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50 Ashgrove Road, Bromley, BR1 4JW

Planning Statement

Northstar 2000 Ltd

28th March 2017

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Contents

1.0 Introduction 1

2.0 Site and Surrounding Area 3

3.0 Relevant Planning History 5

4.0 Pre-application Discussions 7

5.0 Proposed Development..... 9

6.0 Planning Policy..... 11

7.0 Planning Considerations 18

8.0 Conclusion 26

Appendices

Appendix 1 Site Location Plan

Appendix 2 Pre-application Response

1.0 Introduction

- 1.1 This Statement is submitted in support of a full planning application on behalf of the Applicant, Northstar 2000 Ltd., for the demolition of the existing office building and redevelopment of the Site to provide four new dwellings comprising two semi-detached houses and two flats at 50 Ashgrove Road, BR1 4JW. A Site Location Plan is included at **Appendix 1**.
- 1.2 The proposed description of development is as follows:
- Full planning permission for the demolition of the existing office building and construction of 4 new dwellings with associated vehicle and cycle parking, recycling and refuse facilities.*
- 1.3 The Site is located in the Downham ward of the London Borough of Lewisham (LB Lewisham).
- 1.4 The Site currently contains a single-storey building, which was previously in use as a Class B1 office. However, the building has now been vacant for the last six months. The total floor area of the building is approximately 180m².
- 1.5 The remainder of the Site was previously in use as a scaffolders yard (Class B8 use). However, the operation of the yard for this use ceased two-and-a-half years ago, and the yard has not been in commercial use since then.
- 1.6 The existing office building and scaffolders yard, which are in a poor and deteriorating condition, have now been marketed unsuccessfully for 27 months (December 2014 – March 2017). The lack of interest shown in the property is largely a result of the poor access arrangements and the close proximity of residential properties. The poor state of the building and the prohibitive costs of refurbishment have also contributed to a lack of interest from applicants.
- 1.7 As the Site lies within a predominantly residential area, we consider the redevelopment of the Site for residential use to be appropriate in this location.
- 1.8 The development proposed as part of this application seeks the demolition of an underutilised office building in a predominantly residential location to provide 2 x 4-bedroom houses and 2 x 2-bedroom flats, which will contribute towards meeting the Borough's housing needs. The proposed scheme also aims to improve the appearance of the Site by providing a high-quality development which is reflective of the character and setting of the surrounding area.
- 1.9 This scheme has been developed following extensive pre-application discussions with Planning Officers from LB Lewisham in October 2016.

Submission Documents

- 1.10 This Planning Statement should be read in conjunction with the following reports, submitted as part of the application:

REPORT TITLE	AUTHOR
Arboricultural Report	Sylvanarb
Archaeological Assessment	AOC Archaeology Group
Conditions Survey, incl. Asbestos Report	Court Buckingham Ltd.
Design & Access Statement	March Design Associates
Land Contamination Assessment	Terragen Environmental Consultants Ltd.

Marketing Report	KALMARs Commercial
Sustainability Statement	SRS Partnership
Transport Statement	ADL Transportation Ltd.

1.11 This application is also supported by the following drawings, prepared by March Design Associates:

DRAWING NO.	DESCRIPTION
	Site Location Plan
1629/01	Existing Site Survey
EX.01	Existing Plans, Sections, and Elevations
P.51	Proposed Site Plan and Cross Sections
P.52	Proposed Site Lighting Drainage Block Plan and Materials
P.53	Proposed Houses PSE
P.54	Proposed Maisonette Flats PSE
1629_01	Existing Site Survey

Structure of Planning Statement

1.12 This Statement is set out in the following sections:

- Section 2 describes the Site within the immediate local context;
- Section 3 identifies the relevant planning history of the site;
- Section 4 sets out the proposed development in greater detail;
- Section 5 identifies the relevant national, regional, and local policy context;
- Section 6 addresses the material planning considerations of the proposal; and
- Section 7 draws together the conclusions of this Statement.

1.13 The appendices referred to in the text are included at the end of this Statement.

2.0 Site and Surrounding Area

- 2.1 The Site is located in the Downham ward near the southern boundary of LB Lewisham where it meets the outer London Borough of Bromley. The Site is considered to be in an 'Suburban Setting'.
- 2.2 The location and extent of the Site (approximately 0.12ha) are set out in **Figure 1** below:



Figure 1. Aerial map highlighting the boundary of the Site at 50 Ashgrove Road.

- 2.3 The Site currently comprises a single-storey office building and a former scaffolders yard. The office building has been vacant for the past six months, and the scaffolders yard has not been in commercial use for two-and-a-half years, though its lawful use is still considered to be Class B8 (Storage and Distribution). Both the office building and the scaffolders yard are in a state of disrepair, which is discussed in further detail in the accompanying Conditions Survey prepared by Court Buckingham Ltd.
- 2.4 The Site is bounded to the north by the rear garden of the nearby house at No. 46 Ashgrove Road. The pattern of long and narrow rear gardens continues in this direction along the length of Ashgrove Road.
- 2.5 To the east of the Site is the rear garden associated with No. 48 Ashgrove Road. Further east is Ashgrove Road itself, beyond which lies residential development mostly comprising 2-storey semi-detached and terraced housing.
- 2.6 To the south the Site is bounded by The Ashgrove Estate, which comprises two main warehouses with a number of units in business and industrial use. Further south is the Millwall Football Club Training Ground, which is designated as an Urban Green Space, an area of Metropolitan Open Land (MOL), and as part of the Borough's Green Chain network. The northern part of the Training Ground is also identified as a Site of Importance for Nature Conservation (SINC).
- 2.7 The Site is bounded to the west by the Ten-Em-Bee Sports Development Centre and playing fields, which is also designated as an area of MOL and part of the Green Chain network.

- 2.8 The Site has a Public Transport Accessibility Level (PTAL) score of 1b (Very Poor). 50 Ashgrove Road is served by two nearby bus stops (Routes 208 Lewisham Station-Orpington/Perry Hall Road; and 320 Biggin Hill Valley-Catford Bridge Station), both of which are within a 5-minute walk of the Site.
- 2.9 The Site is accessed via a private road at a width of approximately 4.5m, located between Nos. 48 and 52 Ashgrove Road. No vehicle parking is currently provided on-site, and the Site is not within a Controlled Parking Zone (CPZ).
- 2.10 The Site does not contain any statutorily or locally listed buildings and is not located within a Conservation Area, however it is within an Area of Archaeological Priority.
- 2.11 The Site is located within Flood Zone 1, which is the area at lowest risk of flooding from sea and river sources.
- 2.12 With regards to local amenities, Downham (District) Town Centre lies approximately 600m to the north of the site, and contains a mix of retail frontage (Class A1 use) and restaurants and cafes (Class A3 use). A smaller area of retail frontage lies to the northern end of Ashgrove Road, approximately 250m from the Site.
- 2.13 In terms of public open spaces, Beckenham Place Park lies approximately 15m to the west and includes both the Common and Summerhouse playing fields. This park has a number of publicly-accessible pathways and contains part of the Ravensbourne River, an 18-hole golf course, and large wooded area.

3.0 Relevant Planning History

- 3.1 An outline application (LPA Ref. DC/05/58796/FT) was registered by the Council on 20th January 2005 but later withdrawn by the applicant on 17th May 2005 for the following description of development:

The demolition of the existing building on the site of 50 Ashgrove Road, Bromley, Kent and the construction of 1 x 2-bedroom and 4 x 3-bedroom houses, the provision of parking for 9 cars, together with a bin collection point on amenity land to the side of 52 Ashgrove Road.

- 3.2 A subsequent application for full planning permission (LPA Ref. DC/08/70221/X) was refused on 15th January 2009 for the following description of development:

The demolition of the existing building at 50 Ashgrove Road, Bromley, Kent and the construction of 1 x 2-bedroom and 6 x 3-bedroom, two-storey, plus roof space, houses with work space on the ground floors, together with associated landscaping and the provision of refuse stores and 10 car parking spaces.

