

## **London Borough of Bromley Local Plan Examination – Matters Statement**

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**Date** 17 November 2017

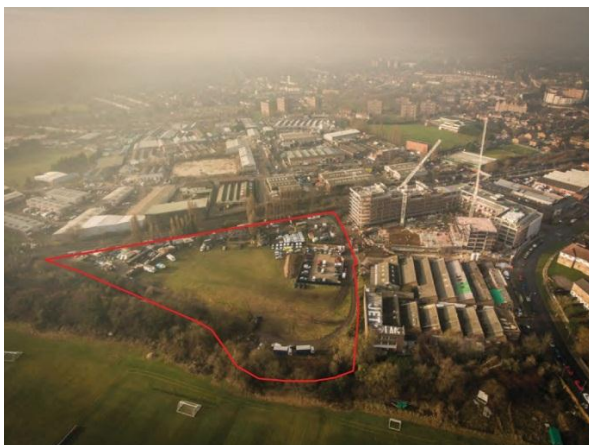
**From:** West & Partners on behalf of Dylon 2 Limited and Relta Limited (Objection 134 & 135)

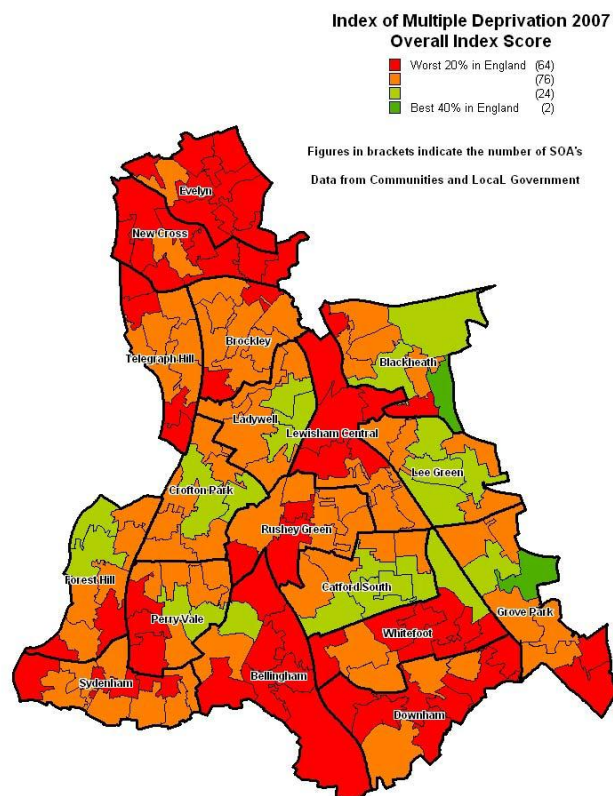
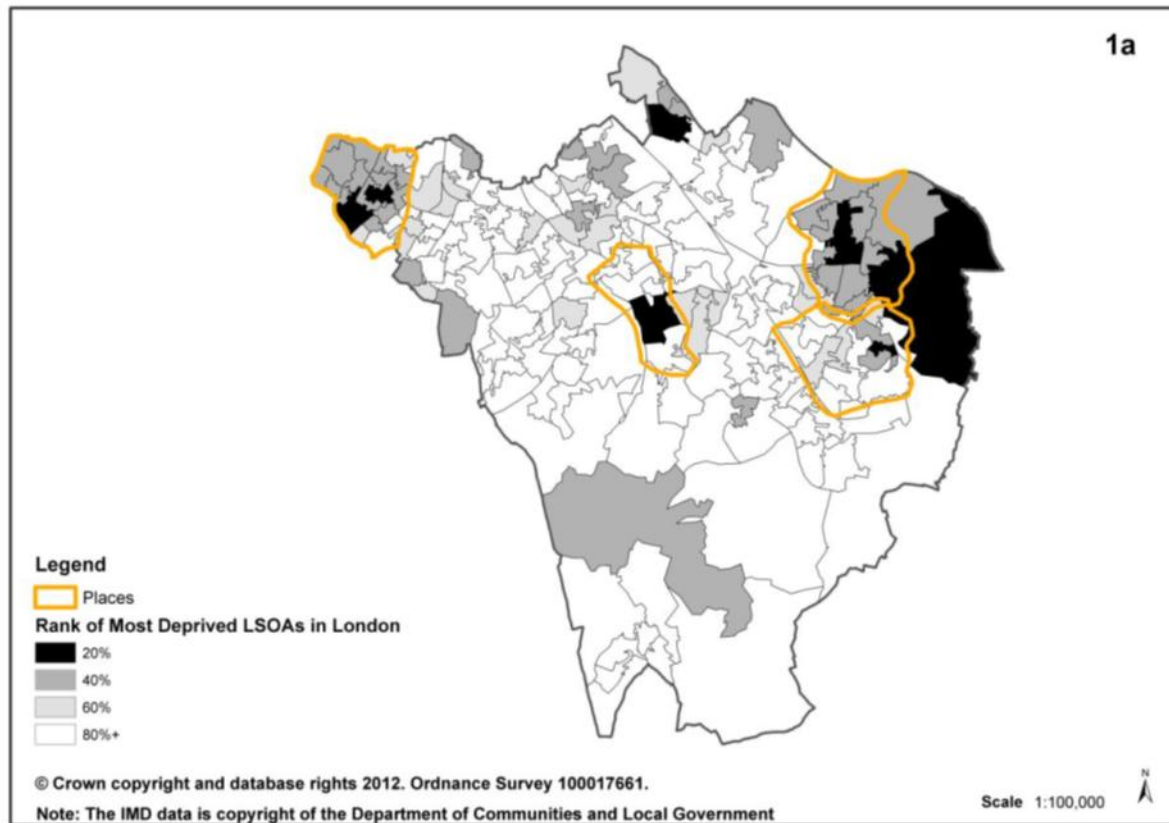
### **Issue 6: Are the policies relating to the Renewal Areas justified, consistent with national policy and The London Plan and will they be effective?**

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#### **1.0 INTRODUCTION**

- 1.1 While addressing this Issue and the questions formulated under it, this submission is aimed to support the case for the designation of the Dylon 2 site as a residential development site with associated publicly accessible open space. The evidence that it does not contribute significantly to the MOL is addressed in the submissions under Issue 10 and that it can contribute to meeting the pressing housing needs not addressed by the submission Local Plan.
- 1.2 The Plan fails to identify the area of Lower Sydenham, as a Renewal Area. This is an area which, together with the neighbouring wards of Bellingham, Whitefoot and Downham (as shown on the map below) in the London Borough of Lewisham, from a socio-economic perspective performs less well against a range of economic, deprivation and housing indicators than LBB averages and as such should be a focus for renewal and improvement.
- 1.3 The Draft Plan is not therefore in conformity with the requirements of Policy 2.6; 2.7 and 2.8 of the London Plan and accordingly fails this requirement.
- 1.4 We contend that the Local Plan should identify the area of Lower Sydenham, as a seventh Renewal Area.
- 1.5 This should be coupled with additional allocations for housing on sustainable, accessible brown field sites close to Lower Sydenham Railway Station.
- 1.6 The Draft Plan is not therefore in conformity with the requirements of Policy 2.6; 2.7 and 2.8 of the London Plan and accordingly fails this requirement.





- 1.7 We contend that the Local Plan should identify the area of Lower Sydenham, as a seventh Renewal Area.
- 1.8 This should be coupled with additional allocations for housing on sustainable, accessible brown field sites close to Lower Sydenham Railway Station and build upon the boost already being injected by the Dylon Phase 1 development now nearing completion.
- 1.9 The Bromley Joint Strategic Needs Assessment of 2014 identified problems in the Copers Cope Ward of:
- housing overcrowding
  - low life expectancy
  - low educational achievement at stage 2
  - mental health problems
  - high rates of landlord repossessions
  - binge drinking
  - a large ethnic population
- 1.10 The following extracts from the Joint Strategic Needs Assessment for the Ward confirm the following:

*"Summary of Key Issues*

*"Copers Cope is located in the northern part of the borough bordering Lewisham. This is a densely populated area with average deprivation levels. Copers Cope has the highest proportion of working age population in Bromley and is home to a considerable minority ethnic and a non-UK born community."*

*"Although there are few older people living in this area, there is a presence of lone pensioner households. Similarly there is an average proportion of social rented households but high levels of overcrowded housing. There has been a high record of landlord repossession court orders which is a measure of the impact of the economic downturn"*

*"There is variation in educational attainment in pupils attending state funded schools. Achievement of good level of development at age 5 is above average, GCSE attainment is average, whilst attainment at Key stage 2 is poor".*

*"The ward is well served by two train stations and tram link making for easier connections within and out of the borough thus giving it a good score on the Public Transport Accessibility index."*

**2.0 LONDON PLAN - REQUIREMENT FOR BOROUGH TO IDENTIFY AREAS FOR REGENERATION**

- 2.1 London Plan Policy 2.14 advises that Boroughs should look to identify areas for regeneration. As part of the Local Plan preparation: The following highlighted text is indicative of what the renewal of Lower Sydenham including the Dylon2 site can achieve.

***"Boroughs should identify areas for regeneration and set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing.....These plans should resist loss of housing, including affordable housing, in individual regeneration areas unless it is replaced by better quality accommodation, providing at least an equivalent floorspace.***

- 2.2 Lower Sydenham station already affords good connectivity to the wider employment areas of central London within a 30min journey time (see accessibility matrix at Appendix 1). There is the prospect that this will be further enhanced with the potential for the extension of the

Bakerloo services through to Hayes. In their 'Options Assessment Report', published in December 2015, TfL detail a proposed option to provide an extension of the line to Hayes (Kent) and Beckenham Junction. This option consists of a tunnelled extension to Lewisham via Old Kent Road with the line extension, beyond Lewisham, replacing existing national rail services to Hayes. This would lead to the potential for 21 trains per hour operating through Lower Sydenham Station. This will provide an even more convenient, high frequency, rail service into Central London, which has the potential to provide a higher level of service than connectivity to central London and significantly expand the station's role as a Commuter Hub.

2.3 In the supporting text of the London Plan at 2.63 it states:

*"The Mayor is committed to addressing social exclusion across London, and to tackling spatial concentrations of deprivation. Though deprivation occurs in most boroughs, it remains particularly acute and persistent around the eastern side of central London with significant outliers in the inner parts of west and in north London (see Map 2.5). While often neighbourhood based and strongly related to social rented housing, the reasons for social exclusion are complex and tackling them requires locally sensitive action, often across a broad front of economic, education and training, housing, social, transport, security, heritage, development and environmental measures dealt with in other parts of this Plan (including chapters 3 and 7)."*

2.4 We consider that Lower Sydenham is one such area and on the basis of the JNSA assessment a deserving candidate.

2.5 The Borough Plan embraces the London Plan concept and arguably takes it further by identifying 6 so called "Renewal Areas" however there is very little mention of the need for housing in these areas.

