed scale, due to the handling of the massing and mindful of the highly sustainable site location. The GLA further supported this position.
- 3.17 The overall perceived mass of the Proposed Development is broken down by the variation in height, form and elevation treatment. The tallest elements have been located towards the centre of the development. Regard has been given to the local landmark Churchill Theatre, which will remain distinct and separated from the Proposed Development by an area of open sky.

- 3.18 The buildings have been designed to read as a series of massing elements with a vertical emphasis derived through their architectural appearance. The proposed brick material palette is complementary to the High Street and the detailing, including diagonal brickwork, picks up on the Victorian architecture.
- 3.19 The Proposed Development generally incorporates inset balconies that allow a clear expression of architectural form. Projecting balconies are used sporadically to provide a greater sense of depth and articulation to the massing. The architectural appearance of each block is also emphasised by the use of white, grey, blue and red brick.

Relationship with Bromley Town Conservation Area

- 3.20 Consultees have also expressed concern in relation to the impact of the Proposed Development to the character and appearance of the Bromley Town Centre Conservation Area. The impacts are, to an extent, coterminous with the townscape impacts outlined above. Notwithstanding, we discuss overall impact below, mindful of the specific policy approach towards assessment as set out in detail in the HTVIA that accompanies the planning application.
- 3.21 The development as a whole must be considered, including the existing Site condition, which includes a back-of-house service area that is a detracting feature to the setting of the CA.
- 3.22 The Proposed Development would largely improve some aspects of the character and appearance of the area, and demonstrably improve its function. To the north of the Site, a new high quality hard and soft landscaped area will be designed, incorporating the proposed Theatre Plaza and Library Gardens. The landscaping for the area has been developed to respond to the character of the existing environment, including the use of grey materials and hard landscaping in the environs of the Churchill Theatre.
- 3.23 Library Gardens is to be retained as part of the proposals, and improved with a new scheme of soft landscaping, enabling the area's continued function as a public open space.
- 3.24 Library Gardens will extend the existing open space at Church House Gardens, with active ground floor uses to blocks A, F and G creating interest and pedestrian activity.
- 3.25 The design responds to the character and materials of the Conservation Area by using a range of 'gable' type detailing to create an attractive, varied backdrop to Library Gardens. At ground floor, the buildings provide active frontages, creating interest at

street level. The elevations are varied and modulated to provide relief at upper levels, and the Proposed Development has been stepped back from sixth floor level, reducing mansions and referring to blocks of mansion flats, which are already an element of the surrounding townscape.

3.26 Bromley Town Centre Conservation Area is already experienced within a wider urban context which includes taller development, specifically, the Regents Gardens development, and St Mark's Square to the south. It is acknowledged that the scale of the Proposed Development would cause some harm to the CA, which would be 'less than substantial' in the terms of the NPPF as confirmed by both Historic England and the Councils own Conservation Officer. The juxtaposition of tall buildings with lower rise areas in the Opportunity Area is nonetheless inevitable. This is not only acceptable and appropriate, but also necessary to deliver the regeneration benefits set out in the development plan and NPPF 2018.

3.27 In the context of an identified allocated site, and the provision of much needed housing, the extent of impact should therefore clearly be considered acceptable on balance. It would not give rise to any unacceptable impacts to the existing context of development in the town centre and will form part of its wider regeneration, in accordance with the aspirations of the development plan.

Design alterations to Block B

3.28 The findings of the HTVIA remain extant. Notwithstanding, the magnitude of effect previously identified has been reduced as a result of the reduced scale of the tallest building to 14 storeys. In particular, the revisions will have a noticeable reduction in the visual impact to long views from the west. The composition of the proposed development would remain balanced, with a varied and articulated roofscape.