- 3.3 The following reasons of refusal were given by the Council:

1. *The proposal is considered to represent an over-development of the backland site, with the unacceptable loss of a section of existing garden to the rear of no. 46 Ashgrove Road, together with the encroachment of a further layer of employment related development upon the residential setting, impacting detrimentally upon the amenities of neighboring occupiers and the character of the surrounding area, contrary to Policy HSG 8 Backland and In-fill Development in the adopted Unitary Development Plan (July 2004).*
2. *The scale of development proposed and the resulting level of activity, the narrow width of the proposed access onto the site, inadequate pedestrian footways and the potential conflict between vehicle maneuvering and pedestrian routes would be likely to cause additional parking pressures on Ashgrove Road, detrimental to the amenities of neighboring occupiers and would create conditions prejudicial to the safety of pedestrians and other visitors to the site, contrary to policies HSG 8 Backland and In-fill Development and TRN 17 Protecting Cyclists and Pedestrians of the Council's adopted Unitary Development Plan (2004).*
3. *The proposed siting and three-storey height of units 1 & 7 would appear overbearing and discordant, positioned within close proximity of the existing dwellings at nos. 44, 46 & 48 Ashgrove Road, resulting in an increased sense of enclosure, whilst the upper floors of both units would be likely to overlook the neighboring garden areas, contrary to Policies URB 3 Urban Design, HSG 4 Residential Amenity, HSG 5 Layout and Design of New Residential Development and HSG 8 Backland and In-fill Development in the adopted Unitary Development Plan (July 2004).*
4. *The proposed roof terraces to units 6 & 7, by reason of their elevated position and relationship to adjoining houses and gardens, would result in overlooking and loss of privacy to residents at 46 & 48 Ashgrove Road, contrary to Policies URB 3 Urban Design, HSG 4 Residential Amenity and HSG 8 Backland and Infill Development of the adopted Unitary Development Plan (July 2004).*

5. *Insufficient evidence has been submitted that supports the viability of live/work units in this particular area, contrary to policy EMP 4 Development Outside Defined Employment Areas of the adopted Unitary Development Plan (2004).*
 6. *The size and depth of the garden spaces to the rear of units 1, 2, 3, 6 and 7 would be wholly inadequate respect of the residential element of the scheme, failing to meet with the minimum 9 metre depth requirement as stated in policy HSG 7 Gardens in the adopted Unitary Development Plan (July 2004).*
 7. *In light of the narrow width of the access path, refuse trucks would be unable to enter the site, therefore, the positioning of the proposed refuse storage and disposal would be unacceptable, contrary to Policies URB 3 Urban Design, HSG 4 Residential Amenity, HSG 5 Layout and Design of New Residential Development and HSG 8 Backland and In-fill Development in the adopted Unitary Development Plan (July 2004).*
- 3.4 An application for a change of use from Office (Class B1) to Dwellinghouses (Class C3) under Prior Approval (LPA Ref. DC/14/87248) was refused on 9th June 2014 for the following description of development:
- Prior Approval for a change of use from office falling within Use Class B1(a) to provide 2 x 1 bed flats (C3) at 50 Ashgrove Road, Bromley BR1.*
- 3.5 The application was later brought to appeal (PINS Ref. APP/C5690/A/14/2224646), where it was dismissed by the Planning Inspector in December 2014 for the following reasons:
- The narrow width of the access road and the lack of provision of refuge for pedestrians;
 - The lack of access for emergency vehicles to the site; and
 - The lack of a suitable location for refuse collection.
- 3.6 Following the widening of the access road, a second application for a change of use under Prior Approval (LPA Ref. DC/15/91775) was refused on 8th June 2015 for the same description of development. This application was refused on the following grounds:
1. *The application site includes a scaffolders yard (B8). This does not fall within use class B1(a). The application therefore does not comply with Class O of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.*
 2. *The transport and highways impact of the proposed change of use is considered unacceptable due to the conflict between the B8 use to the rear of the site and the proposed C3 residential. It is considered this conflict will significantly compromise safety for future potential occupiers of the C3 residential use. This is contrary to Class Part 3 Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.*
- 3.7 This application was subsequently brought to appeal (PINS Ref. APP/C5690/W/15/3128688) and was also dismissed on 30th December 2015. The Planning Inspector dismissed the appeal on the grounds that the area included in the site boundary for the prior approval application did not solely comprise Class B1(a) Office use and therefore did not qualify for permitted development under Class O of the *Town and Country Planning (General Permitted Development) (England) Order (The GPDO)*, as amended.

4.0 Pre-application Discussions

- 4.1 A pre-application advice meeting was held on-site on 31st October 2016, which was attended by Joe Roberts (Planning Officer) and Tom Watts (Design Officer) from LB Lewisham.
- 4.2 The scheme which was presented proposed a short row of 3 houses to the rear of the site and a 2-storey block containing two flats to the front of the site.
- 4.3 The pre-application advice response from planning officers was received on 30th November 2016, and set out the following comments:

Principle of Development

- Officers will expect any future applications to demonstrate why the existing building is considered to be dilapidated, which may include the provision of a structural report. This stems from a recent visit by the Planning Inspector (associated with PINS Ref. APP/C5690/W/15/3128688), who claimed in their report that the site was still in use as a commercial yard (Class B8 use) and that the office building was still in active use. Evidence of unsuccessful marketing of the office space must be submitted as part of any future application.

Design, Scale and Massing

- Officers consider that three dwellings to the rear of the site represents an overdevelopment, and that two semi-detached dwellings would be more appropriate given the width of the plot. It is also considered inappropriate to reference the built form typology of the houses on Ashgrove Road, and that a unique, contemporary style should be used instead.

Impact on Neighbouring Amenities

- Officers strongly urge that the siting, scale, and height of the proposed buildings be reconsidered in order to avoid appearing overbearing in relation to neighbouring properties. It is considered by officers that heights of 3-storeys would be excessive in this location where 2-storeys is the prevailing height. Care must also be taken to avoid overlooking onto neighbouring properties when reorganising the layout of the site.

Standard of Accommodation

- Officers consider the proposed size and layout of individual units to be acceptable. However, it should be clarified in any future applications whether the proposed flat at first floor level will have access to the proposed rear garden. A balcony with a total area of 3.4m² does not meet the minimum standards as set out in the London Plan (2016, with consolidations since 2011).

Transport and Parking

- While the proposed development provides an appropriate quantum of car parking for a site with a low PTAL score (i.e. one space per unit), officers remain concerned that there is an inadequate level of access for emergency service vehicles and a lack of parking for visitors. The Highways Officer has therefore recommended that a swept-path analysis and an up-to-date parking survey be submitted as part of any future application.

Refuse and Recycling

- Officers consider the proposed location of a dedicated refuse collection point in part of the front garden of No. 48 Ashgrove Road to be acceptable in principle.

4.4 A copy of the full pre-application response is provided attached at **Appendix 2**.

5.0 Proposed Development

5.1 This Section provides a description of the proposed development. Further details of the proposal are set out in the accompanying Design & Access Statement prepared by March Design Associates.

5.2 This is an application for full planning permission for the redevelopment of the site at 50 Ashgrove Road, Bromley, BR1 4JW. The proposed description of development is as follows:

Full planning permission for the demolition of existing office building and construction of 4 new dwellings with associated vehicle and cycle parking, recycling and refuse facilities.

5.3 As outlined in the previous section, this scheme has been strongly informed by pre-application discussions with Planning Officers from LB Lewisham.

Demolition

5.4 Full planning permission is sought for the demolition of the existing office building. The Site is not within a Conservation Area and the office building is not statutorily or locally listed, and is not considered to be of any particular architectural merit. The demolition of this building is therefore appropriate in this context.

Layout, Massing and Design

5.5 The Site consists of a rectangular plot of land which is accessed by a private road. This connects to the main public road between Nos. 48 and 52 Ashgrove Road.

5.6 The proposed development comprises a 2-storey building with a low-pitched roof profile and a deep plan types at the rear of the Site comprising two semi-detached 4-bedroom houses, and a 2-storey flat block in a similar contemporary style in the centre of the Site comprising two 2-bedroom maisonettes with slightly curved roof profiles.

5.7 A recessed central area is proposed as part of both blocks for the location of a total of 14 photovoltaic (PV) panels, in order to reduce their visual impact and to achieve the optimum 30° degree angle and south-facing aspect for maximum performance and output. Each block will also be equipped with green roof technology.

5.8 The roof profiles of the proposed dwellings have been designed to reflect the existing industrial uses located to the south of the Site, and the proposed materials palette has been selected to complement the surrounding building typologies whilst retaining a unique, contemporary style.

Residential Provision

5.9 The proposed development comprises the following:

- 2 x 4 Bedroom 8 Person houses; and
- 2 x 2 Bedroom 4 Person maisonettes.

5.10 The proposed development comprises a total of 20 habitable rooms.

5.11 The provision of 4 units with a total of 20 habitable rooms on a site with an area of 0.12ha represents a proposed density of approximately 41 units per hectare (191 habitable rooms per

hectare). This complies with the recommended density range set out under **Policy 3.4 (Optimising Housing Potential)** of the London Plan (2016).