2.6 The Local Plan suggests (rightly) that the areas highlighted on the London Plan map do not take account of the picture outside of these tightly drawn electoral districts (which generally are artificial boundaries not reflecting the totality of need) or of the changes taking place in areas over time. Additionally, the areas on the map do not include areas where the Council and partner organisations and stakeholders have historically and are currently seeking to address renewal issues, notably additional areas within "Crystal Palace, Penge & Anerley" and the Cray Valley as well as parts of Mottingham.

2.6 The issues affecting Lower Sydenham, are partly recognised in the Council's Joint Strategic Needs Assessment, as set out above: albeit the degree and extent of deprivation in Lower Sydenham is to a degree masked by other parts of the Copers Cope ward which are relatively affluent and in places highly desirable.

2.7 Lower Sydenham is a neglected area with a poor self-image and should be a focus for renewal regeneration inward investment and improvement rather than left unsupported.

2.8 If inroads can be made in Lower Sydenham this will hopefully migrate and have a positive knock on and competitive effect and encourage others to invest in the worst affected areas of Lower Sydenham and the adjoining area of Lewisham as regeneration including the provision of much needed new housing within Lower Sydenham has the potential to help relieve the pressures in and provide a model for regeneration in the adjoining Bellingham Whitefoot and Downham Wards to the north.



- 2.9 Access to the expansive neighbourhood industrial estates fails to meet modern day needs and which many parts of these in decay. Change is possible but only with the right encouragement. A positive attitude to regenerative new development on brown field sites additional allocations and a positive planning framework is what is needed.
- 2.10 To the north the former gas works at Bell Green has been remediated and is now a thriving business and retail park
- 2.11 Some environmental improvements have been achieved with the Pool River Initiative (in which the former Mayor took a personal interest and made a splash). This is however, still a work in progress and identification as a renewal area and designation of Dylon2 site for housing and Urban Open Space would provide for environmental and riverside enhancements which accessible public space including children's play-space and adult's outdoor gym planned. However, such remediation, environmental improvements and riverside works need to be funded and will not occur without allocation of the site for housing development of the brownfield land forming part of the area.



- 2.12 Dylon 2, if allocated as part of a Renewal Area, would be a continuation of the renewal instigated by the Phase 1 development. It would provide much needed homes including 35% affordable as well as generating significant economic benefits As set out in the attached Appendix 2 - Economic and Regeneration Benefits Assessment for the Dylon 2 development.
- 2.13 Lower Sydenham was a traditional working class industrial area. As the older labour-intensive industries have faded opportunities for regeneration and change have arisen and this together with the extant deprivation should be recognised through the designation as a Renewal Area in line with London Plan policy.
- 2.14 As regards the greatest recurring expenses for most Londoners (housing and travel) housing in Lower Sydenham tends to be less expensive and hence more accessible. Housing cost in Bromley Town Centre, Beckenham and Orpington and other parts of the borough is increasingly out of reach. Lower Sydenham is in travel zone 4: more affordable than from Bromley Town Centre.

- 2.15 The area is one where cross border co-operation between neighbouring boroughs with common problems ought to be happening in line with the NPPF and the London Plan. In many ways Lewisham's problems and those of Lower Sydenham are shared problems and the identification of Lower Sydenham as a Renewal Area would mirror the efforts of Lewisham and the GLA to bring about social economic and environmental enhancements in areas which have been historically neglected. It is an area where additional good quality housing can and should be built and one where a positive planning framework is desperately needed.
- 2.16 In a Bromley context Lower Sydenham shares many of the characteristics of the Council's other Renewal Areas and Policy recognition should be afforded to it in order to encourage inward investment and provide much boost house building including affordable homes for local people.
- 2.17 Deprivation impacts on residents' life chances and this has a depressing impact on local economies. In lower Sydenham poverty and housing problems do not stop at the borough boundary. Bromley is not planning for housing its OAN and more particularly is not planning for the objectively assessed affordable housing need having only delivered 28 units in the past four years.
- 2.18 In short, Lower Sydenham is an area which needs renewal and such renewal will assist in addressing the current deprivations identified as referred to above. The Dylon 1 development is a start and can be continued on the Dylon 2 site with benefits for landscape environment homes and jobs.
- 2.18 Additional large sites such as Dylon 2 have to be released and the designation of Lower Sydenham as a Renewal Area and the immediate review of the MOL (not some promise of a review as was the case in 2006) is not an option but a necessity. Failure to act can only lead to continued housing hardship and the related social environmental and health problems (housing overcrowding mental health anti-social behaviour and low life expectancy).

### **3.0 CONCLUSION**

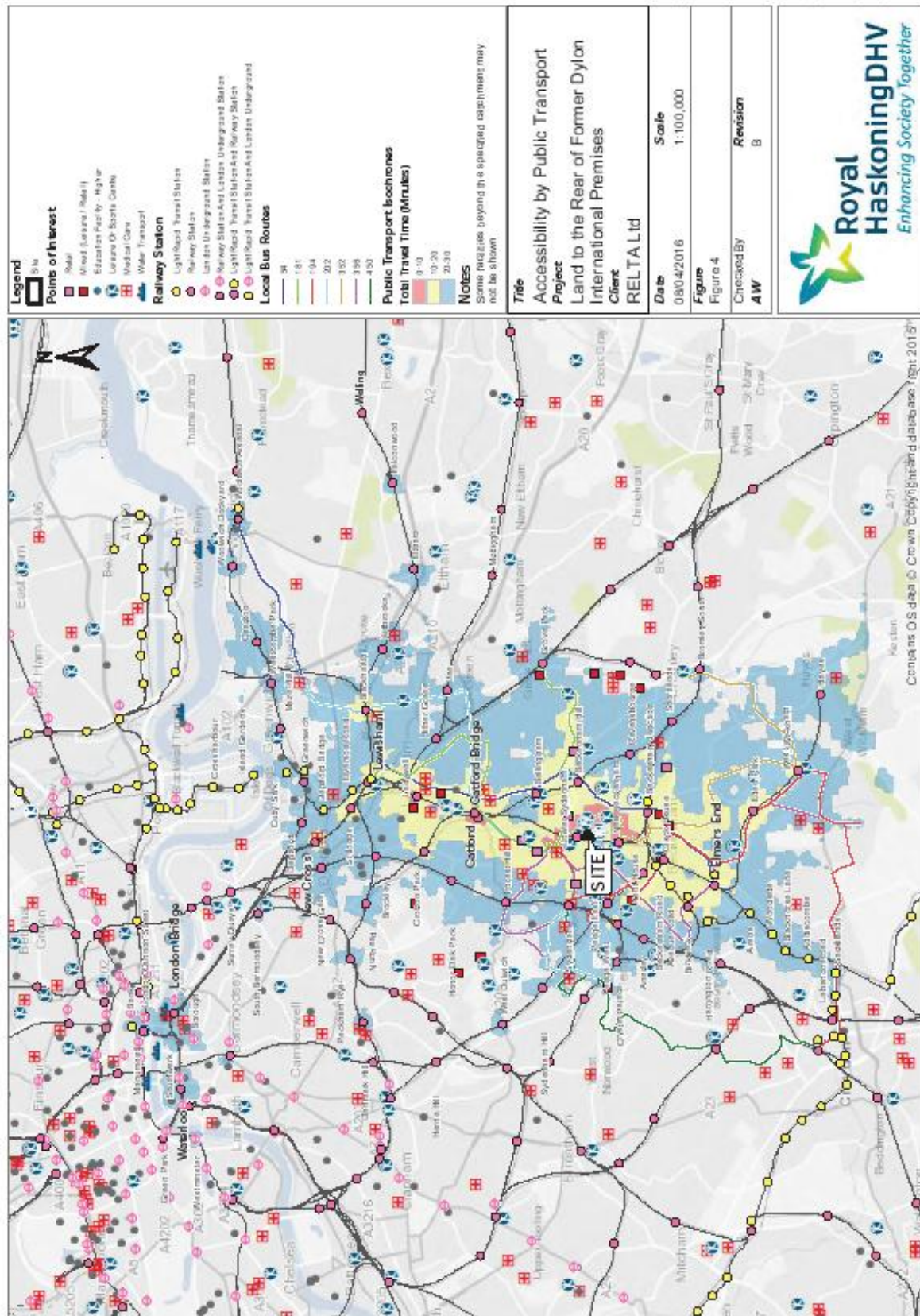
- 3.1 We therefore invite the Inspector to recommend that Lower Sydenham be identified in the Local Plan as a Renewal Area and that the Dylon 2 site should be allocated as part of that for a Housing and Urban Open Space development.
- 3.2 As well as the Council's overall objectives for the Renewal Areas specific objectives for Lower Sydenham are suggested as follows:

***Draft Policy xx The Lower Sydenham Renewal Area***

***To encourage cross border working with the London Borough of Lewisham in delivering high quality environments landscape and townscape enhancements provision, including the continuation of the Strategic cross border initiative for the enhancement and recreational use of the River Pool and relieving housing overcrowding through significant additional "tenure blind" housing.***

***Housing at appropriate densities in close proximity to the Lower Sydenham Railway Station and securing the remediation of land contaminated through well designed housing and other development will be a particular objective of this Renewal Area***

- 3.3 We trust this is helpful.



Path: C:\Users\30408\Desktop\Lower Sydenham Fig 4 Public Transport.mxd





Nathaniel Lichfield  
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Planning. Design. Economics.



Dylon Phase 2, Lower Sydenham

## **Economic and Regeneration Benefits Assessment**

Relta Limited & Dylon 2 Limited

January 2017



**Nathaniel Lichfield  
& Partners**

Planning. Design. Economics.