Design

3.29 Comments in relation to design have been received from the GLA and LBB (including input from external design advice). The key issues raised are as follows:

- The level of active frontage and surveillance onto Churchill Way and the functionality of this route for both pedestrians and vehicles;
- The nature of the east-west link from the High Street to Churchill way and the promenade under Block E;
- Aspect of apartments facing east over Churchill Way;
- Clarification regarding the levels at the western perimeter of the site and the nature of the service and escape route along Blocks A, B and C; and

- The extent of level access across the scheme, in particular to Block D.
- 3.30 A Design and Access Statement Addendum, prepared by Stitch, is enclosed with this submission. This provides further clarification alongside additional views and diagrams to address the above issues.
- 3.31 The document demonstrates that Churchill Way will be activated at ground floor level and from the residential units above. The design of this space and overlooking from the upper floor residential units means that there will be good natural surveillance. The approach and design has been presented to the Designing out Crime officers at the Metropolitan Police. Feedback on the functionality and security of this part of the scheme has been positive and a significant improvement on the existing condition.
- 3.32 Views are included in the Addendum to illustrate the pedestrian experience from the High Street through the east-west link into Churchill Way and then the promenade under Block E. It is highlighted that this part of the scheme provides opportunity for public art which could further enhance activity and use of this route into the Site. It is clarified that apartments within Blocks E and F will have views over the High Street and the proposed scheme seeks for all homes to overlook either gardens / public realm or the town centre.
- 3.33 Diagrams of the Block A western boundary are included in the Addendum to illustrate the levels along this perimeter.
- 3.34 It is therefore considered that the detailed design comments and clarifications have been addressed within the Design and Access Addendum and the revised drawings submitted.

Daylight and Sunlight

- 3.35 Comments have been received from LBB and the GLA in relation to the Daylight and Sunlight Assessment submitted with the application. These comments are predominately clarifications of which a response is provided to each in the Daylight and Sunlight Assessment Addendum, prepared by GL Hearn.
- 3.36 This addendum also considers the omission of one storey from Block B, the wheelchair unit layout amendments and the introduction of triple glazing. The omission of the 15th storey from Block B does not materially change the conclusions of the original Daylight and Sunlight Analysis. However, the reduction in height will result in slightly less overshadowing to Church House Gardens and the promenade. Moreover, there will be

a slight increase in the amount of daylight and sunlight received to many of the units in Blocks D, E, and F. The report concludes that the layout amendments will not materially change the amount of daylight and sunlight received to these units. Furthermore, the triple glazing will have a minor effect on the light received within the proposed units.

- 3.37 Overall therefore the scheme amendments would not alter the conclusions outlined in the original Daylight and Sunlight Report that demonstrates the scheme is acceptable in daylight/sunlight terms.

Residential Design and Accessibility

- 3.38 A response regarding housing standards and accessibility was provided by LBB Housing Services. Extensive comments were included on the proposed wheelchair apartments in terms of layouts as well as clarifications. As detailed above, the scheme has been revised to take account of the requested layout amendments. It is considered that the revised plans positively addresses all of the comments received in this regard.

Energy

- 3.39 A consultation response has been issued by LBB Corporate Systems & Sustainability Team as well as comments on the energy strategy from the GLA. Concerns were raised with the low 'Be Lean (Energy Efficiency)' saving and a request was made for the proposals to meet the new Draft London Plan requirement for a 10% saving from energy efficiency measures. As outlined above, the scheme has been amended to incorporate triple glazing throughout the residential units.
- 3.40 The measures detailed previously alongside the inclusion of triple glazing results in a reduction of carbon dioxide emissions of 41% over Building Regulations 2013 with 12% achieved through low or zero carbon technology on site. A carbon offset payment of £578,952 is proposed to mitigate where zero carbon cannot be met on site. Further details are contained in the updated Energy, Sustainability and Overheating Reports.

Transport and Highways

- 3.41 Consultation responses from TfL and LBB Highways have been received. The comments are summarised as follows:

TfL

- It is acknowledged that there is unlikely to any unacceptable residual impacts on the strategic transport network;

- There is a suggestion for the proposals to be car free bar disabled provision given the Site's town centre Opportunity Area location with the highest PTAL;
- The residential disabled car parking provision meet the draft new London Plan standards. However, it should be demonstrated how the remaining bays (to a total of one per dwelling per 10% of dwellings) can be provided in the future, should demand arise;
- Request for 20% of car parking spaces to have active Electric Vehicle Charging Points (EVCP) with the remaining spaces having passive provision to be conditioned;
- To comply with the draft new London Plan, a minimum of two disabled spaces should be provided for the Church uses, with the remaining spaces provided for operational purposes only;
- The inclusion of two car club spaces is welcomed. It is requested that at least two years free car club membership for all residents should be secured through the S106 agreement. Residents should be prohibited from applying for car parking permits in the surrounding Controlled Parking Zone (CPZ), again secured in the S106 agreement;
- The proposed cycle parking provision exceeds the current London Plan standards and broadly accords with draft new London Plan standards which is welcomed. The applicant should seek to provide more long-stay spaces; and
- The proposed pedestrian links from Bromley High Street through the Site to Library Gardens are supported. A contribution of £25,000 towards legible London signage is requested.