Housing Quality Standards

- 5.12 The proposed dwellings are designed to meet the minimum internal space standards as set out in **Policy 3.5 (Quality and Design of Housing Developments)** of the London Plan (2016, with consolidations since 2011).
- 5.13 Each 4-bedroom 8-person house has a Gross Internal Area (GIA) of 155m², and each 2-bedroom 4-person maisonette has a GIA of 83m², which exceeds the minimum standards set out in **Policy 3.5** of the London Plan.
- 5.14 An adequate amount of private outdoor amenity space, in line with **Standard 26** of the Mayor's Housing SPG (2016), has been provided to serve the proposed houses in the form of private gardens. Each of the proposed maisonettes would also have access to a garden area comprising an adequate amount of private outdoor amenity space.
- 5.15 All of the proposed dwellings have been designed to meet **Building Regulation Part M4(2) – Accessible and Adaptable Dwellings** standards.
- 5.16 All of the proposed dwellings have been designed to comply with the Nationally Described Space Standard (NDSS).

Access, Parking and Refuse/Recycling Storage

- 5.17 Access to the Site is provided via a private road connecting to the main road between Nos. 48 and 52 Ashgrove Road. The width of this road is 4.5m, which is considered to be sufficient to allow cars, bicycles, and pedestrians to pass each other.
- 5.18 A total of six car parking spaces would be provided as part of the development. This comprises two spaces associated with each house, and one space associated with each maisonette. This complies with the minimum standards set out in **Table 6.2 (Car Parking Standards)** of the London Plan (2016).
- 5.19 A total of eight cycle parking spaces would be provided, equivalent to two spaces per unit, which will be located within a secure shed in the private garden of each property. This complies with the minimum standards set out in **Table 6.3 (Cycle Parking Standards)** of the London Plan (2016).
- 5.20 Each dwelling will be provided with a secure refuse and recycling storage shed. Servicing and refuse collection will take place from Ashgrove Road from a bin collection point located to the south of the property at No. 48 Ashgrove Road.

6.0 Planning Policy

- 6.1 All planning applications within LB Lewisham must be determined in accordance with the Local Development Framework, which currently comprises the London Plan (2016), the LB Lewisham Core Strategy (2011), the LB Lewisham Development Management Local Plan (2014) and other adopted and emerging policy documents.
- 6.2 Consideration must also be given to the current National Planning Policy Framework (2012).
- 6.3 With regards to site-specific policy designations, the Site is within an Area of Archaeological Priority as identified on the LB Lewisham Local Plan Policies Map (2015).
- 6.4 A summary of the key planning policies relevant to this application are set out below.

National Planning Policy

National Planning Policy Framework (2012)

- 6.5 The National Planning Policy Framework (NPPF) was published by the Government on 27th March 2012. It sets out the Government's national policies for planning issues in a single, comprehensive document.

- 6.6 Paragraph 14 states that:

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For decision-taking, this means approving development proposals that accord with the development plan without delay.

- 6.7 Paragraph 25 states that:

Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

- 6.8 Paragraph 49 states that:

Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the Local Planning Authority cannot demonstrate a five-year supply of deliverable housing sites.

- 6.9 Paragraph 50 states that:

To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive, and mixed communities, Local Planning Authorities should identify the size, type, tenure, and range of housing that is required in particular locations, reflecting local demand.

- 6.10 The NPPF also supports high quality architectural design, and requires that development proposals address climate change and flooding issues, as well as conserving the natural and historic environment.

Technical Housing Standards: Nationally Described Space Standard (2015)

- 6.11 National Space Standards were brought into effect in March 2015, and outline the minimum space standards required for residential dwellings.

Ministerial Statement on Code for Sustainable Homes

- 6.12 A Written Ministerial Statement made on 26th March 2015 announced the abolition of the Code for Sustainable Homes. However, where authorities have existing policies on access, internal space, or water efficiency, these elements of the Code for Sustainable Homes standards still need to be met.

Ministerial Statement for Affordable Housing Contributions

- 6.13 In November 2014, a Written Ministerial Statement was issued requiring all new developments of ten residential units or fewer (and with a gross floorspace not exceeding 1,000m²) to be exempted from providing on-site and off-site affordable housing and tariff-based contributions.
- 6.14 This policy position has been upheld following a challenge to the decision which was overturned in the High Court of Appeals in May 2016. However, the Planning Inspectorate have clarified that while the Written Ministerial Statement should be given material weight, this should not automatically override the policies contained Local Plan. A robust evidence base is therefore required in order for Local Planning Authorities to enforce affordable housing contributions from small sites.
- 6.15 The LB Lewisham Local Development Framework does not seek affordable housing contributions from small sites of ten units or fewer.

Regional Planning Policy

The London Plan (March, 2016)

- 6.15. The London Plan provides an up-to-date strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development and growth of London over the next 20 to 25 years.
- 6.16. The following are considered to be key relevant policies in regards to this application.
- 6.17. **Policy 3.3 (Increasing Housing Supply)** states that Boroughs should “seek to achieve and exceed the relevant minimum borough annual average housing target” (1,385 new homes per year across Lewisham) which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.
- 6.18. **Policy 3.4 (Optimising Housing Potential)** states that “Development should optimise housing output for different types of location within the relevant density range”.
- 6.19. Given that the Site is located within an area dominated by semi-detached, lower density developments as defined in the London Plan. The site has a Public Transport Accessibility Level (PTAL) rating of 1 (where 1 is the lowest and 6 is the highest). Policy 3.4 sets out that for a site in

a suburban location with a PTAL of 1, the density range is 150-200 habitable rooms per hectare (hr/ha).

- 6.20. **Policy 3.5 (Quality and Design of Housing Developments)** states that the design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density, tenure, land use mix, and relationships with/provision of public, communal and open spaces.

Table 3.3 of the London Plan (2016) outlines the minimum space standards for residential dwellings in London. This has been set out below:

	Dwelling type (b) bedroom (p) persons-bedspaces	GIA sq m
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
2 story houses	2b4p	83
	3b4p	87
	3b5p	96
	4b5p	100
	4b6p	107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

- 6.21. **Policy 3.8 (Housing Choice)** states that new development should offer a range of housing choices, in terms of the mix of housing sizes and types. All new housing should be constructed to meet Lifetime Homes standards (now Building Regulations Part M4(2) – Accessible and Adaptable Dwellings).
- 6.22. **Table 6.3 (Cycle Parking Minimum Standards)** states that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards. One long-stay space should be provided for studios and 1-bedroom dwellings, and a minimum of two spaces for all other dwelling sizes. In addition, one space per 40 units should be provided for short-stay users.
- 6.23. **Table 6.2 (Car Parking Standards)** sets out maximum car parking standards. For 4-bedroom dwellings, a maximum of two spaces per dwelling is considered to be acceptable, and for 2-bedroom dwellings less than one space per dwelling should be provided.

Local Planning Policy

- 6.26. A review of the LB Lewisham Local Development Framework including the Core Strategy (2011), Development Management Local Plan (2014), and the Local Plan Proposals Map (2015) identifies that the Site is designated as an Area of Archaeological Priority, but is not subject to any other site-specific designations.

LB Lewisham Core Strategy (2011)

- 6.27. **Core Strategy Policy 1 (Housing Provision, Mix and Affordability)** states that the Council will seek an appropriate mix of dwelling types and sizes within a development, having regard to a number of factors including the character of the site and surrounding area, in particular the density and mix of any existing housing, access to private garden space for family-sized dwellings, and the location of shops, schools, and other services and infrastructure.
- 6.28. Point 7 of the above policy states that all new housing is to be built to Lifetime Homes standards (now Building Regulations Part M4(2) – Accessible and Adaptable Dwellings) and 10% of all housing is to be wheelchair accessible or easily adapted for those using a wheelchair (now Building Regulations Part M4(3) – Wheelchair User Dwellings) in accordance with the London Plan (2016).
- 6.29. **Core Strategy Policy 5 (Other Employment Locations)** states that:
- The Council will protect the scattering of employment locations throughout the Borough outside of Strategic Industrial Locations, Local Employment Locations and Mixed Use Employment Locations;
 - Employment land within Town Centres, which has the potential to contribute to a Major Town Centre, District Hub, a Local Hub, or other cluster of commercial and business uses, should be recommended for retention in employment use; and
 - Other uses including retail, community and residential will be supported if it can be demonstrated that site specific conditions including site accessibility, restrictions from adjacent land uses, building age, business viability, and viability of redevelopment show that the site should no longer be retained in employment use.
- 6.30. **Core Strategy Policy 8 (Sustainable Design and Construction and Energy Efficiency)** states that the Council is committed to prioritising the reduction of the environmental impact of all new developments, with a focus on minimising the overall carbon dioxide emissions of the development while improving sustainability aspects through sustainable design and construction, to meet the highest feasible environmental standards during design, construction and occupation. Development of over 10 residential dwellings will also be required to provide a Sustainability and Energy Statement.
- 6.31. **Policy 14 (Sustainable Movement and Transport)** states that a managed and restrained approach to car parking provision will be adopted to contribute to the objectives of traffic reduction while protecting the operational needs of major public facilities, essential economic development and the needs of people with disabilities. The car parking standards contained within the London Plan will be used as a basis for assessment.
- 6.32. Cycle parking will be required for new development and TfL guidelines will be used to assess provision.
- 6.33. **Policy 15 (High Quality Design for Lewisham)** states that for all development, the Council will:
- a. Apply national and regional policy and guidance to ensure highest quality design and the protection or enhancement of the historic and natural environment, which is sustainable,

- accessible to all, optimises the potential of sites and is sensitive to the local context and responds to local character;
- b. Ensure design acts to reduce crime and the fear of crime;
- c. Apply the housing densities as outlined in the London Plan, except where this is not appropriate to preserving or enhancing the characteristics of conservation areas;
- d. Use Building for Life standards to assess major planning applications to ensure design quality in new housing schemes;
- e. Ensure development is flexible and adaptable to change;
- f. Ensure any development conserves and enhances the borough's heritage assets, and the significance of their settings, such as conservation areas, listed buildings, registered parks and gardens, scheduled monuments and the Maritime Greenwich World Heritage Site.