**Dylon Phase 2, Lower Sydenham**

**Economics and Regeneration Benefits  
Assessment**

Relta Limited & Dylon 2 Limited

January 2017

14473/03/SB/CGJ/LOC/TW

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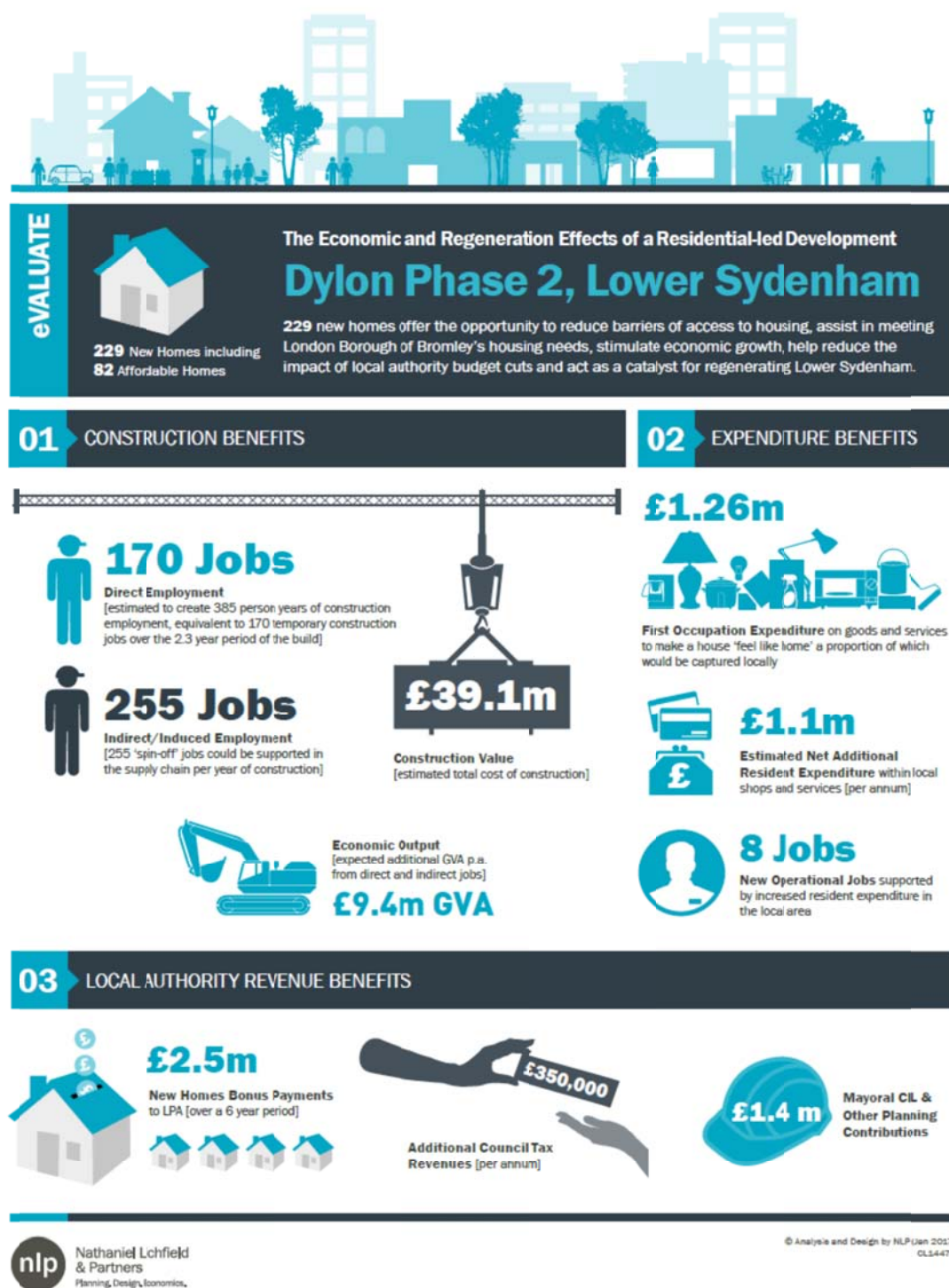
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## Executive Summary

This report provides an assessment of the economic effects of the proposed residential-led development Dylon Phase 2, Lower Sydenham, comprising 229 dwellings and a landscaped park.

The headline economic benefits of the proposal are summarised below:



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1.0

## Introduction

1.1

This report has been prepared by Nathaniel Lichfield & Partners (“NLP”) on behalf of Relta Limited & Dylon 2 Limited. It sets out the potential socio-economic and regeneration effects of the proposed residential scheme, referred to herewith as Dylon Phase 2, within the London Borough of Bromley (LBB). The cumulative benefits of Dylon Phase 1 and Phase 2 are also presented.

1.2

The proposed development is the second phase of the redevelopment of the former Dylon International Works site designed by leading architect Ian Ritchie. The design quality of the Phase 1 scheme which is now well advanced in construction was recognised by successive planning inspectors and the local planning authority.

## Site Context

1.3

The proposal site is part of the former Dylon International headquarters on Station Approach, Worsley Bridge Road and is located to the south-east of Lower Sydenham and north of Beckenham District Centre. The site is located in the north of LBB, close to the boundary with the London Borough of Lewisham (LBL). The site is bordered to the west by the railway, which separates it from Sydenham Industrial Estate and the Pool River runs along the eastern perimeter. Access is via Station Approach. The proposal site is identified by a red line in Figure 1.1 below, with Dylon Phase 1 demarcated by a blue line.

Figure 1.1 Dylon Phase 2 Site Context Plan



Source: Ian Ritchie Architects

## Consented and Proposed Development

- 1.4 Planning permission for Dylon Phase 1, comprising 223 new dwellings as well as retail floorspace, café and crèche, was granted on appeal in early 2015. Crest Nicholson acquired the site in October 2015, commenced construction and launched the dwellings on the market in July 2016. It is anticipated that scheme will be completed in Summer 2018.
- 1.5 The Phase 2 development proposals comprise 229 residential flats and accessible landscaped open space, incorporating a dedicated play area as well as open gym facilities and seating. Table 1.1 provides an indicative tenure split.

Table 1.1 Dylon Phase 2 Tenure Split

Type of Residential Units	Market	Affordable	Total
1, 2 and 3 bed flats	147 (64%)	82 (36%)	229

Source: Ian Ritchie Architects

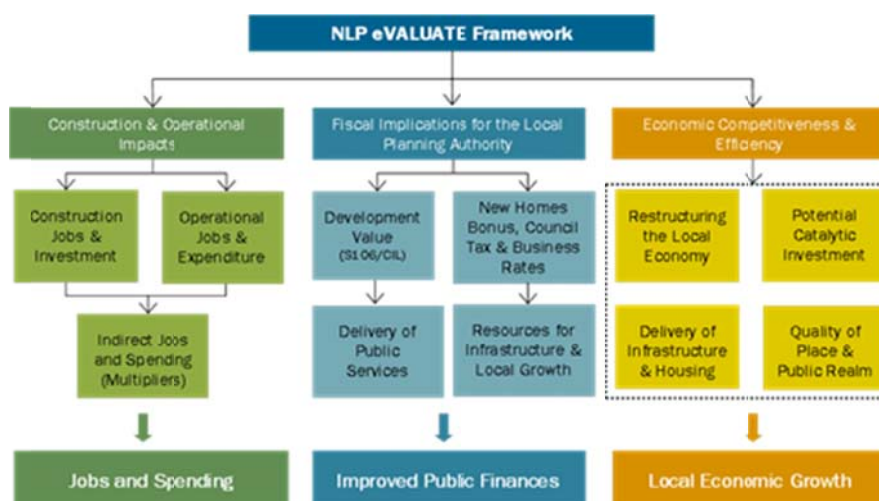
## Purpose of the Report

- 1.6 This report presents the potential socio-economic and regeneration benefits that the proposed residential development could provide within the local impact area on both its own merits and alongside the residential-led mixed-use development, Dylon Phase 1.

## Study Framework

- 1.7 This report draws on the eVALUATE methodology developed by NLP, which provides an analytical framework for assessing the economic benefits arising from new development. This framework, as it relates to the analysis for the proposed development, is shown in Figure 1.2.

Figure 1.2 NLP's eVALUEATE Analytical Framework



Source: NLP analysis

- 1.8 The analysis focuses first on the key quantifiable impacts of the development during the construction phase and upon completion, before considering the wider qualitative effects of the role that new housing developments have in the context of supporting economic growth and regeneration generally.
- 1.9 For residential schemes, the scale and type of economic impacts are typically determined by:
- the scale of capital investment in the scheme which generates employment and economic output during the construction phase;
  - the quantum and type of residential dwellings proposed, and in turn, the socio-economic profile and spending patterns of residents;
  - the location of the development in relation to centres of retail activity and other town centre uses, which capture and benefit from the additional expenditure of residents; and
  - the extent to which the proposed development also provides other fiscal contributions.

## Dylon Phase 2 Appeal

- 1.10 This report is similar in its nature and scope to that prepared for previous planning applications (2015) and the planning appeal (2016) on this site. The methodology and the findings in those Economic and Regeneration Benefits Assessments were accepted by the LBB and the Planning Inspector, the latter finding that “ *the economic benefits that would result from building a project of this scale are considerable*”. (APP/G5180/W/16/3144248, 2 August 2016 decision letter, para 66).
- 1.11 This report adopts the same NLP eVALUEATE Framework methodology and data inputs as our previous (2015) reports, but the socio-economic baseline has been updated where more recent data is available.



## Structure of the Report

1.12

This report is structured as follows:

- Section 2 sets out the socio-economic baseline position;
- Section 3 outlines the potential economic impacts generated during the construction phase of the development and once complete;
- Section 4 examines the fiscal implications of the proposed development;
- Section 5 considers the socio-economic and wider regeneration impacts as well as cumulative impacts;
- Section 6 draws together overall conclusions.



2.0

## Socio-Economic Baseline Position

2.1

This section sets out the socio-economic context for the proposed residential development Dylon Phase 2 identifying key socio-economic and housing trends at the Borough level which are benchmarked against the London context. The local context proximate to the site is highlighted (defined below). This information has been derived from the ONS and other published data sources.

2.2

LBB is London's largest Borough in terms of land area. It shares a boundary with nine other local authorities. The Borough's settlements and population are concentrated to the north and around Biggin Hill to the south. The majority of the land to the south of the Borough is designated as Green Belt.

### Local Impact Area

2.3

The local impact area is assumed to be the area most directly affected by the proposed development in terms of socio-economic effects including population change, increased demand for services and facilities, resident expenditure and the local housing market. The proposed development lies within LBB, however, the site lies close to the boundary with LBL (to the north of the site) and taking the spatial distribution of amenities, services and infrastructure in the locality into consideration, it can be expected that a portion of the socio-economic effects will be felt within both Boroughs.

2.4

On this basis, a local impact area has been defined for the purposes of this assessment as set out in Figure 2.1. It includes eight 2011 Census Output Areas which are the lowest geographical areas at which Census data is available and are considered to provide the most appropriate statistical fit, taking the characteristics of the local area into account. The local impact area is referred to herewith as 'Lower Sydenham'. It should be noted that the most recent data available at this level and the data referred to in this section relates to 2011 Census.

### Population

2.5

According to the 2011 Census, the population of Lower Sydenham local impact area amounted to 2,240 people.

2.6

According to the ONS mid-year estimates, the total resident population of LBB was 324,900 in 2015. Over the 10 year period 2005-2015, the population increased by 8.5%.<sup>1</sup> Over the same timeframe, London's population growth was nearly twice as high at 15.4%.

2.7

The 2014 based Sub-National Population Projections suggest that the population of LBB is set to rise by approximately 87,300 by 2039,<sup>2</sup> representing

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<sup>1</sup> ONS mid-year population estimates, various years.