3.42 In response to the feedback received, a Transport Statement Addendum has been prepared by Mayer Brown and is included with this submission. In response, to the comments from TfL, it is confirmed that the applicant accepts the request for a contribution towards legible London signage. Public realm and the landscaped spaces are a fundamental element of the proposals. With that said, it is not possible to accommodate additional cycle parking spaces from that currently proposed. On balance, the quantum and type is considered appropriate for the scheme. The configuration of the basement and spaces proposed also does not allow for non-compliant parking spaces to be converted. Again, the provision of disabled car parking spaces is considered acceptable.

3.43 With regards to the car parking provision for the church, this is based on specific requirements and in consultation with LBB highways, the provision of one disabled space is considered acceptable.

LBB

- Is it not considered that there will be any significant impacts on the surrounding road network;
- The number of car parking spaces is not sufficient;
- The cycle parking provision is acceptable; and
- The Council will not permit private on-street parking. The applicant should consider to stop up Churchill way or provide parking within the Site's curtilage for the church and servicing.

3.44 The Transport Statement Addendum reiterates that the Site's highly accessible location within Bromley town centre (PTAL 6) means residents and visitors can utilise sustainable transport modes. A package of measures including two car club spaces, car club provision, two year car club membership and prohibiting residents from obtaining a local parking permit mitigate the level of car parking provision. In consideration of the planning benefits including significant public realm and landscaping, the car parking provision is considered appropriate for the development.

3.45 In response to the comments regarding private on-street parking, a proposed stopping up plan has been prepared in consultation with LBB highways and is included in the Transport Statement Addendum.

Surface Water Strategy / Drainage

3.46 Comments in regards to drainage and the surface water strategy have been received from LBB and the GLA. Brand Consulting Engineers have reviewed and provided the response below:

Insufficient Design Information

The proposed flood risk assessment and drainage proposals confirm that the Environment Agency designated Low Risk Flood Zone 01 site (chapter 4.8), is not at risk of flooding from the parameters designated by the EA, and reviewed in within Chapter 8. The proposed development will also further enhance the flood management through the development by targeting a greenfield discharge rate from the development, which is a significant betterment on the network, to that of the existing uncontrolled system (Refer to Chapter 9 Surface Water Management for this assessment and appraisal against the London Plan – Chapter 9.6). The suitability of the development has also been tested through the flood risk assessment via the sequential and exception testing in accordance with NPPF (section 6).

Surface Water Drainage Strategy

The proposed private system within the development is appraised for SUDs suitability and application within Chapter 9 of the FRA, including SUDS Appraisal in accordance with CIRIA C753, which includes the assessment and viability of all soakaway systems.

Detailing of SUDs Measures

SUDs design proposals have been provided with Appendix Ga & Gb, with proprietary product calculations from manufacture Polypipe in Appendix F, all of which confirm that a greenfield runoff rate can be achieved. To confirm any specific concerns the following schedule outlines key design parameters discussed within the FRA:

	<i>Refer to...</i>
Run-off rate and volume control	Appendix F – Polypipe, Sustainable Drainage Statement, Section 06 Calculations – Through Stormflow analysis, calculations has been provided, which includes catchment details, rainfall detailing, storage details, outflow details and resulting, which include critical storm identification, critical rainfall rates, halftimes and required volume, with supporting time entry profile curves. This data has been integrated into the engineering design has been presented within the FRA and engineering layouts, - APPENDIX Ga, & Gb.
Attenuation sizing	The attenuation requirements for the development are calculated in Appendix F and presented within the development within Appendix Ga & Gb.
Run-off treatment	Refer to FRA Chapter 9, section 9.7 SUDS Appraisal of options, where the application of options in accordance with CIRIA C753 and Engineering Proposals in Appendix Ga & Gb, (drainage details including filtration systems with membrane protection) and Appendix F – Polypipe, Sustainable Drainage Statement, Section 3 drainage proposals.
Design for exceedance	Refer to FRA Chapter 12, Residual Risks – Design Exceedance.
long term management	Refer to Appendix F – Polypipe, Sustainable Drainage Statement, Section 06 Maintenance & FRA Chapter 12, the management to residual risks through maintenance.
Quick estimate calculations	Appendix F – Polypipe, Sustainable Drainage Statement, Section 06 Calculations – Through Stormflow analysis, calculations has been provided, which includes catchment details, rainfall detailing, storage details, outflow details and resulting, which include critical storm identification, critical rainfall rates, halftimes and required volume, with supporting time entry profile curves.
Engineering Layout Plan	Engineering Proposals are referenced and presented in Appendix Ga & Gb.

3.47 In the light of the above responses, it is considered that the comments in relation to surface water drainage are addressed.

Ecology

3.48 A Preliminary Ecological Appraisal and Bat Activity Report were submitted with the application. Schofield Lothian were instructed by LBB to review the reports. It was concluded that the reports were adequate for the application and the recommendations within them should be adhered to. Whilst no clarifications are required, it is highlighted that certain sections could benefit from further details. In the light of these comments, Richard Graves Associates have provided the responses below:

- *SL Comment: Section 3 3.4 No mention of species of principal importance which includes soprano pipistrelle, noctule etc. The survey was not surveying for a specific species of principal importance therefore this is not considered to affect the report. This section is considered sufficient.*

RG Response: It is not usual practice to refer to any bat species listed as species of principal importance (which the LPA has a duty to consider) as they and all bat species are fully protected by other legislation. LPAs have always been directed to regard protected species as a material consideration and must consider European Protected Species (all bats).

- *SL Comment: Section 4.5 Recognition of the difficulty in distinguishing Myotis bats to the species level from call analysis should also be noted. Further detail would be useful here, however it would not affect the outcome of the report.*

RG Response: Difficulty in distinguishing Myotis sp. calls is noted, although Daubenton's was determined, with the aid of our visual observations over the lake of typical hunting behaviour unlike any other UK native species (Ref: Dietz, C. von Helverson, O. & Nill Bats of Britain, Europe and Northwest Africa 2009), as per our detector limitations section.

- *SL Comment: Section 4.5 Use of Elekon Batscanner Stereo – calls cannot be recorded from this device which should be noted. Further details would be useful here, however it would not affect the outcome of the report.*

RG Response: The Elekon Bat Scanner was not used to record calls, or separately from a time expansion detector. We use this as a backup as it is the most rain resistant detector we know. The stereo function also assists with visual tracking of the bats. The desktop study results are referenced in section 2.4 (pages 8 – 9). Of these records brown long-eared, noctule and Daubenton's are considered as historic (more than 5 years old). The common and soprano pipistrelle records (from 2013) are from a distance of 1.5 km. Records are of this type are typical of almost any data search carried out in

Greater London and therefore do not add to our interpretation. Our activity survey recorded all of the desktop species and additional species.

- *SL Comment: Section 6 A time limit should be given indicating how long the particular ecological data should be relied on for decision-making purposes without the need to be updated e.g. for EPS licences 18-24 months. Further detail would be useful. The rest of the interpretation is clear and provides meaning and implications. The recommendations are also appropriate in line with the results.*

RG Response: This comment is noted. The advice on this from Natural England may vary, depending on who provides it. We are due for some changes in licencing shortly. NE also require the ecologist to confirm they have visited the site no more than 3 months before. There will be a need to undertake internal inspections when access is available, with other surveys dependant on the timing / seasonality of the development programme.