Lewisham Development Management Local Plan (2014)

- 6.34. **Policy DM1 (Presumption in Favour of Sustainable Development)** states that sustainable development can play an important economic, social and environmental role in supporting growth and innovation, creating high quality built development with accessible local services, and protecting and enhancing the natural built and historic environment.

- 6.35. **Policy DM11 (Other Employment Locations)** states the following:

Sites in Town Centres, Local Hubs and Other Clusters of Commercial and/or Retail Uses

- 6.36. The Council will seek to retain employment uses (B Use Class) on sites and buildings in Town Centres, and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses, and where the use is compatible with the surrounding built context. A number of site characteristics and factors will be taken into account when reaching this assessment. This will include whether sites are well located in relation to the highway network; well located in relation to town centres and public transport; offer the potential for the expansion of existing in-situ businesses; offer the potential for the provision of workshop/industrial units for small and medium sized enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area; or provide lower cost accommodation suitable for small, start-up businesses.

Sites in Residential Areas

- 6.37. Applications for redevelopment for change to other business uses suitable for a residential area will be approved where:
- The site has become vacant for an appropriate length of time and evidence is provided that it is no longer suitable and viable for its existing or an alternative business use by reason of access difficulties or environmental incompatibility; and
 - That a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.

A mix of uses in a new scheme will be considered positively subject to the context of the site and meeting the requirements of other policies in this plan, including, in the case of any residential development proposed as part of a scheme an appropriate level of amenity and the suitability of the site for this use.

All Sites

- 6.38. The Council will seek contributions to training and/or local employment schemes where there is loss of local employment as a result of redevelopment or change of use.

- 6.39. **Policy DM 22 (Sustainable Design and Construction)** states that in addition to those policies in the London Plan and Lewisham's Core Strategy Policies 7 and 8, the Council will require all developments to maximise the incorporation of design measures to maximise energy efficiency, manage heat gain and deliver cooling using the following hierarchy:
- Passive solar design to optimise energy gain and reduce the need for heating;
 - Passive cooling design and natural ventilation to slow heat transfer and remove unwanted heat;
 - Mixed-mode cooling, with local mechanical ventilation/cooling provided where required to supplement the above measures, using (in order of preference) low energy mechanical cooling followed by air conditioning; and
 - Full-building mechanical ventilation/cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning.
- 6.40. **Policy DM29 (Car Parking)** states that 'car limited' major residential development will only be considered where there is:
- PTAL score 4 or higher, or where this can be achieved through investment in transport infrastructure and services;
 - No detrimental impact on the provision of on-street parking in the vicinity;
 - No negative impact on the safety and suitability of access and servicing;
 - Protection of required publicly accessible or business use car parking;
 - Inclusion of car clubs, car-pooling schemes, cycle clubs and cycle parking and storage; as part of a package of measures mitigating the need for on-site car parking provision;
 - An equitable split of parking provision between private and affordable residential development; and
 - On-site accessible priority parking for disabled drivers.
- 6.41. Wheelchair accessible car parking is required to be provided in accordance with best practice standards.
- 6.42. **Policy DM30 (Urban Design and Local Character)** sets out the following general principles:
- All development proposals will be required to attain a high standard of design. The requirements of **Core Strategy Policy 15** which sets out the aims for each Core Strategy spatial area will need to be met; and
 - Where relevant, development proposals will need to be compatible with and/or complement the urban typologies and address the design and environmental issues identified in Table 2.1 Urban typologies in Lewisham.
- 6.43. **Policy DM32 (Housing Design, Layout and Space Standards)** states the following:
- 6.44. The Council expects all new residential development to:
- Be attractive and neighbourly;
 - Provide a satisfactory level of privacy, outlook and natural lighting both for its future residents and its neighbours; and
 - Meet the functional requirements of future residents.
- 6.45. New-build housing development will be required to be:
- Sited to minimise disturbance from incompatible uses and be well located in relation to public transport with a high quality pedestrian environment;

- Provided with a readily accessible, secure, private and usable external space and include space suitable for children's play;
- Designed so that schemes in mixed tenure do not distinguish between public and private housing provision either in terms of quality of materials and design, or in level of amenities;
- Be safe and secure; and
- Ensure that internal layout and external design features ensure housing is accessible to all intended users.

6.46. **Policy DM33 (Developments on Infill Sites, Backland Sites, Back Gardens and Amenity Areas)** states that if a site is considered suitable for development, planning permission will not be granted unless the proposed development is of the highest design quality and relates successfully and is sensitive to the existing design quality of the streetscape, and is sensitive to the setting of heritage assets. This includes the spaces between buildings which may be as important as the character of the buildings themselves, and the size and proportions of adjacent buildings.

Backland Sites

6.47. New development on sites of this type will only be permitted where they provide:

- a proper means of access and servicing which is convenient and safe both for drivers and pedestrians;
- no significant loss of privacy, amenity, and no loss of security for adjoining houses and rear gardens; and
- appropriate amenity space in line with the policy requirements in DM Policy 32 (Housing design, layout and space standards).

Residential Development Standards SPD 2006 (updated 2012)

6.48. **Paragraph 2.13 (Amenity impacts – light, privacy, enclosure)** states that unless it can be demonstrated that privacy can be maintained through design, there should be a minimum separation of 21 metres between directly facing habitable room windows on main rear elevations. This separation will be maintained as a general rule but will be applied flexibly dependent on the context of the development. The minimum distance between habitable rooms on the main rear elevation and the rear boundary, or flank wall of adjoining development, should normally be 9 metres or more. These guidelines will be interpreted flexibly depending on the context of the development.

7.0 Planning Considerations

- 7.1. As previously set out in Section 5, the proposed development seeks to provide four residential dwellings comprising 2 x 4 bedroom semi-detached houses and 2 x 2 bedroom maisonettes.
- 7.2. In this Section we address the material planning considerations associated with the development.

Demolition of Existing Building

- 7.3. The existing building is of limited architectural merit and does not provide any significant visual benefit to this particular part of Lewisham. The building is not locally or statutorily listed and is not located within a Conservation Area.
- 7.4. A Conditions Survey has been prepared by Court Buckingham Ltd. in support of this planning application which provides evidence that the existing office building is in poor condition and that the renovation of the building would not be viable option.
- 7.5. An Asbestos Report has also taken place to test a sample of the existing roof, revealing that asbestos is present on the Site. It has therefore been recommended that the roof be replaced at the earliest opportunity in order to avoid further deterioration and contamination.
- 7.6. Given that the proposed development would deliver a high quality and architecturally attractive scheme in place of a dilapidated and underused building, it is considered that the demolition of the existing office building would be acceptable in this context.

Principle of Development

Loss of the Existing Commercial Use

- 7.7. The Site is currently occupied by a single-storey office building which has been vacant for the past six months. To the rear of the Site is a former scaffolders yard, which has not been in commercial use for two-and-a-half years.
- 7.8. The Site is not a designated employment location as identified on the LB Lewisham Local Plan Proposals Map (2015), although it is afforded some level of protection through **Core Strategy Policy 5 (Other Employment Locations)** of the LB Lewisham Core Strategy (2011). This states that the Council will seek to protect the scattering of employment sites throughout the Borough outside of Strategic Industrial Locations, Local Employment Locations and Mixed Use Employment Locations.
- 7.9. Other uses including retail, community and residential uses will be supported if it can be demonstrated that site-specific conditions including site accessibility, restrictions from adjacent land uses, building age, business viability, and viability of redevelopment show that the site should no longer be retained for employment use.
- 7.10. We will now consider each of these criteria below in order to demonstrate that it is no longer necessary for the Site to be retained for employment use.

Site Accessibility

- 7.11. The Site is located within a predominantly residential area and sits behind a row of semi-detached properties. It is located outside of a Town Centre and occupies a backland site which does not present a particularly desirable location for a business uses.
- 7.12. The Site is accessed via a private access road which connects to the main road between Nos. 48 and 52 Ashgrove Road. Due to the backland nature of the Site, accessibility is inherently restricted.