<sup>2</sup> ONS 2014-based Subnational Population Projections (2016).

a further 27% increase. Much of the growth in population is expected to be associated with older resident groups with a decline in the proportion of young children and working age adults expected.

## Economy and Labour Market

2.8 LBB performs well across a range of economic indicators and when benchmarked against London averages. The local labour market and economy is characterised by the following factors:

- in 2016, 79% of 16-64 year olds were economically active, consistent with the figure for London (78%)<sup>3</sup>;
- residents are well educated: 47% of working-age residents hold a NVQ4 qualification and just 4% have no qualifications, under half the proportion across London (9%)<sup>4</sup>;
- over half of people in employment (59%) are in managerial, professional or technical occupations,<sup>5</sup> while 13% are in operative or elementary occupations<sup>6</sup>;
- median resident earnings in LBB are £716 per week.<sup>7</sup> This is 13% higher than the London average of £632;
- workplace earnings at £564 are 16% lower than the London earnings of £671.<sup>8</sup> This indicates that a portion of LBB economically active residents travel outside the Borough to access higher paid employment;
- the largest sectors are whole and retail trade and human health and social work activities, which account for 18% and 16% of employee jobs respectively, followed by education and administrative and support service activities<sup>9</sup>; and
- economic activity is concentrated around Bromley Town Centre and the Borough's main centres. The main sources of employment outside of the town centres are in business areas such as St Mary Cray and Lower Sydenham.

2.9 The local labour market and economy in LBL is characterised as follows:

- in 2016, 80% of 16-64 year olds were economically active, a comparable proportion to LBB;
- over half (53%) of the resident population aged between 16-64 years hold an NVQ4 qualification, though 6% hold no qualifications;

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<sup>3</sup> ONS Annual Population Survey (2016).

<sup>4</sup> Working-age population includes those aged 16-64; ONS Annual Population Survey (2016).

<sup>5</sup> Includes those aged 16+; SOC 2010 Major Group 1-3; ONS Annual Population Survey (2016)

<sup>6</sup> Includes those aged 16+; SOC 2010 Major Group 8-9; ONS Annual Population Survey (2016).

<sup>7</sup> ONS annual survey of hours and earnings - resident analysis (2015).

<sup>8</sup> ONS annual survey of hours and earnings - workplace analysis (2016).

<sup>9</sup> ONS Business Register and Employment Survey : open access (2015)

- 57% of people in employment occupy managerial, professional or technical occupations<sup>10</sup> while 14% of people have operative or elementary occupations;<sup>11</sup>
- median resident earnings amount to £621 per week, this is less than the LBB and London averages;
- workplace earnings at £600 significantly lower than the LBB and London averages; there is less variation between resident and workplace earnings than in LBB;
- the largest sectors are human health and social work, and education which account for 20% and 17% of employee jobs respectively, followed by retail and wholesale;
- economic activity is concentrated around Lewisham Town Centre, Catford Town Centre, Deptford and the Borough's smaller centres.

2.10

The characteristics of the local economy and labour market in Lower Sydenham local impact area deviate from Borough-wide trends:

- the economic activity rate among 16-74 year olds was 74% in 2011;
- residents of the Lower Sydenham local impact area are significantly less well qualified than the LBB average; 17% of those aged 16 and over hold no qualifications and just a third of people hold NVQ level 4 qualifications;
- similarly, residents occupy lower tier occupations, 45% of 16-74 year olds hold managerial, profession and associate and technical roles; 21% occupy caring, leisure, service, sales and customer service occupations<sup>12</sup> and 11% are plant and machine operatives and occupy elementary occupations; and
- Lower Sydenham Industrial Estate which falls within the local impact area provides a locally significant industrial site and significant level of employment.

## Connectivity and Commuting

2.11

LBB is well connected to central London and the wider south east region by both road and rail. The M25 runs to the east of Orpington to the south of Biggin Hill. A number of A-roads run through the area including the A21 which links Bromley Town Centre to the M25.

2.12

LBB does not currently benefit from a London Underground station though the recently opened London Overground extension serves the north-west of the Borough with links to Croydon, East London and the consequently the London Underground network. Transport for London (TfL) is currently considering a proposal to extend the Bakerloo line south from Elephant and Castle through Southwark into Lewisham and via Old Kent Road. TfL's Business Plan

<sup>10</sup> Includes those aged 16+; SOC 2010 Major Group 1-3; ONS Annual Population Survey 2016.

<sup>11</sup> Includes those aged 16+; SOC 2010 Major Group 8-9; ONS Annual Population Survey 2016 .

<sup>12</sup> Soc 2010 major group 6-7

indicates that the extension to Lewisham could be completed by 2028/29<sup>13</sup>. It is proposed that Lower Sydenham is a destination on the subsequent phase of this extended route.<sup>14</sup>

- 2.13 There are also 26 railway stations providing links with central London and Kent. Lower Sydenham Station, located just to the north of the application site is operated by Southeastern and provides services to Hayes in Kent, London Charing Cross and London Cannon Street. Journey time from Lower Sydenham station into central London is approximately 16- 29 minutes.<sup>15</sup>
- 2.14 While the site only achieves a PTAL 2 rating, the Accessibility Modelling undertaken as part of the Transport Assessment (TA) accompanying the application demonstrates that the site's catchment area by non-car modes of transport is significant, with key education, health, and leisure and retail services accessible within a short journey time.
- 2.15 Census 2011 origin-destination data provides an insight into the commuting patterns of LBB residents. Analysis of the data indicates that LBB has a self-containment rate of 34%, meaning that 34% of residents who are in employment also work within the Borough. Almost 45% of employed LBB residents travel to Inner London for work due to the proximity and connection to the city.
- 2.16 Origin-destination data is not available at Output Area for Lower Sydenham, however, Middle Super Output Areas can be used (including Bromley 006, Lewisham 034 and 035). Resident commuting patterns vary from the Borough-wide average. In total, 69% of the employed people in this area travel to other Boroughs in Inner London for work. This is perhaps owing to the relative proximity of this area to Inner London compared to areas to the south of LBB like Biggin Hill for example, combined with the location of Lower Sydenham rail station. Despite this propensity to commute out to Inner London, 15% of LBB's employed residents work in LBB and 19% of LBL's employed residents work in LBL.
- 2.17 Conversely, origin-destination data shows that 50% of people who work in Bromley also live within the Borough while 39% of people who work in LBL also live in LBL.

## Deprivation

- 2.18 Figure 2.2 below shows how Lower Super Output Areas (LSOAs) within LBB and LBL rank in terms of the Indices of Multiple Deprivation (IMD). LBB is characterised by generally low levels of deprivation, and is ranked as 220 out of 326 local authorities in England overall, which places it within the 33% least deprived areas in the country.<sup>16</sup> However, this Borough-wide profile masks significant spatial variation within LBB, with income deprivation and

<sup>13</sup> <http://www.southwarknews.co.uk/news/new-draft-3-1bn-bakerloo-line-extension-plans-will-go-public-january/>

<sup>14</sup> The Transport Assessment accompanying this application considers this in further detail.

<sup>15</sup> As set out in Table 5.1.

<sup>16</sup> As measured by the Indices of Multiple Deprivation 2015.

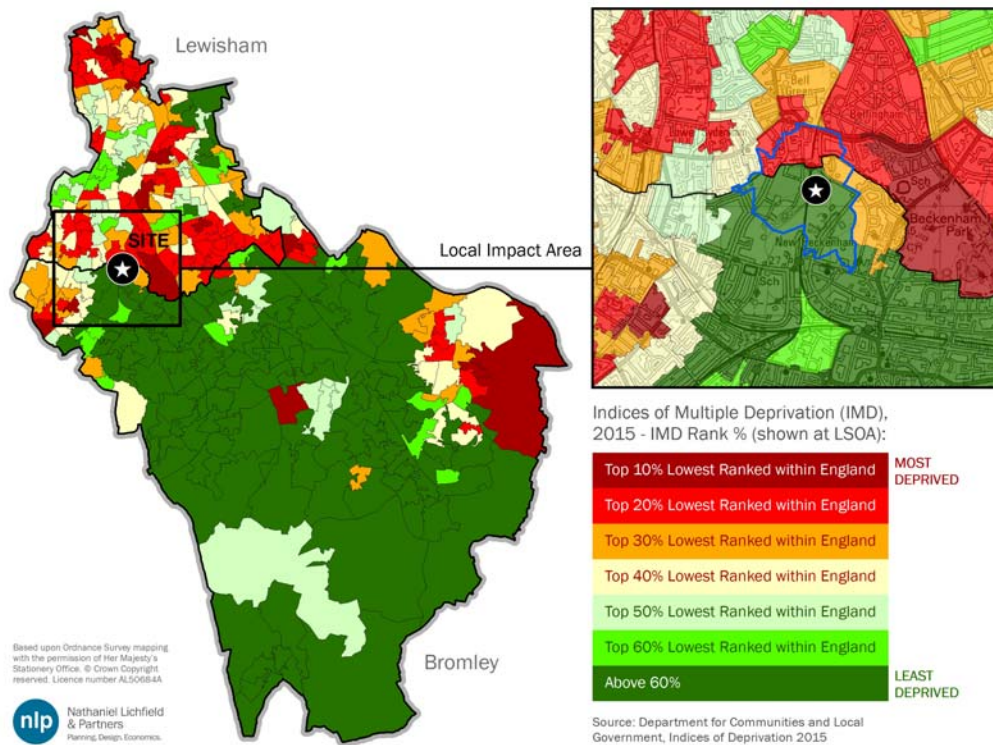
worklessness remaining entrenched in pockets of deprivation across the Borough. Against measures of income scale and employment scale, LBB ranks in the top 25% most deprived local authorities nationally (in terms of rank of income scale<sup>17</sup>).

- 2.19 As is apparent from Figure 2.1, LBL records significant levels of deprivation, overall it ranks as the 26<sup>th</sup> most deprived local authority nationally placing it within the top 10% most deprived areas in the country. The Borough ranks in the top 10% most deprived local authorities nationally against measures of income scale and 11% against employment scale. The stark contrast between deprivation in LBL and LBB broadly aligns with the Borough boundaries; however, areas of deprivation do cross the Borough boundary in the Sydenham area where residents are relatively more deprived than the majority of LBB residents and experience deprivation which corresponds with LBL residents.
- 2.20 The Lower Sydenham local impact area demonstrates this, the proposal site lies within an LSOA that ranks low in terms of deprivation factors - this may be due to the limited amount of residential development in the locality and the presence of other land uses including Sydenham Industrial Estate. However, this may not accurately portray the characteristics of the area, particularly given a number of LSOAs adjacent to the application site, within the Lower Sydenham local impact area (within Bellingham ward) are among the most deprived 10% in England.
- 2.21 To address acute deprivation, the Lewisham adopted Core Strategy identifies a 'Local Regeneration Area' focusing on the wards of Bellingham, Downham and Whitefoot (to the north east of the application site).