Land Ownership

- 3.49 Within the GLA Stage 1 response, clarification is requested on the existing residential properties as well as land ownership across the Site. A land ownership plan (see Drawing PL-009) has been prepared to show the existing ownership across the Site. This illustrates that four existing properties at Ethelbert Close are within LBB's ownership. These properties are currently let on a temporary basis and are not provided as affordable homes controlled through any legal agreement. The remainder of the properties are privately owned of which the specific details are included in the Certificate B ownership schedule originally submitted with the planning application forms. None of the properties are within the affordable housing tenure and therefore there is not a requirement to replace on a like for like basis. Currently none of the existing properties are vacant.
- 3.50 Drawing PL-009 shows that when highways land and the area of Library Gardens which will remain as gardens is excluded, the land ownership split is 82% private and 18% public.
- 3.51 On this basis and applying the GLA's Affordable Housing criteria this would give rise to an affordable housing requirement of 154 units based on the 82:18 private public split. The proposed scheme delivers 142 units whilst this is lower than the policy compliant level it has been justified as the maximum affordable amount that the scheme can provide through the Viability Assessment.

Proposed Conditions

3.52 The following consultees have recommended specific planning conditions to be attached to the planning permission should consent be granted:

- Samir Bougaci – LBB Drainage;
- Steve Glass – LBB Environmental Health;
- Chris Ryder – LBB Trees;
- Historic England Archaeology;
- Thames Water;
- Environment Agency;
- Natural England; and
- Metropolitan Police.

3.53 The recommended conditions have been reviewed and these are all considered acceptable by the applicant.

4.0 PLANNING BALANCE & CONCLUSIONS

4.1 This section of the Planning Statement Addendum provides a planning balance assessment as required under the policies and section 38(6) of the 2004 Act.

4.2 Having regard to the assessment undertaken within the original Planning Statement and this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:

- Has evolved through extensive discussions with officers at LBB, the GLA and Design Council CABE prior to submission and during the determination process;
- Optimises a previously developed site in a highly sustainable town centre location (PTAL6) with a mixed use scheme consistent with planning policy in the statutory Development Plan and NPPF 2018
- The mix of uses positively align with the GLA and LBB objectives for Bromley Town Centre Opportunity Area and its Metropolitan Centre status as well as those of the adopted site allocation;
- Re-provides commercial floorspace which will enhance the viability and vitality of the town centre;
- Re-provides an increased quantum of community floorspace from that as existing on site;
- Provides new business floorspace which will meet the needs of small, new start-up and creative businesses, seeking a town centre location;
- Delivers high quality residential accommodation with a quantum which is both a strategic and local priority and will make a significant contribution towards LBBs strategic housing target;
- Provides a mix of residential units which addresses an identified need;
- Includes 142 on-site affordable housing units;
- Delivers high quality public realm including dedicated play space;
- Results in a net gain of Urban Open Space;
- Delivers a high quality design which responds to the character of the surrounding area whilst respecting Bromley Town Conservation Area;
- Provides a quantum of development in terms of bulk, scale and massing that respects the surrounding area and is consistent with similar built relationships found elsewhere in the town centre; and
- Is in accordance with relevant planning policy at the national, regional and local level and delivers sustainable development.

- 4.3 In undertaking the proper planning balance judgement it is acknowledged that there is some harm arising from the scheme (albeit less than substantial harm) on the adjoining conservation area. However, the above benefits arising from the scheme significantly and demonstrably outweigh the benefits, when assessed against the statutory development plan and policies in the NPPF 2018 taken as whole.
- 4.4 On this basis therefore planning permission should be granted.