Restrictions from Adjacent Land Uses

- 7.13. The Site is immediately adjacent to The Ashgrove Estate to the south, and residential properties to the north and east. This residential setting restricts the potential for commercial uses on the Site due to the need to protect neighbouring amenity and ensure that no conflicts arise with nearby residential use.

Building Age

- 7.14. The exact age of the existing office building is not known, but it is likely to have been constructed in the 1960s or 1970s. At present, the building is showing signs of significant deterioration. A Conditions Survey has been produced by Court Buckingham Ltd. in support of this planning application, which demonstrates that it would be financially unviable to refurbish the building to a standard which would comply with current Building Regulations.
- 7.15. Furthermore, an Asbestos Report has been undertaken which has identified that the roof contains asbestos and needs to be replaced as soon as possible.
- 7.16. Both of these documents have been submitted in as part of this planning application.

Business Viability

- 7.17. The existing office building has been vacant for the past six months, and the previous occupiers have moved to more suitable office premises in a better quality building. The former scaffolders yard to the rear of the Site has not been in commercial use for the past two-and-a-half years.
- 7.18. Despite active marketing of these properties, it is clear that the limited access arrangements and the constraints of the Site make it an unattractive prospect for these business uses.

Viability of Redevelopment

- 7.17. As identified in the accompanying Conditions Survey, the provision of an office use on the Site is likely to be financially unviable due to the costs that would be incurred in bringing the building in line with current Building Regulations and replacing the current roof.
- 7.18. The Site is in a location that is suitable for residential development and the construction of new housing on this previously developed (brownfield) land would represent a sustainable contribution towards meeting local housing need within the Borough.
- 7.19. In addition to the above criteria, **DM Policy 11 (Other Employment Locations)** of the LB Lewisham Development Management Local Plan (2014) states that applications for redevelopment for change to other uses suitable for a residential area will be approved where:
- The site has become vacant for an appropriate length of time and evidence is provided that it is no longer suitable and viable for its existing (or an alternative) business use by reason of access difficulties or environmental incompatibility; and

- That a suitable period of active marketing of the site for re-use/redevelopment for business uses that reflects market values has been undertaken through a commercial agent.
- 7.20. The existing office building has been vacant for six months and the former scaffolders yard has not been in commercial use for two-and-a-half years, despite an active and ongoing marketing campaign. Further details are provided in the accompanying Marketing Report produced by KALMARs Commercial, which covers a period of 27 months between December 2014 and March 2017. The limited accessibility of the Site from Ashgrove Road combined with the costs involved in refurbishing the existing office building have been shown to be prohibitive to prospective tenants.
- 7.21. As such, we consider that it would be unreasonable for the Council to retain this site for employment uses in light of this information, and that redevelopment for residential use would represent a more sustainable use of this previously-developed (brownfield) land.

Backland Development

- 7.22. The Site can be classed as a 'Backland Development Site' as set out within **Policy DM 33 (Development on Infill Sites, Backland Sites, Back Gardens, and Amenity Areas)** of the LB Lewisham Development Management Local Plan (2014). **Section B (Backland Sites)** states that new development on sites of this type will only be permitted where they provide:
- A proper means of access and servicing which is convenient and safe for both drivers and pedestrians;
 - No significant loss of privacy, amenity, and no loss of security for adjoining houses and rear gardens; and
 - Appropriate amenity space in line with the requirements set out in **DM Policy 32 (Housing Design, Layout, and Space Standards)**.
- 7.23. The Site is provided with a proper means of access and servicing via a private road that connects to the main road between Nos. 48 and 52 Ashgrove Road. At 4.5m wide, this road is wide enough to provide a safe refuge for pedestrians as well as allowing two cars to pass each other at low speeds.
- 7.24. The proposed layout of the scheme, in particular the central forecourt, has been designed to allow large vehicles (including emergency services) to enter and exit the Site safely.
- 7.25. This has been demonstrated in the accompanying Transport Statement prepared by ADL Transportation Ltd. in support of this application, which includes a swept-path analysis and up-to-date parking survey.
- 7.36. The proposed development has been designed to optimise available space within the Site whilst protecting the amenity of surrounding properties. There are no windows proposed on the northern elevations of either the houses or maisonettes in order to prevent any direct overlooking into neighbouring gardens.
- 7.37. The heights of the proposed buildings are lower than the adjacent industrial warehouse to the south, and have a lower roof line than the majority of the properties along Ashgrove Road. This has been done to ensure that the development would not be overbearing or bulky when viewed in the context of the surrounding area.
- 7.38. The proposed houses and maisonettes would overlook the central forecourt area where car parking has been provided, offering passive surveillance for the units and ensuring the security of residents.

- 7.39. Each of the proposed dwellings has been provided with private and secure outdoor amenity space in the form of a rear gardens. The minimum required depth of 9m, as set out in **Section 3.10 (Gardens and Amenity Space)** of the LB Lewisham Residential Standards SPD (2012), has been met, and side gates have been provided for security purposes.

Design

Layout

- 7.40. The proposed layout has been designed to optimise the potential of the Site and to make sustainable use of an area of previously-developed 'brownfield' land.
- 7.41. The two 2-storey houses have been located to the western edge of the Site, and the 2-storey flat block is located in the centre of the Site between the new houses and no. 48 Ashgrove Road. A central forecourt is formed between the two blocks, where car parking spaces serving each unit are provided.
- 7.42. In response to Officers' comments, the proposed dwellings have been brought in from the boundary line by 1m in order to preserve the amenity of neighbouring occupiers.
- 7.43. In order to avoid overlooking onto neighbouring gardens, no windows are provided on the flank walls of either block. A separating distance of 25m from the rear of No. 48 Ashgrove Road has been maintained in order to preserve the privacy of all residents.
- 7.44. We therefore consider the proposed layout of the development to be acceptable.

Height, Scale and Massing

- 7.45. In response to Officers' comments, the total number of units has been reduced. The third house to the western edge of the Site has been removed, leaving two semi-detached houses in its place. This was considered by Officers to be a more appropriate scale of development in pre-application discussions.
- 7.46. The proposed development at 2-storeys does not exceed the prevailing height of the surrounding properties, and is subservient to existing development. This is appropriate given the 'backland development' nature of the Site.
- 7.47. Both the houses and the maisonettes have been designed with low-pitched roof profiles, and there are no external projections (such as balconies), further reducing the perceived massing of the development.
- 7.48. We therefore consider the proposed height, scale, and massing of the development to be acceptable.

Density

- 7.49. The proposed scheme would provide four new dwellings with a total of 20 habitable rooms. Based on a Site Area of 0.12ha, the scheme would represent a density of approximately 41 units per hectare (191 habitable rooms per hectare).

- 7.50. This is within the recommended density range of 35-75 units per hectare (150-200 habitable rooms per hectare) as set out under **Policy 3.4 (Optimising Housing Potential)** of the London Plan (2016) for a site in a 'Suburban Setting' with a PTAL score of 1b (Very Poor).
- 7.51. We therefore consider the proposed density of the development to be acceptable.

Materials

- 7.52. The proposed dwellings are of a contemporary style that complements rather than replicates the built form typology of the nearby houses on Ashgrove Road. This was considered by Planning Officers to be the most appropriate response during pre-application discussions.
- 7.53. To achieve this, a varied palette of different colours and textures of brick has been chosen in order to create visual interest without appearing incongruous to the surrounding area.
- 7.54. In addition to this, green roof technology is proposed to be installed as part of both residential blocks, adding further texture and visual interest to the development.
- 7.55. Further details are provided in the accompanying Design and Access Statement prepared by March Associates.
- 7.56. We therefore consider the materials used in the proposed development to be acceptable.

Residential Mix and Tenure

- 7.57. The scheme provides two 4-bedroom houses and two 2-bedroom maisonettes for private market sale. The Council's Local Plan does not set out a preferred mix for residential dwellings, but encourages a site-specific response based on local context and current housing need.
- 7.58. We consider that the provision of two large 'family-sized' houses as part of the proposed development is reflective of the prevailing typology of the surrounding area. By providing two smaller maisonettes a broader mix of housing sizes is provided, enabling the proposed development to better contribute to housing need in the Borough.
- 7.59. We therefore consider the residential mix and tenure of the proposed development to be acceptable.

Residential Amenity

Internal Space Standards

- 7.60. Each dwelling meets the minimum internal space standards as set out in **Policy 3.5 (Quality and Design of Housing Development)** of the London Plan (2016). These dimensions have been set out in the Table 01 below:

TABLE 01: MINIMUM INTERNAL SPACE STANDARDS		
Dwelling	Proposed Floorspace (GIA)	Minimum Requirement
House 1	155m ²	107m ²
House 2	155m ²	107m ²

Maisonette 1	83m ²	70m ²
Maisonette 2	83m ²	70m ²

- 7.61. We therefore consider the proposed internal dimensions to be acceptable.