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<sup>17</sup> Income Scale is the number of people who are income deprived; Employment Scale is the number of people who are employment deprived.

Figure 2.1 London Borough of Bromley and London Borough of Lewisham IMD, 2015



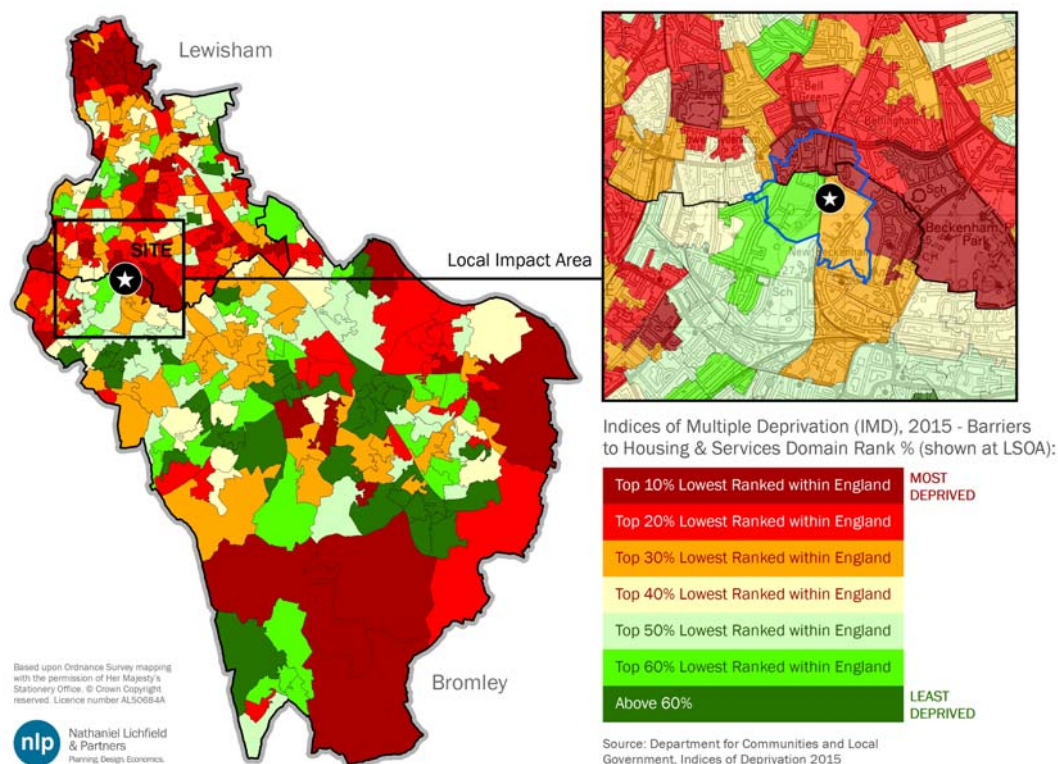
Source: CLG Indices of Deprivation 2015 / NLP analysis

2.22

Figure 2.2 shows how Lower Super Output Areas (LSOAs) within LBB and LBL rank in terms of barriers to housing and services. It demonstrates that a number of LSOAs across LBB rank within the top 20% deprived areas nationally against these parameters. Similarly, significant barriers exist within areas to the south of LBL.



Figure 2.2 London Borough of Bromley and London Borough of Lewisham Barriers to Housing and Services, 2015



Source: CLG Indices of Deprivation 2015/NLP analysis

- 2.23 The 2011 Census also provides data to classify households by four dimensions of deprivation.<sup>18</sup> A household is deprived in a dimension if a member of the household is unemployed, uneducated, sick or disabled or the accommodation is overcrowded, is in a shared dwelling or has no central heating. The data shows that almost 50% of households in the LSOAs within which the application site lies are classified as being deprived in at least one of these measures, while the equivalent proportion for two of the immediately adjoining LSOAs is more than 70%.
- 2.24 The Council's Joint Strategic Needs Assessment (JSNA) (2014) provides ward profiles which take account of a range of indicators including economic issues, the quality of the local environment and of housing, and connections to wider society.<sup>19</sup> The proposed development falls within Copers Cope ward and the ward profile is included in Appendix 1.
- 2.25 The ward profile identifies Copers Cope as having the highest proportion of working age population in LBB, average proportion of social rented households but high levels of overcrowded housing, an economically active working age population, highly qualified residents, low proportion of routine and semi-routine workers and good connectivity. On this basis, the data set out in this

<sup>18</sup> Census 2011, Households by deprivation dimensions.

<sup>19</sup> Bromley Clinical Commissioning Group, Bromley Joint Strategic Needs Assessment 2014. It is noted that a JSNA was published in 2015; however this does not include ward profiles.

profile corroborates the findings of the analysis contained in this assessment albeit at a wider geographical scale (ward level).

- 2.26 One of the key housing challenges facing LBB is the growing gap between house prices and income, which is generating significant affordability problems and keeping many local residents from being able to access open market housing. The median house price in LBB in 2015 was £377,000, exceeding the national average (£212,000) significantly. On this basis, LBB ranked in the top 12% in terms of average median house price nationally and also exceeded the average in neighbouring Boroughs of Lewisham, Greenwich, Bexley and Croydon. During the period 2000 to 2015, house prices in LBB rose by 179%, which was greater than the trend seen across England (159%) over the same period. In comparison, median house prices in LBL were £360,000 in 2015. Between 2000 and 2015, the Borough's average house price increased by 260%, exceeding growth rates in LBB (albeit from a lower base).
- 2.27 Affordability ratios assess the relationship between lower quartile house prices and lower quartile earnings. Based on Department for Communities and Local Government data, the affordability ratio for LBB was 12.98 in 2015, which equates to a 78% increase since 2000. In contrast, the affordability ratio in England was 7.02. Using this measure, houses are less affordable than adjoining Boroughs Lewisham, Greenwich, Bexley and Croydon. In this context, Bromley ranks as 39<sup>th</sup> on the national rankings of affordability, placing it within the top 12% local authorities nationally. This indicates the affordability of housing is an increasingly more serious issue for the population in LBB than elsewhere. Affordability is also a key issue in LBL; in 2015 the affordability ratio was 12.36, which equates to a 167% increase since 2000.
- 2.28 According to the 2011 Census, at Borough level, 71.7% of all households in LBB were owner-occupied, exceeding local, regional and national averages. For example, owner-occupiers only constitute 31.3% of households in Southwark, 52.7% across South-East London and 64.2% nationally. Owner-occupation in LBL is substantially lower than in LBB and accounts for 43.6% of all households.<sup>20</sup>
- 2.29 Just over one third (33.4%) of owner-occupier households in LBB were owned outright, typically these owners are less inclined to move house and as a result there is less churn and opportunities for new households to locate in existing housing stock. Just 14.9% of households in LBL own their houses outright.<sup>21</sup> Conversely, this can lead to a transient population that are less inclined to create ties to their neighbourhood.
- 2.30 The proportion of social or affordable rented only account for 14.1% of all households in LBB which is significantly lower than the equivalent proportion in LBL (31.1%), South East London (27.7%), London overall (24.1%) and England (17.7%). Consequently, the South East London SHMA (2014)

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<sup>20</sup> South East London Housing Partnership, South East London Strategic Housing Market Assessment, June 2014, Table 3.3 Tenure of households 2011, by borough.

<sup>21</sup> South East London Housing Partnership, South East London Strategic Housing Market Assessment, June 2014, Table 3.3 Tenure of households 2011, by borough.

identifies net annual affordable housing need in LBB of 1,404 dwellings and 1,144 dwellings in LBL which are higher than the requirement in Bexley, Greenwich and Southwark.<sup>22</sup>

- 2.31 Private renting in LBB accounts for 14.2% of all households. This is lower than the South-East London (19.7%) and London average (26.4%).<sup>23</sup> As indicated previously, barriers to housing exist in parts of LBB; this may be related to the relatively poor provision of social rented and private rented properties that meet the housing needs of those unable to meet their own needs and newly forming households. The proportion of private renting in LBL broadly equates to the London average (25%) though this is unsurprising considering the relatively low proportion of owner occupation (noted above).
- 2.32 According to the Council JSNA (2015), the number of households in temporary accommodation has almost tripled since 2011, increasing from 427 households in 2010/11 to 1,051 in 2015.<sup>24</sup> LBB's temporary accommodation needs are increasingly being met outside the Borough. The JSNA states:
- the demand for, and supply of housing that is affordable have both been severely impacted by the current housing market and welfare reform, resulting in increasing difficulty in securing prevention solutions and accessing the private rented sector for low-income and benefit dependent households. As a result the number of homeless households in temporary accommodation year on year is increasing with many families being placed outside of the borough boundaries.*<sup>25</sup>

## Socio-economic Groups

- 2.33 A guide to the characteristics and mix of different communities can be secured from Experian's Mosaic dataset. This draws upon a range of datasets to build a profile of any local population based on a series of person-type, household types and group typologies. The data is not specific to individuals, but presents a picture of socio-economic and lifestyle characteristics of a local population, mapped to postcode sectors.
- 2.34 Analysis of demographic and socio-economic data for LBB and LBL suggests that the community surrounding the site is already relatively polarised in terms of population groups. This is substantiated by IMD data (Figure 2.2) which illustrates that neighbourhoods demonstrating high levels of deprivation are contiguous with areas that in contrast suffer very low levels of deprivation.
- 2.35 Figure 2.3 below uses the Mosaic data to segment households across the Boroughs of Bromley and Lewisham, highlighting the area proximate to the application site into distinct groups of population, each sharing similar demographic and lifestyle characteristics.