APPENDIX 1
UPDATED DRAWING SCHEDULE – CG-2 REV A

DRAWING NO.	DRAWING TITLE	SCALE	11 MAY & 8 JUN REV	17 DEC
EXISTING SITE				
PL-001	LOCATION PLAN / REDLINE BOUNDARY	1:1250 @ A3	-	-
PL-002	EXISTING SITE PLAN	1:500 @ A3	-	-
PL-004	EXISTING SITE ELEVATIONS AA & BB	1:500 @ A3	-	-
PL-005	EXISTING SITE ELEVATIONS CC & DD	1:500 @ A3	-	-
PL-006	EXISTING SITE SECTION EE	1:500 @ A3	-	-
PL-007	DEMOLITION PLAN	1:250 @ A1	-	-
PL-008	LOCATION PLAN	1:1250 @ A1	-	-
PL-009	EXISTING SITE – LAND OWNERSHIP	1:500 @A3	-	-
STRATEGY PLANS				
PL-024	LANDSWAP URBAN OPEN SPACE	1:1000 @ A3	-	-
BLOCK PLANS				
PL-050	SITE PLAN	1:500 @ A3	-	A
PL-051	ROOF PLAN	1:500 @ A3	-	B
BLOCK ABC FLOOR PLANS				
PL-ABC-120	BLOCK ABC - BASEMENT LEVEL G-2	1:250 @ A3	-	A
PL-ABC-121	BLOCK ABC - BASEMENT LEVEL G-1	1:250 @ A3	-	A
PL-ABC-122	BLOCK ABC - GROUND FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-123	BLOCK ABC - 1ST FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-124	BLOCK ABC - 2ND-5TH FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-125	BLOCK ABC - 6TH FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-126	BLOCK ABC - 7TH FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-127	BLOCK ABC - 8TH FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-128	BLOCK ABC - 9TH FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-129	BLOCK ABC - 10TH FOOR PLAN	1:250 @ A3	-	A
PL-ABC-130	BLOCK ABC - 11TH-12TH FLOOR PLAN	1:250 @ A3	-	-
PL-ABC-131	BLOCK ABC - 13TH-14TH FLOOR PLAN	1:250 @ A3	-	A
PL-ABC-132	BLOCK ABC - ROOF PLAN	1:250 @ A3	-	-
BLOCK DEF FLOOR PLANS				
PL-DEF-135	BLOCK DEF - BASEMENT LEVEL G-2	1:250 @ A3	-	A
PL-DEF-136	BLOCK DEF - BASEMENT LEVEL G-1	1:250 @ A3	-	A
PL-DEF-137	BLOCK DEF - GROUND FLOOR PLAN	1:250 @ A3	-	B
PL-DEF-138	BLOCK DEF - 1ST FLOOR PLAN	1:250 @ A3	-	A
PL-DEF-139	BLOCK DEF - 2ND-5TH FLOOR PLAN	1:250 @ A3	-	A
PL-DEF-140	BLOCK DEF - 6TH FLOOR PLAN	1:250 @ A3	-	A
PL-DEF-141	BLOCK DEF - 7TH-9TH FLOOR PLAN	1:250 @ A3	-	A
PL-DEF-142	BLOCK DEF - 10TH FOOR PLAN	1:250 @ A3	-	A
PL-DEF-143	BLOCK DEF - 11TH FLOOR PLAN	1:250 @ A3	-	-
PL-DEF-144	BLOCK DEF - 12TH-13TH FLOOR PLAN	1:250 @ A3	-	-
PL-DEF-145	BLOCK DEF - ROOF PLAN	1:250 @ A3	-	-
BLOCK G FLOOR PLANS				
PL-G-150	BLOCK G: GROUND FLOOR PLAN	1:250 @ A3	-	-
PL-G-151	BLOCK G: 1ST FLOOR PLAN	1:250 @ A3	-	-
PL-G-152	BLOCK G: 2ND-3RD FLOOR PLAN	1:250 @ A3	-	A
PL-G-153	BLOCK G: 4TH-5TH FLOOR PLAN	1:250 @ A3	-	-
PL-G-154	BLOCK G: 6TH FLOOR PLAN	1:250 @ A3	-	-
PL-G-155	BLOCK G: ROOF PLAN	1:250 @ A3	-	-
CAR PARKING LAYOUTS				
PL-G-156	BASEMENT CAR PARKING LAYOUT	1:500 @ A3	-	A
PL-G-158	SITE CAR PARKING LAYOUT	1:500 @ A3	-	A
WHEELCHAIR UNITS				