Amenity Space/Open Space

- 7.62. Each of the proposed dwellings will be provided with private outdoor amenity space in the form of a rear garden. All the garden sizes would meet or exceed the minimum depth of 9m as set out in **Section 3.10 (Gardens and Amenity Space)** of the LB Lewisham Residential Standards SPD (2012).

- 7.63. We therefore consider the proposed private outdoor amenity space provision to be acceptable.

Overlooking/Privacy

- 7.64. The location of the Site to the rear of residential properties (i.e. backland development) means that there is a significant potential for overlooking onto the rear gardens of Nos. 48 and 52 Ashgrove Road to the north and east.
- 7.65. In order to prevent this, each of the proposed houses and maisonettes have been further set back from the site boundary line to the north by 1m. No windows are proposed to be placed within the north and south-facing flank walls of the blocks, and a window-to-window separation distance of 25m between the maisonette block and No. 48 Ashgrove Road has been maintained.
- 7.66. We therefore consider that the proposed development would not result in unacceptable overlooking or loss of privacy for neighbouring occupiers.

Energy and Sustainability

- 7.67. As the proposed development of four units is not considered to be a major development, the scheme is only required to make the 'fullest contribution possible' in reducing CO² emissions as set out in **Policy 5.2 (Minimising Carbon Dioxide Emissions)** of the London Plan (2016).
- 7.68. An overall reduction of 22% in site-wide regulated CO² emissions has been achieved (with reference to Part L1A (2013) of the Building Regulations), which has been demonstrated as the 'fullest possible contribution' in the accompanying Sustainability Statement prepared by SRS Partnership.
- 7.69. A total of 14 PV panels are provided as part of the development, which will achieve an output of 3.5kWp in ideal conditions.
- 7.70. The estimated daily water consumption for the development has been calculated to be 102.8 litres per person, meeting the target usage of 105 litres or less per person per day as set out in **Policy 5.15 (Water Use and Supplies)** of the London Plan (2016).
- 7.71. We therefore consider that the proposed development to be energy-efficient and sustainable.

Parking, Refuse and Servicing

Car and Cycle Parking

- 7.72. As discussed previously in this Statement, the scheme would provide a total of six car parking spaces. These would be allocated as two spaces for each of the 4-bedroom houses and one space for each of the 2-bedroom maisonettes. As shown on the Site Plan (Drawing No. P.51), these spaces would be provided to the front of each of the dwellings.
- 7.73. Given the low PTAL score of the Site and its location in a 'Suburban Setting', this level of provision is in compliance with the recommended maximum standards for 2-bedroom flats and 4-bedroom houses as set out in **Table 6.2 (Car Parking Standards)** of the London Plan (2016).
- 7.74. We therefore consider the proposed car parking provision to be acceptable.
- 7.75. A total of eight secure cycle parking spaces would be provided as part of the proposed development. These have been allocated as two spaces per 4-bedroom house and 2-bedroom maisonette. This is compliant with the minimum standards set out in **Table 6.3 (Cycle Parking Minimum Standards)** of the London Plan (2016).
- 7.76. We therefore consider the proposed cycle parking provision to be acceptable.

Refuse and Recycling

- 7.77. A secure bin store would be provided in the rear garden of each of the new dwellings, with a refuse collection point provided on the corner of the private access road where it meets Ashgrove Road. This arrangement was proposed during pre-application discussions and was considered by Planning Officers to be acceptable.
- 7.78. We therefore consider the proposed refuse and recycling arrangements to be acceptable.

Land Contamination

- 7.79. As part of the previous prior approval application on the Site (LPA Ref. DC/14/087248), both a Phase 1 Preliminary Risk Assessment (dated 15th November 2013) and a Phase 2 Site Investigation Report (dated 7th March 2014) were produced by Terragen Environmental Consultants Ltd.
- 7.80. The Phase 2 Site Investigation Report demonstrates that there is not a significant risk of land contamination associated with the proposed development. However, the Report states that, should the existing hardstanding on-site be removed as part of any future development, the conclusions of the Report may have to change.
- 7.81. Given that the development proposed as part of this application involves the removal of the existing hardstanding and the demolition of the existing office building, we propose that the Site Investigation Report be reviewed.
- 7.82. We therefore consider that an updated Land Contamination Assessment should be secured by way of planning condition.

Trees

- 7.83. Although the Site itself does not contain any trees, there are several trees which border the Site on neighbouring properties. Accordingly, an Arboricultural Impact Assessment has been prepared by Sylvanarb.
- 7.84. The Assessment sets out the arboricultural work that would be required in order to facilitate the development. The trees which have been identified are not covered by a Tree Preservation Order (TPO). Overall, the Assessment concludes that the proposed development makes good use of the developable area whilst recognising the constraints presented by all but four low value trees, ensuring that the arboricultural impacts of the scheme are minimised.
- 7.85. We therefore consider the impact of the proposed development on surrounding trees to be acceptable.

Archaeology

- 7.86. An Archaeological Assessment (desk-based) has been prepared by AOC Archaeology Group in support of this planning application.
- 7.87. The Assessment has identified the Site as having a 'high potential' for 20th century remains; a 'medium potential' for Medieval and post-Medieval period remains; and a 'low potential' for Prehistoric and Roman remains to have survived on the Site.
- 7.88. We therefore consider that an Archaeological Watching Brief should be secured by way planning condition, to be undertaken during any ground-breaking works.

Community Infrastructure Levy (CIL)

- 7.89. It is noted that the proposed development would be liable to pay both Mayoral CIL and Local CIL.
- 7.90. The Mayoral CIL rate for residential development in Lewisham is £35/m² as set out in the Mayoral CIL Charging Schedule (2012).
- 7.91. For the purposes of Local CIL the scheme is located within CIL Charging Zone 2, for which residential development is charged at £70/m² as set out in the LB Lewisham CIL Charging Schedule (2015).

8.0 Conclusion

- 8.1. This Planning Statement has been produced by bptw planning on behalf of Northstar 2000 Ltd. and is submitted in support of a full planning application at 50 Ashgrove Road, Bromley, BR1 4JW for the following description of development:

Full planning permission for the demolition of the existing office building and construction of 4 new dwellings with associated vehicle and cycle parking, recycling and refuse facilities.

- 8.2. This application has been informed by pre-application discussions that took place with Planning Officers in October 2016. This final proposal has sought to incorporate Officers' comments in order to present a scheme which maximises the potential of this previously-developed (brownfield) site.
- 8.3. The existing office building and former scaffolders yard are both currently vacant (for a period of six months and two-and-half-years respectively). This Planning Statement and associated technical reports have clearly set out the reasons why commercial interest in the Site has not been forthcoming, and the reasons why residential development would represent a more sustainable use for the Site.
- 8.4. Furthermore, this Statement has set out the ways in which the proposed development has been designed to meet the requirements for a 'backland site' in terms of providing a scheme which is sensitive to access requirements, and the protects the amenities of both neighbours and future residents.
- 8.5. It is considered that the proposed development meets the relevant national, regional, and local planning policy requirements, and represents a high quality scheme with a unique, contemporary style which will make a positive contribution towards housing need in the Borough.
- 8.6. We therefore respectfully request that this planning application be granted permission.

Appendix A

Tree Survey Data & Plan

Tree Survey Key

<i>Tree No.</i>	Tree Number - cross-referenced with tree numbers shown on Tree Survey Plan.		
<i>Hgt (m)</i>	Height - estimated in metres.		
<i>Dia. at 1.5m (mm)</i>	Stem Diameter - in millimetres recorded at 1.5m above highest adjacent ground level.		
<i>No. of Stems</i>	Number of main stems arising from below 1.5m above ground level. M = Multi-stemmed tree.		
<i>Crown Spread N,E,S,W (m)</i>	Given as a radial measurement in metres from the centre of the stem to the extremity of the canopy at the four main compass points NESW.		
<i>Crown Cl/nce (m)</i>	Crown Clearance - Height in metres of crown above adjacent ground level.		
<i>Age Class</i>	Y	Young	Staked or recently established tree at the fast growing early stage of establishment.
	SM	Semi mature	An established tree at a stage of rapid growth with increasing future growth potential
	M	Mature	A tree that is at a stage of constant growth nearing ultimate canopy size.
	V	Veteran	A mature tree, often of great ecological or heritage importance, that has reached a stage of natural decline.
<i>Physiological Condition</i>	Provides some evidence of the general well being of the tree. Assessed by comparison of growth characteristics with similar species in the locality and/or from personal experience.		
	Given in four classifications:		
	G	Good	
	F	Fair	
	P	Poor	
	D	Dead	