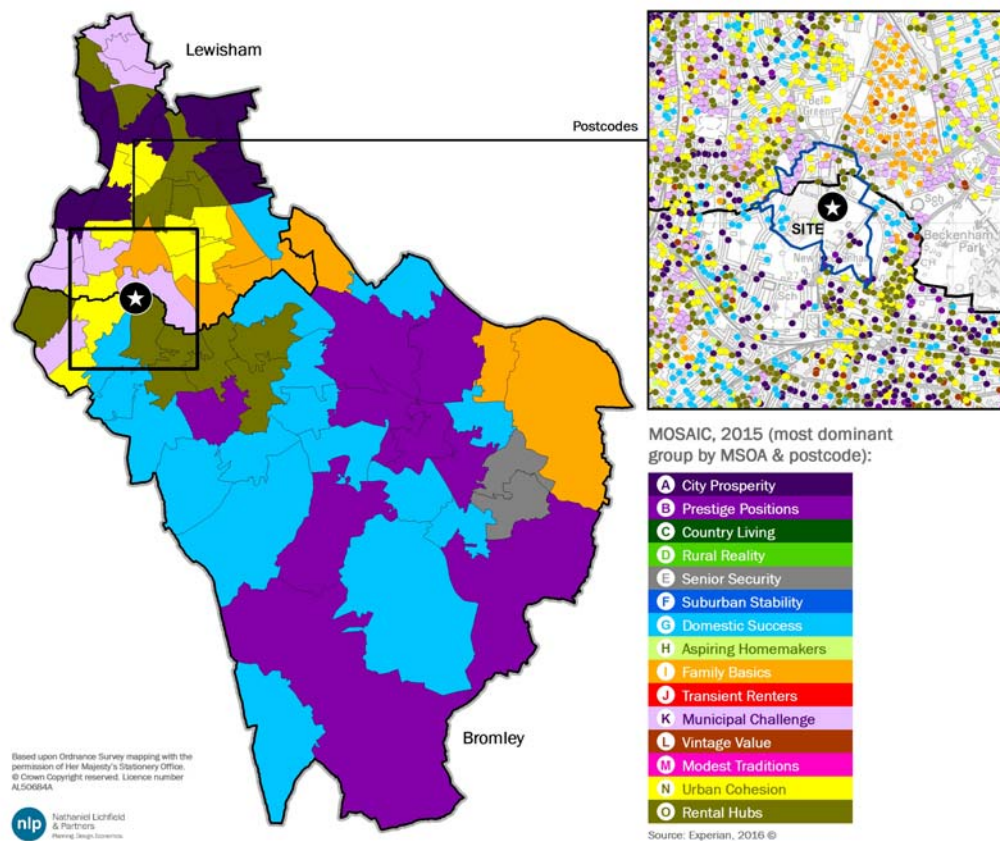
<sup>22</sup> South East London Housing Partnership, South East London Strategic Housing Market Assessment, June 2014, Table 6.10  
Calculation of the need for affordable housing: borough-level outputs.

<sup>23</sup> South East London Housing Partnership, South East London Strategic Housing Market Assessment, June 2014, Table 3.3  
Tenure of households 2011, by borough.

<sup>24</sup> Bromley Joint Strategic Needs Assessment 2015, Table 4.2.

<sup>25</sup> Bromley Joint Strategic Needs Assessment 2015, page 153.

Figure 2.3 Demographic Characteristics of Lower Sydenham, LBB and LBL



Source: Mosaic, Experian 2015; NLP analysis

2.36 The spatial distribution of demographic groups presented in Figure 2.3 shows that the most prevalent demographic groups in LBB include Group G Domestic Success (29%) and Group B Prestige Positions (18%) – groups characterised by well-qualified, high earning professionals that live in high quality housing. The most prevalent demographic groups in LBL are Group K Municipal Challenge (22%) and Group O Rental Hubs (22%) and Group N Urban Cohesion (20%).

2.37 'Prestige positions' and 'domestic success' are concentrated in area to the south of LBB which is rural in nature while 'family basics' tend to be clustered within the main settlements. 'Municipal challenge' households are clustered around Sydenham and north of Deptford. The Lower Sydenham local impact area is more diverse and comprises a mix of 'rental hubs', 'urban cohesion', 'municipal challenge' and 'domestic success' groups as described below:

- Group O – Rental Hub residents include young professionals progressing in their careers, self-starting young renters, singles renting affordable private flats and students;
- Group N – Urban Cohesion comprises established older households in diverse neighbourhoods, families with good incomes in multi-cultural urban communities and large extended families;

- Group K – Municipal Challenge residents include low income workers, singles, multi-cultural households that live in social accommodation that is often overcrowded.

2.38 On this basis, the Lower Sydenham local impact area contains a mixed community that is characterised by a broader range of socio-economic groups than the LBB average and more akin to the LBL community to the north. It also has an over-representation of groups likely to occupy social and affordable housing accommodation.

## Summary

2.39 The analysis presented in this section indicates that from a socio-economic perspective the existing residents of the Lower Sydenham local impact area perform less well against a range of economic, deprivation and housing indicators than LBB averages and is more akin to LBL.

2.40 The Lower Sydenham local impact area is distinguished by the following:

- an economic activity rate of 74% among 16-74 year olds;
- a less well qualified labour force: 17% of the labour force hold no formal qualification while just one third of people have attained a NVQ level 4 qualification; and
- only 45% of people in employment occupy top tier positions and relatively more people occupy lower tier caring, leisure, service, sales and customer service occupations and plant and machine operatives and occupy elementary occupations.

2.41 In contrast, LBB's residents are relatively well qualified, occupy top-tier occupations and are above average earners.

2.42 In terms of deprivation and social-mix, households in the Lower Sydenham local impact area are relatively more deprived than the rest of LBB and are more reflective of the communities in adjoining LBL. The stark contrast between deprivation in LBL and LBB broadly aligns with the Borough boundaries; however, areas of deprivation do cross the Borough boundary in the Sydenham area where residents are relatively more deprived than the majority of LBB residents and experience deprivation which corresponds with LBL residents.

2.43 Major social groups in LBB include prestige positions and domestic success while municipal challenge, urban cohesion and city prosperity dominate in LBL. The community surrounding the site is relatively polarised in terms of population groups. The area comprises rental hubs, urban cohesion, municipal challenge households which are generally less successful and are more likely to experience deprivation and social barriers than the wider population.

2.44 This contrast is also evident in terms of access to housing and services; the local impact area falls within the top 20% most deprived nationally. This can in part be attributed to the following factors:

- median house prices in LBB are £377,000, which exceeds local, regional and national averages (£360,000 in LBL);
- an average affordability ratio in LBB of 12.98 in 2015 (12.36 in LBL);
- low proportion of affordable housing stock alongside high levels of affordable housing need – 1,404 dwellings in LBB (there is a greater proportion of affordable housing in LBL (31%) however, need is also high (1,144)),<sup>26</sup> and
- there is a high proportion of owner-occupation (72%) in LBB, in contrast owner-occupation in LBL is low comparatively (44%).

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<sup>26</sup> South East London Housing Partnership, South East London Strategic Housing Market Assessment, June 2014.



3.0

## Economic Benefits

3.1

This section considers the economic impacts arising from construction of the proposed Dylon Phase 2 scheme with the particular benefits accruing to the local area highlighted. These benefits include the additional resident expenditure and local employment that would be supported once the residential scheme is fully occupied.

### Construction Effects

#### Direct Employment

3.2

It is anticipated that the total construction cost of the proposed housing scheme will amount to **£39.1 million**. This construction cost can be used to approximate the amount of construction employment to be generated by the housing scheme. ONS Annual Business Survey data indicates that the average ratio of expenditure (i.e. on materials, goods and services) to jobs in the construction industry in 2014 was £100,970.<sup>27</sup>

3.3

Applying this ratio to the estimated construction cost outlined above implies the development would be expected to create **385 person-years of construction employment** over the duration of the build period. If the site were built-out over 2.3 years, this would support **170 temporary construction jobs** per annum on average during the construction phase, or **40 FTE construction jobs**.<sup>28</sup>

3.4

Following the uplift in construction activity in London in recent years, it is likely there will now be a supply of local workers with construction skills and businesses which have developed to support/supply the construction activity. The proposed development is also likely to help provide employment opportunities for people seeking employment in the local area.

3.5

Although national and regional construction firms often use their own labour on projects, it is typical that a proportion of the contractors employed will be drawn locally. However, it is difficult to ascertain the likely source of workers to fill these jobs before contracts have been let. Based on previous experience, it is reasonable to expect a proportion of the construction jobs to be taken up by local workers, particularly if measures are in place to raise local skill levels and encourage local recruitment (e.g. apprenticeships).

#### Indirect and Induced Employment

3.6

Housing construction also involves purchases from a range of suppliers who, in turn, purchase from their own suppliers via the supply-chain. The relationship between the initial direct spending and total economic impacts is known as the 'multiplier effect', which demonstrates that an initial investment can have much larger economic benefits as this expenditure is diffused through the economy.

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<sup>27</sup> Annual Business Survey 2014 (2016 release).

<sup>28</sup> Based on HM Treasury assumption that 10 person-years of employment equates to 1 permanent position.

The construction sector is recognised to be a part of the UK economy where there is a particularly high domestic benefit in the supply chain. Research shows the construction sector imported less than 8% of its supply, while the UK car manufacturing sector imported nearly 28%.<sup>29</sup>

- 3.7 It is anticipated that businesses across LBB and within Sydenham Industrial Estate would benefit from trade linkages established during the construction phase of the proposed development. As a result, further indirect jobs would be supported in the local area through the suppliers of construction materials and equipment.
- 3.8 In addition, businesses would also be expected to benefit to some extent from temporary growth in expenditure linked to the direct and indirect employment effects of the construction phase. While only a portion of these benefits would be felt in LBB, it would be expected that the local economy would gain a significant temporary boost from the wage spending by workers in local shops, bars and restaurants, and other services and facilities. Such effects are typically referred to as 'induced effects'.
- 3.9 Research undertaken on behalf of the National Housing Federation indicates the construction industry has an indirect and induced employment multiplier of 2.51.<sup>30</sup> Applying this employment multiplier to the 170 direct construction jobs each year derived above indicates an additional **255 indirect and induced jobs** could be supported per year of construction by the proposed development in sectors throughout the UK economy. This is in addition to the 170 direct jobs.

### Economic Output

- 3.10 The construction phase of the development will also make a major contribution to local economic output, as measured by Gross Value Added (GVA).
- 3.11 Based on 2016 Experian data, the construction sector creates an average GVA per Full Time Equivalent (FTE) of £100,665 in London. Applying this to the employment impact of the scheme (as derived above), it is clear that capital spending linked with the proposed scheme could create an additional **£3.9 million of direct GVA** and an additional **£5.5 million of indirect GVA** for each year of construction.<sup>31</sup> This equates to around **£9.4 million GVA in total per annum**. It should be noted that not all of this will be retained locally.

### Resident Expenditure Effects

- 3.12 The proposed residential scheme comprising 229 units offers an opportunity to increase local expenditure. The scales of these benefits are determined by the spending patterns of local residents, and the extent to which new residents of the scheme move into the area from elsewhere.

<sup>29</sup> UK Contractors Group, Construction in the UK Economy: The Benefits of Investment, 2009 (2012 Update).

<sup>30</sup> National Housing Federation, 2013; an employment multiplier of 2.51 implies that for every one direct job generated a further 1.51 indirect and induced jobs are supported in the supply chain.

<sup>31</sup> National Housing Federation, 2013; based on an indirect GVA multiplier of 2.41 which implies for every £1 of economic output there is a further £1.41 of indirect GVA generated.