PL-170	WHEELCHAIR UNIT - INTERNAL LAYOUT - BLOCK A: 2B3P	1:50 @ A3	-	A
PL-171	WHEELCHAIR UNIT - INTERNAL LAYOUT - BLOCK D: 1B2P	1:50 @ A3	-	A
PL-172	WHEELCHAIR UNIT - INTERNAL LAYOUT - BLOCK D: 2B4P	1:50 @ A3	-	A
PL-173	WHEELCHAIR UNIT - INTERNAL LAYOUT - BLOCK E: 2B3P	1:50 @ A3	-	A
PL-174	WHEELCHAIR UNIT - INTERNAL LAYOUT - BLOCK F: 2B3P (1)	1:50 @ A3	-	A
PL-175	WHEELCHAIR UNIT - INTERNAL LAYOUT - BLOCK F: 2B3P (2)	1:50 @ A3	-	A
ELEVATIONS				
PL-190	SITE ELEVATION AA	1:500 @ A3	-	A
PL-191	SITE ELEVATION BB	1:500 @ A3	A	C
PL-192	SITE ELEVATION CC	1:500 @ A3	-	A
PL-193	SITE ELEVATION DD	1:500 @ A3	-	A
PL-194	SITE SECTION EE	1:500 @ A3	-	A
PL-200	BLOCK AFG NORTH ELEVATION	1:250 @ A3	A	B
PL-201	BLOCK ABC EAST ELEVATION	1:250 @ A3	A	B
PL-202	BLOCK ABC WEST ELEVATION	1:250 @ A3	A	B
PL-203	BLOCK CD SOUTH ELEVATION	1:250 @ A3	A	B
PL-204	BLOCK DEF EAST ELEVATION	1:250 @ A3	A	B
PL-205	BLOCK DEF WEST ELEVATION	1:250 @ A3	A	B
PL-206	BLOCK G WEST ELEVATION & SOUTH	1:250 @ A3	A	B
PL-207	BLOCK G SOUTH & EAST ELEVATIONS	1:250 @ A3	A	B
PL-208	BLOCK G NORTH ELEVATION	1:250 @ A3	A	-
SECTIONS				
PL-300	SECTION AA	1:250 @ A3	A	B
PL-301	SECTION BB	1:250 @ A3	A	B
PL-302	SECTION CC	1:250 @ A3	A	B
PL-303	SECTION DD	1:250 @ A3	A	-
PL-305	SECTION FF	1:250 @ A3	A	-
DETAILS				
PL-400	BLOCK F NORTH ELEVATION - COMMERCIAL GROUND FLOOR FAÇADE & RECESSED BALCONY DETAIL	1:50 @ A3	A	-
PL-401	BLOCK F NORTH ELEVATION - RECESSED BALCONY AND TERRACE PARAPET DETAIL	1:50 @ A3	A	-
PL-402	BLOCK E EAST ELEVATION - PROJECTING BALCONY AND ROOF PARAPET DETAIL	1:50 @ A3	A	-
PL-403	BLOCK A WEST ELEVATION - HALF PROJECTING BALCONY AND ROOF PARAPET DETAIL	1:50 @ A3	A	-
MECHANICAL SCHEMATICS				
SCH-56-01	HEATING SCHEMATIC SHEET 1 OF 7-	NTS @ A1	-	D2
SCH-56-02	HEATING SCHEMATIC SHEET 2 OF 7-	NTS @ A1	-	D2
SCH-56-03	HEATING SCHEMATIC SHEET 3 OF 7-	NTS @ A1	-	D2
SCH-56-04	HEATING SCHEMATIC SHEET 4 OF 7-	NTS @ A1	-	D2

SCH-56-05	HEATING SCHEMATIC SHEET 5 OF 7 –	NTS @ A1	-	D2
SCH-56-06	HEATING SCHEMATIC SHEET 6 OF 7 -	NTS @ A1	-	D2
SCH-56-07	HEATING SCHEMATIC SHEET 7 OF 7-	NTS @ A1	-	D2
MECHANICAL SCHEMATICS – DETAILS				
PLT-EC-01	ENERGY CENTRE	1:50 @ A1	-	D2
MECHANICAL SCHEMATICS – LAYOUTS				
80-00	ROOF PV LAYOUT	1:200 @ A1	-	-
CONSERVATION AREA – EXISTING AND PROPOSED				
PL-025	CONSERVATION AREA – EXISTING AND PROPOSED	1:200 @ A1	-	A
LANDSCAPE DRAWINGS				
LD-PLN-120	COLOUR LANDSCAPE MASTERPLAN –	1:250 @ A0	-	-
LD-PLN-100	LANDSCAPE PLAN – REV P4	1:250 @ A1	-	-
LD-SEC-011 REV C	WESTERN PERIMETER SECTIONS	1:200 @ A2	-	-