<i>Preliminary Mgt</i>	Recommendations for tree work to bring the trees to an acceptable and safe standard in context with the current site use.
<i>Category</i>	<p>Category of quality assessment allocated to a tree derived from an individuals potential contribution to a site: considering tree health, condition, age and value. Full description given in Table 1 of BS5837:2012 '<i>Trees in Relation to Design, Demolition and Construction</i>'.</p> <p>Trees are colour coded on the attached Tree Survey plan.</p> <p>Given in four categories:</p> <p>A - Green - Trees of high quality and value (likely to contribute a further 40+ years)</p> <p>B - Blue - Trees of moderate quality and value (likely to contribute a further 20+ years)</p> <p>C - Grey - Trees of low quality and value (likely to contribute a further 10+ years)</p> <p>U- Red - Trees which may require removal on health and safety grounds, be in decline, infected by significant pathogens or, due to their current condition would lose their existing value within 10 years.</p> <p>A provisional category may be allocated pending further advised inspection/tree work.</p>
<i>RPD (m)</i>	Root Protection Distance - The distance in metres of the radius of a circle depicting the root protection area required for an individual tree.
<i>RPA (m)</i>	Root Protection Area – The total area of ground to be protected around an individual tree.
<i>(p)</i>	Provisional quality assessment category – the highest expected category is allocated to the tree based on an incomplete preliminary visual inspection due to limited access ie. ivy clad, basal growth, dense undergrowth or off-site tree.
<i>(e)</i>	Estimated figure due to obstruction such as ivy or off-site tree.

Tree Survey Data

TREE NO	SPECIES	HEIGHT (m)	DIAMETER AT 1.5m or arf (mm)	NO. OF STEMS	CROWN SPREAD N,E,S,W (m)				CROWN CL/NCE (m)	AGE CLASS	PHYSIOLOGICAL CONDITION	STRUCTURAL CONDITION	PRELIMINARY MGT RECOMMENDATIONS	ESTIMATED REMAINING CONTRIBUTION	CATEGORY	RPD (m)	RPA (m2)	NOTES
G1	Eucalyptus	8	200e x 4	4	1	3	4	7	5	Semi-mature	Good	Fair		>40	C1	4.8	72	Off-site - no access or clear view of tree/s, assumed 4-stem tree.
T1	Ash	5	250e	1	2	2	2	2	0	Semi-mature	Fair	Poor		20-40	C1	3.0	28	On boundary, topped at 1.5m.
T2	Holly	8	250e	1	2.5	2.5	2.5	2.5	0	Semi-mature	Good	Good		>40	C1	3.0	28	Off-site.
T3	Ash	7	90	1	3	2	0	1	3.5	Young	Good	Fair		>40	C1	1.1	4	Suppressed.
T4	Ash	9	230	1	3.5	3	5	5	2	Semi-mature	Fair	Fair		>40	C1	2.8	24	Reduced vigour, suppressed to east by removed tree.
T5	Lawson Cypress	9	220	1	4	2	2	3	2	Semi-mature	Good	Fair		20-40	C1	2.6	22	Off-site, bifurcated at 3.5m.
T6	Apple	8	300e	1	5	2	3	2	5	Semi-mature	Good	Good		>40	C1	3.6	41	Off-site.
T7	No access	9	<250e	M	5	2	2	2	3	Semi-mature	Good	Fair		20-40	C1	3.0	28	Off-site, no access, estimated basal stem diameter.

TREE NO	SPECIES	HEIGHT (m)	DIAMETER AT 1.5m or arf (mm)	NO. OF STEMS	CROWN SPREAD N,E,S,W (m)				CROWN CL/NCE (m)	AGE CLASS	PHYSIOLOGICAL CONDITION	STRUCTURAL CONDITION	PRELIMINARY MGT RECOMMENDATIONS	ESTIMATED REMAINING CONTRIBUTION	CATEGORY	RPD (m)	RPA (m2)	NOTES
T8	Lawson Cypress	10	270e	1	3	3	3	2	3	Semi-mature	Good	Good		>40	C1	3.2	33	Off-site, no access.
T9	Amelanchier	5	100e x 4	4	2	2	2	2	3	Semi-mature	Poor	Poor		< 10	U	2.4	18	Off-site, no access, reduced vigour/dieback.
T10	Elder	6	100e x 5	5	5	2	2	3	0	Semi-mature	Fair	Fair		10-20	C1	2.7	23	Off-site, no access.
T11	Lawson Cypress	11	180e x 3	3	3	3	3	3	1	Semi-mature	Good	Fair		20-40	C1	3.7	44	Off-site, no access.

Table 1 (BS5837:2012) – Cascade Chart for Tree Quality Assessment.

Category & Definition		Criteria (Including subcategories where appropriate)			Identification On Plan
TREES UNSUITABLE FOR RETENTION (See Note)					
<div>Category U</div> <div>Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years</div>	<div><div><div>Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (i.e. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning)</div><div>Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline</div><div>Trees infected with pathogens of significance to the health and/or safety of other trees nearby or very low quality trees suppressing adjacent trees of better quality</div></div><div>NOTE Category U trees can have existing or potential conservation value which it might be desirable to preserve; see 4.5.7.</div></div>				DARK RED
TREES TO BE CONSIDERED FOR RETENTION					
Category & Definition	Criteria — Subcategories				
	1 Mainly arboricultural values	2 Mainly landscape values	3 Mainly cultural values, including conservation		
<div>Category A</div> <div>Trees of high quality</div> <div>With an estimated remaining life expectancy of at least 40 years</div>	Trees that are particularly good examples of their species, especially if rare or unusual, or essential components of groups, or of formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)	Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features	Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)	LIGHT GREEN	
<div>Category B</div> <div>Trees of moderate quality</div> <div>With an estimated remaining life expectancy of at least 20 years</div>	Trees that might be included in the high category, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation	Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality	Trees with material conservation or other cultural value	MID BLUE	
<div>Category C</div> <div>Trees of low quality</div> <div>With an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm</div>	Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories	Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value, and/or trees offering low or only temporary/transient landscape benefits	Trees with no material conservation or other cultural value	GREY	

Appendix B

Tree Protection Measures

- **Tree Protection Plan**
- **Tree Protection Specification**
- **Tree Protection Warning Sign**