## First Occupation Expenditure

- 3.13 Recent research suggests that the average homeowner spends approximately £5,500 to make their house 'feel like home'.<sup>32</sup> This money is generally spent on furnishing and decorating a property. This expenditure will generate a range of economic benefits for the local economy by supporting indirect and induced jobs within local businesses.
- 3.14 By applying this average level of one-off spending on household products and services, it is estimated that new residents of the 229 proposed dwellings at Highgrove Farm could generate **£1.26 million of first occupation expenditure**. This injection of resident spending within the local economy will help support local businesses, support **3 jobs** and increase work prospects in the area.

## Gross Additional Expenditure

- 3.15 Analysis of Output Area Classification data indicates that housing areas within the Lower Sydenham area are largely dominated by households within the 'Urbanites' socio-economic classification group. It is anticipated that new residents of the proposed market housing would broadly be in the same type of household group, albeit tenants of the proposed affordable housing element may fall within a different socio-economic classification.
- 3.16 The ONS Family Spending Survey (2015 edition) offers data on household spending by household socio-economic classification. This indicates average spending levels of £519 per week for households in the 'Urbanites' group. Average spending by London households is 16% higher on average indicating an average household spending figure of £602 per week. Average expenditure among the 'Hard Pressed Living' group (i.e. more indicative for the scheme's affordable housing) in London amounts to £435 per week.
- 3.17 Based on these assumptions, it is estimated that residents of the development could generate total gross expenditure of around **£6.5 million per annum**.

## Net Additional Expenditure

- 3.18 It is recognised that not all residents of the proposed development will be 'new' to the local area as some will relocate from elsewhere within the sub-region. National research gives standards on the average distances moved between a head of household's present and previous residential address, which can be used to estimate the proportion of the population of the proposed development that may be 'new' to the local area.<sup>33</sup>
- 3.19 In addition, as indicated in the Council's 'Retail, Office, Industry and Leisure Study' (2012), only a proportion of the gross expenditure by residents of the proposed housing will be retained within LBB. It is anticipated that

<sup>32</sup> Research carried out by OnePoll on behalf of Barratt Homes, August 2014.

<sup>33</sup> DTLR, Survey of English Housing, Tenure by Distance Moved, 2000/01.

approximately 25% of total resident expenditure associated with the new scheme could be retained in the Borough. Leakage of spending from this area can be attributed to the proximity of the application site to the LBL boundary and retail centres in the surrounding areas such as Bell Green, Sydenham, Forest Hill and Croydon. Nevertheless, a portion of spending will be retained within centres in LBB including nearby Beckenham and Bromley Town Centre which, as a London Metropolitan centre has a comprehensive offering, particularly of convenience goods.

- 3.20 Taking the above factors into consideration, it is estimated that total net additional expenditure of **c. £1.1 million** per year on average will be generated by new residents to the area, and be retained within the Borough. This additional expenditure will support the vitality and viability of local businesses, and could encourage other firms to relocate to the local market. It is also estimated that this additional expenditure associated with the proposed housing scheme could generate a further **8 FTE local jobs** in retail, leisure, hospitality and other service sectors.<sup>34</sup>

## Summary

- 3.21 It is estimated that the proposed development could give rise to the following economic benefits:
- a 385 person years of construction employment, equivalent to 170 temporary construction jobs will be directly supported over the 2.3 year build period;
  - b 255 'spin off' jobs could be supported in the supply chain per year of construction;
  - c £9.4 million additional GVA per annum from direct and indirect construction employment;
  - d resident expenditure benefits including £1.26 million in first occupation expenditure and £1.1 million in net additional resident expenditure which could be retained within local shops and service each year; and
  - e resident expenditure will help to support 8 FTE jobs in the local area.

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<sup>34</sup> These are in addition to the additional jobs supported by the first occupation expenditure.

4.0

## Fiscal Implications

4.1

This section considers the benefits delivered by the proposed development that accrue to the local authority. At a time when finances are constrained through the Government's public sector austerity measures, this additional revenue is set to become a significant source of income for local authorities.

### New Homes Bonus

4.2

In 2010, the Government introduced an incentive-based scheme to support delivery of new housing. The New Homes Bonus matches for a six year period the increase in Council Tax income from new homes, or homes brought back into use.<sup>35</sup> Payments are not ring-fenced and therefore allow local authorities to use Bonus payments in the most beneficial way to support their needs. A premium of £350 is payable on affordable housing units.

4.3

The proposed housing scheme at Dylon will deliver 229 new homes at a range of sizes and therefore Council tax bands. Using standard methods of calculation as contained within the CLG New Bonus Calculator, it is estimated that the new development could generate c. £415,000 of New Homes Bonus payments per annum, or **c. £2.5 million over six years** (albeit profiled to reflect the build period for the housing development).

### Council Tax Payments

4.4

This income generated from New Homes Bonus payments would be matched by extra Council Tax payments received by Bromley Borough Council of c. £350,000 per annum in perpetuity, or **c. £2.1 million** over the first six year period.

### Planning Contributions

4.5

The proposed scheme will also make a contribution to the local community via a Section 106 agreement. Section 106 of the Town and Country Planning Act 1990 (amended) is a tool used for raising funds for essential infrastructure arising from development. This contribution will be used by the Council to fund new services and infrastructure in the local area (e.g. education, public space).

4.6

It is anticipated that the following Section 106 contributions will be provided as part of these proposals though the final contributions will be agreed in consultation with the local planning authority:

- provision of 82 affordable units;
- a contribution towards education provision of **c. £590,000**;
- a contribution towards health care provision of **c. £230,000**;

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<sup>35</sup> New Homes Bonus is calculated based on national averages, whereas Council Tax differs between areas and Local Authorities, hence numbers are slightly different.

- other contributions for transport and carbon offsetting of **c. £65,000**
- access to retained open space; and
- maintenance of retained open space.

4.7 Total S106 financial contributions are therefore likely to be approximately **£885,000**. This is an anticipated figure, which is subject to negotiations with the Local Planning Authority.

4.8 The Community Infrastructure Levy (CIL) is a new planning charge that came into force on 6<sup>th</sup> April 2010 through the Community Infrastructure Regulations 2010 (amended 2011 and 2012). CIL is charged on all new dwellings except for those intended to be used as social housing. The charge is applied per square metre of gross floorspace arising from new development. LBB intends to adopt a CIL charge in 2017.

4.9 Nevertheless, Mayoral CIL, which was introduced in 2012, is applicable. This levy is intended to raise funds to pay for transport. LBB falls within Zone 2 of the charging schedule, where a charge of £35 per sqm on net additional floorspace is required. The development will therefore provide a Mayoral CIL contribution of approximately **£550,000**, which combined with the anticipated s106 contributions will amount to **c. £1.4m**.

## Summary

- 4.10 The proposed development will help reduce the impact of local authority budget cuts in recent years by providing:
- a £2.5 million in New Homes Bonus Payments payable over a six year period;
  - b generating in the region of £350,000 in additional Council Tax Revenues per annum; and
  - c contributing **c. £1.4m** Mayoral CIL and S106 payments.



5.0

## Regeneration and Wider Socio-economic Effects

5.1

Housing delivery is a key component to sustainable economic development and as a conduit for regeneration in both a local and national context, as it provides a series of direct and indirect economic benefits that ultimately support the formation of more sustainable communities. It is essential that local planning authorities take into account the needs of existing and future residential and business communities, so as to ensure that balanced economic growth is achieved.

### Socio-economic Effects

#### Population

5.2

Section 2 provided an indication of forecast population growth in LBB to 2039. It can be expected, given the scale of forecast population growth and the development constraints elsewhere in LBB, that the Lower Sydenham local impact area will accommodate a portion of this growth. The forecast increase in older age groups could have ramifications for the local economy and housing provision in the medium to long term as there is a reduction in the working age population that comprise the labour market and spend money in the local economy.

#### Economy and Labour Market

5.3

Section 3 considers in detail the potential economic effects associated with the proposed development. It is understood that the construction sector provides a significant source of employment in LBB (over 5% of employee jobs), therefore the proposed development could assist in ensuring an on-going source of construction employment and could facilitate the generation of new employment opportunities for skilled trades people, lower skilled workers and the unemployed, particularly those currently seeking employment in the construction sector. Given that a relatively high proportion of LBB residents occupy higher tier occupations and that the residents in the Lower Sydenham local impact area are relatively less well skilled and occupy lower tier occupations, it is pertinent that there is a range of local employment opportunities available to all.

5.4

Alongside direct and indirect employment opportunities, housing supply can play a key role in the flexibility of the local labour market, which in itself is an important component of local economic competitiveness. This is because a shortage of housing, or a lack of affordability, can be a major barrier to people accessing work opportunities. A geographical mismatch between labour supply and demand can impede economic productivity levels. This is particularly the case for lower and intermediate level skills where a lack of geographical mobility is in part the consequence of a lack of available affordable homes.

- 5.5 With this in mind, increased housing supply generated by the new scheme could allow for a better match between labour and employment, therefore helping to improve overall economic competitiveness in LBB and the Lower Sydenham local impact area.

## Connectivity and Commuting

- 5.6 LBB benefits from excellent transport links to both central London and the wider south-east enabling strong functional economic linkages between different local economies.
- 5.7 As described in Section 2, there are strong outflows of labour to Inner London; a portion of this commuting will be via rail.
- 5.8 Table 5.1 presents the total number of entries and exits recorded at a number of the stations on the Hayes Southeastern line. The Office of Rail Regulation data shows that in 2015/16 Lower Sydenham station had the lowest level of station usage across the entire line, even against stations further south which have longer travel times to central London. Taking the two closest stations into consideration, usage of New Beckenham is 38% higher while usage at Catford Bridge exceeds Lower Sydenham usage by 316%.

Table 5.1 Station Usage Statistics 2015-2016 and Travel Times to Central London during AM Peak (8-9 a.m.)

Station	Number of Entries / Exits	Travel Time to London Cannon Street	Travel Time to London Bridge	Travel Time to London Charing Cross
Lewisham	10,595,486	18 mins	10 mins	22 mins
Ladywell	1,322,978	23 mins	10 mins	23 mins
Catford Bridge	2,402,410	25 mins	18 mins	25 mins
<b>Lower Sydenham</b>	<b>578,008</b>	<b>29 mins</b>	<b>16 mins</b>	<b>29 mins</b>
New Beckenham	799,004	31 mins	18 mins	31 mins
Clock House	1,154,194	33 mins	21 mins	34 mins
Elmers End	1,169,234	36 mins	24 mins	37 mins
Eden Park	604,406	40 mins	28 mins	41 mins
West Wickham	943,430	42 mins	31 mins	43 mins
Hayes	1,127,296	45 mins	34 mins	46 mins

Source: Office of Rail Regulation Station Usage Statistics/National Rail Enquiries/NLP analysis

- 5.9 Optimally, the majority of new residents would take-up employment in the area and reduce the need for longer distance commuting however, based on existing travel to work patterns, high economic activity rates, a highly qualified workforce, proximity to high paid employment and a diverse range of employment opportunities; it is likely that a portion of residents will out-commute from LBB. On the other hand, origin-destination data also indicated that 50% of people who work in LBB also live in LBB (39% in LBL). Therefore, a portion of new residents are also likely to take-up employment in centres across the Borough particularly those involved in public admin, education, health, financial and business services as well as wholesale and retail sectors.