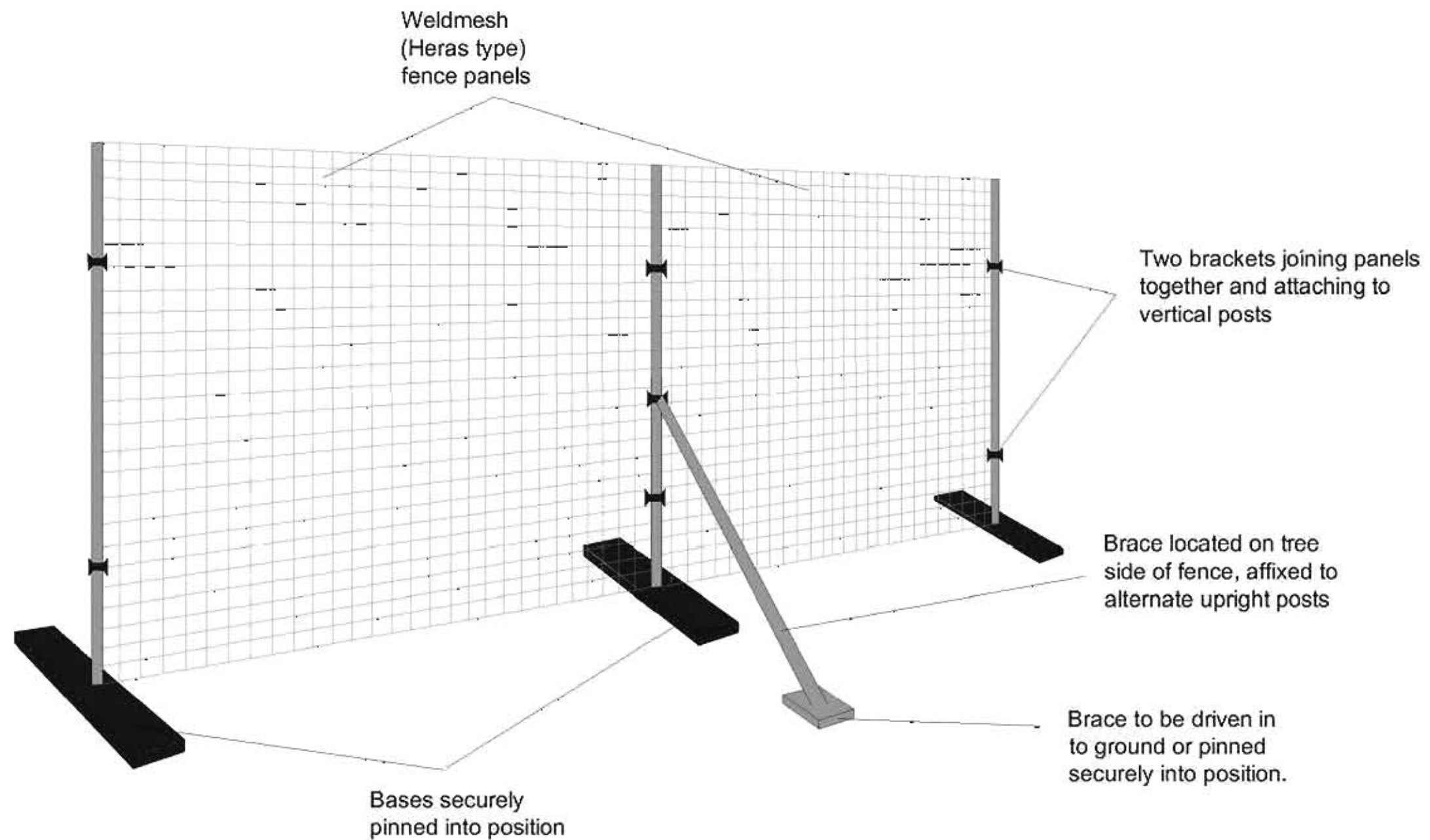
Principles of Tree Protection

- i) The majority of damage to tree root systems on development sites occurs either at the early stages of development when protection measures have not been installed promptly enough, or at the final stages of development when protective fencing, having been adequate throughout development, is taken down prematurely.
- ii) The tree protection measures described are to be installed prior to the commencement of any other works associated with the proposal.
- iii) The contract manager is to be made aware of their responsibility to ensure tree protection measures are maintained throughout the development of the site. Casual daily inspections of fencing and a weekly written record of inspection is recommended.

General Precautions

- No materials, that are likely to have an adverse effect on tree health, such as oil, bitumen or cement, will be stored or discharged on unsealed surfaces within 10 metres of the trunk of the retained trees. Consideration for the slope of the ground is to be given when discharging or storing materials that are potentially harmful to trees.
- No fires to be lit where flames could extend to within 5m of foliage, branches or trunks of trees.
- No signs, cables or other items are to be attached to trees.
- Details of service runs have not been provided. All trenching works are to be carried out in accordance with the guidance provided in the National Joint Utilities Guidance document NJUG Vol.4.
- Where tree roots over 25mm in diameter are encountered during excavations within the vicinity of retained trees advice from the arboricultural advisor or LPA tree officer is to be sought prior to severing any such roots and continuing with works.
- Any proposed level changes within Root Protection Areas are to be approved by the Local Authority Tree Officer prior to work being carried out.

Tree Protection Fencing



Sylvan Arb
Arboricultural and Woodland
Management Consultants

**Type 2: Tree
Protection Fencing**

Site Address:

50 Ashgrove Road
Bromley
Kent
BR1 4JW

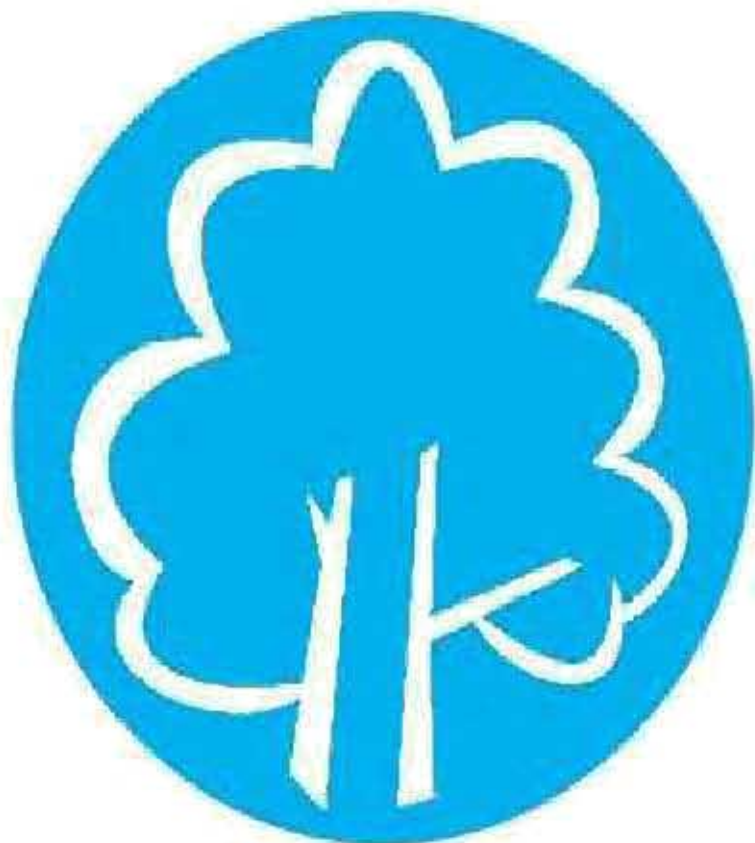
By: C. Barkel

Date: February 2017

Ref: AR/TPF/Spec1

Scale: NTS

Tree Protection Fencing Specification
To be installed in locations shown in **RED** on
Tree Protection Plan Ref: AR/TPP/1268-02



**PROTECTIVE FENCING. THIS
FENCING MUST BE
MAINTAINED IN ACCORDANCE
WITH THE APPROVED PLANS
AND DRAWINGS FOR THIS
DEVELOPMENT.**



**TREE PROTECTION AREA
KEEP OUT !**

**(TOWN & COUNTRY PLANNING ACT 1990)
TREES ENCLOSED BY THIS FENCE ARE PROTECTED BY
PLANNING CONDITIONS AND/OR ARE THE SUBJECTS OF A
TREE PRESERVATION ORDER.
CONTRAVENTION OF A TREE PRESERVATION ORDER MAY
LEAD TO CRIMINAL PROSECUTION**

**ANY INCURSION INTO THE PROTECTED AREA MUST BE
WITH THE WRITTEN PERMISSION OF THE LOCAL
PLANNING AUTHORITY**

!KEEP OUT!

Protected Trees

No Contractor Access Without Local Authority Permission

**REPORT ANY DAMAGE
TO TREES OR FENCING IMMEDIATELY TO
LB LEWISHAM TREE OFFICER
Tel: 020 8314 6000**



**Sylvanarb - Arboriculture, Landscaping, Woodland Management.
Tel:01634 724023 / Email: info@sylvanarb.co.uk**

Appendix C

Temporary Ground Protection Specification

Temporary Ground Protection Specification

- i) Tree protection requirements are to be included in the tender specification when seeking quotes from contractors to carry out the building works.
- ii) Prior to installing ground protection the contractor is to determine whether the area is to be used for vehicles/plant or for pedestrian use only. The following specifications are then to be used accordingly as recommended in BS5837:2012:

1. For pedestrian use only.

- a) Side-buttressed scaffold boards placed over a layer of compressible material.
 - Lay a porous geotextile membrane over the area to be protected.
 - Spread a layer of compression-resistant material over the geotextile. Woodchips resulting from tree pruning operations may be used and spread to a depth of 100mm.
 - Lay side-buttressed scaffold boards or similar boarding over the compressible layer.
- b) Scaffold boards suspended over the ground on a scaffold framework.
 - Install a raised scaffold framework across the area of protection.
 - The framework is to cover the entire area of ground to be protected (see Tree Protection Plan) and form a level platform to support the suspended floor.
 - Affix side buttressed scaffold boards or similar to the framework to form a suspended floor over the protected area.

2. For vehicles/plant up to a gross weight of 2 tonnes.

- a) Proprietary ground protection panels, such as *Traxpanels* from TPA Ltd, laid over compression-resistant material.
 - Lay a porous geotextile membrane over the area to be protected.
 - Spread a layer of compression-resistant material over the geotextile. Woodchips resulting from tree pruning operations may be used and spread to a depth of 150-200mm.
 - Install proprietary ground protection panels across area of protection.
- iii) Ground protection is to be installed as shown on the Tree Protection Plan at Appendix B.
- iv) The special ground protection measures described are to be installed at the same time as the tree protection fencing is erected and prior to any other development works being carried out on the site.
- v) TGP and Tree Protection Fencing is to be maintained throughout the development phase and through to completion of the project.
- vi) The site manager is to be made aware of their responsibility to ensure tree protection measures are maintained throughout the development of the site. Casual daily inspections of fencing and a weekly written record of inspection is recommended.

TREE PROTECTION MEASURES ARE NOT TO BE ALTERED OR REMOVED WITHOUT THE PRIOR APPROVAL OF AN ARBORICULTURAL ADVISOR OR THE LPA TREE OFFICER.