- 5.10 In recent years there has been a marked policy shift at national and local level to encourage the use of sustainable transport. Providing new housing close to existing infrastructure represents a sustainable approach to planning. This correlates with LBB's Proposed Submission Draft Local Plan (2016) document, where one of the stated objectives is to:
- "Locate major developments where they can maximise the use of public transport."*<sup>36</sup>
- 5.11 The London Infrastructure Plan 2050 states that *"a Bakerloo Line extension could regenerate areas such as Old Kent Road and Catford, as well as supporting development in Outer London locations."*<sup>37</sup>
- 5.12 The data above suggests that the existing rail station at Lower Sydenham has the capacity to accommodate additional commuters. This station is located one / two minutes walking distance from the application site. As such, the proposed development provides the opportunity to provide additional housing in a sustainable location, whose residents will help support existing transport infrastructure.

## Housing

### Meeting local housing needs

- 5.13 In 2015, the housing targets for the London Boroughs as set out in the London Plan were increased, in recognition of the high level of housing need identified in London. The London Plan annual minimum level for new housing in LBB increased from 500 to 641 dwellings per annum (28%) and, for nearby LBL, it increased from 1,105 to 1,385 dwellings a year (25%), for the 2015 - 2025 period (London Plan table 3.1).
- 5.14 The proposed development will assist the Borough in meeting its housing target as set out in the London Plan. Providing 229 dwellings, the proposed development would meet 16% of the Council's annual housing target over the 2.3 year build period.
- 5.15 The annual target for LBB of 641 exceeds the estimated completions in the monitoring year 2014/15 of 550 and the average historical completion rates for 2007/08 – 2014/15 of 600 dwellings per annum.<sup>38</sup> This indicates that additional residential sites will be required to meet the minimum targets for new housing in the Borough. This is within a context of wider efforts to significantly boost housing supply to tackle London's widely acknowledged housing crisis.
- 5.16 LBB released its current five year housing land supply position in the document entitled 'London Borough of Bromley Five Year Housing Land Supply November 2016' which went to Bromley's Development Control Committee on the 24 November 2016. The minutes *"resolved that the five year housing land supply position from 1<sup>st</sup> April 2016 to 31<sup>st</sup> March 2021 as set out in Appendix 1*

<sup>36</sup> London Borough of Bromley, Proposed Submission Draft Local Plan, Page 17, para 1.3.17.

<sup>37</sup> London Infrastructure Plan 2050: A Consultation, page 37.

<sup>38</sup> London Borough of Bromley Five Year Supply of Housing (June 2015).

*of the report be agreed*". The five year housing land supply position is set out over the period 1 April 2016 to 31 March 2021. A number of discrepancies have been identified in the calculation of the Council's five year housing land supply calculation and have removed a minimum of 554 units. This reduces the Council to 4.18 years of housing supply. Our assessment of Bromley's Five Year Housing Land Supply has been submitted as part of the planning application alongside this document.

- 5.17 In LBL, 1,440 dwellings (net) were completed in 2014/15,<sup>39</sup> meeting the current London Plan target for Lewisham (1,385 dwellings p.a.). However, recent annual housing completion rates have been varied in LBL, ranging from 782 net annual completions in 2009/10 to 1,188 in 2011/12. On average, 1,117 dwellings per annum were completed in the years 2009/10 – 2014/15, indicating that a change in housing delivery will be required in LBL if it is to meet its housing need.
- 5.18 Located in a highly sustainable location adjacent to Lower Sydenham railway station and close to an existing bus route, the site represents a significant opportunity to contribute to the LBB identified housing need, and wider housing needs of LBL and London.

### Addressing barriers to housing

- 5.19 As indicated in Section 2, LBB residents face a number of barriers to accessing housing partially as a result of affordability constraints, high house prices and limited levels of affordable housing.
- 5.20 Affordable housing need in LBB is high. The Council's UDP Policy 11 and Draft Policy 2 of the Proposed Submission Local Plan (2016) document consider the provision of affordable housing. Both policies state that the Council will seek 35% provision on developments providing 11 residential units or more or where the residential floorspace is more than 1,000 sqm.
- 5.21 Dylon Phase 2 proposals include 82 affordable units; this equates to 36% of the scheme total number of units and as such, meets both the existing and emerging policy requirement of 35% (on a habitable room basis).
- 5.22 Given that the proportion of social or affordable rented housing stock is relatively low (14.1%) in LBB, higher provision of this tenure type within this scheme or similar is highly beneficial to local affordable housing provision.
- 5.23 The development has the potential to deliver much needed, well designed housing on a site that is well placed to make best use of scarce land resources and assist in meeting needs in some of the more deprived areas of LBB and the most deprived areas of LBL.

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<sup>39</sup> London Plan Annual Monitoring Report 12, 2014-15, July 2016

## Effects on Deprivation and Socio-economic Profile

- 5.24 Drawing together the preceding analysis, the proposal development provides an opportunity to develop a mixed community and act as a catalyst for regeneration in the Lower Sydenham local impact area (which includes parts of LBL which are relatively deprived) and to reduce deprivation levels in the locality in a number of ways:
- providing a mix of housing tenures and dwelling sizes to accommodate different types of households and meet identified needs;
  - increased levels of resident expenditure which will support local employment and local shops and services (particularly as a proportion of the new residents are likely to occupy upper tier occupations and have above average earnings);
  - provide a mixed pool of labour to support economic and job growth in LBB and LBL; and
  - provide critical mass to support the new and existing infrastructure provision.

## Cumulative Effects with Dylon Phase 1

### Dylon Phase 1 Scheme Description

- 5.25 In 2010, planning permission was granted, on appeal, for the following:<sup>40</sup>
- 149 residential units;
  - 449 sqm of A1 retail;
  - 135 sqm A3 café/restaurant;
  - 437 sqm D1 crèche; and
  - 6,884 sqm of B1 office.
- 5.26 In 2015, planning permission was granted, on appeal, to replace the B1 office floorspace with 74 residential units (in addition to the 149 units included in the 2010 scheme), resulting in 223 dwellings in total.<sup>41</sup> This scheme revision led to a reduction in the retail café and crèche floorspace. Consequently, Dylon Phase 1 comprises:
- 223 residential units;
  - 249 sqm of A1 retail;
  - 113 sqm A3 café/restaurant; and
  - 624 sqm D1 crèche.

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<sup>40</sup> Planning application ref. 09/01664/FULL1; appeal ref. APP/G5180/A/09/2114194.

<sup>41</sup> Planning application ref. 13/01973/FULL1; appeal refs. APP/G5180/A/14/2219910 and APP/G5180/A/13/2206836.

## Cumulative Economic Benefits

5.27

In combination, the economic benefits arising from Dylon Phase 1 and Dylon Phase 2 have the potential to ensure that regeneration of Lower Sydenham is mobilised. The potential cumulative economic benefits can be summarised as follows:

- a Injecting **£84.1 million** of private sector investment into the area;
- b **835 person years** of construction employment, equivalent to 335 temporary construction jobs at a range of skill levels will be directly supported over the 2.5 year build period;
- c **505 'spin off' jobs** could be supported in services and other businesses from the wage spending of construction workers and in the supply chain per year of construction;
- d **£20.2 million** additional GVA per annum from direct and indirect construction employment;
- e Resident expenditure benefits including approximately **£2.5 million in first occupation expenditure** and **£2.3 million** in net additional resident expenditure which could be retained within local shops and service each year;
- f Resident expenditure will help to support **17 FTE jobs** in the local area;
- g Creation of **33 FTE operational jobs** within the retail floorspace, café and crèche, generating **£1.6 million** additional GVA per annum;
- h **13 further 'spin off' jobs** (FTEs) could be supported by the operational employment of which 7 could be in the local area;
- i Delivering **£4.74 million New Homes Bonus** payments over the first six years in addition to **£692,000 in Council Tax** receipts and up to **£29,000 in Business Rates** each year;
- j Providing CIL and other planning contributions to support a wide range of community services, facilities and infrastructures.

## Wider Benefits

5.28

A desktop review of the Lower Sydenham area indicates that the local population could benefit from additional facilities within walking distance to meet day-to-day convenience needs and create a sustainable development pattern. The arising population from Dylon Phase 2 will assist in providing the critical mass to ensure that these facilities are viable and improve the retention of additional resident expenditure within the LBB. On this basis, in combination, these two developments could form a focal point for supporting a sustainable neighbourhood in the Lower Sydenham area that would support existing infrastructure and provide new facilities to the benefit of the wider area, which as the analysis shows would benefit from regeneration.

5.29

The arising population from Dylon Phase 2 will be well placed to sustainably support and take advantage of the convenience retail, crèche and cafe



proposed for the ground floor units with the Dylon Phase 1 development without the need for the use of public or private transport.

5.30

The Dylon Phase 2 proposals design framework includes substantial amounts of publically accessible, landscaped, open-space, an outdoor gym and seating areas to meet the needs of the new and existing residents in the Lower Sydenham local impact area to undertake recreational activities thereby contributing to improved physical health, fitness, mental health and wellbeing. This high quality environment will also provide opportunities for social interaction between people of different communities, fostering social inclusion and community development which is particularly important in areas with high levels of renting and more transient populations.

## Conclusions

6.0

6.1

This report considers the socio-economic characteristics of Lower Sydenham within the wider context of LBB and neighbouring LBL particularly focusing on the local labour market, labour market, deprivation, housing and social mix.

6.2

The analysis indicated that against a range of socio-economic indicators, Lower Sydenham underperforms compared with other parts of LBB and can be characterised as a neighbourhood in transition which also adjoins highly deprived areas in LBL.

6.3

The stark contrast between deprivation in LBL and LBB broadly aligns with the Borough boundaries; however, areas of deprivation do cross the Borough boundary in the Sydenham area where residents are relatively more deprived than the majority of LBB residents and experience deprivation which corresponds with LBL residents.

6.4

Against this backdrop, the proposed housing development at Dylon Phase 2 will generate a range of direct, indirect and catalytic effects.

6.5

The economic impacts of the proposed development are likely to include:

- a Injecting circa **£39.1 million** of total private sector investment into Lower Sydenham;
- b Creating approximately **385 person-years** of temporary construction employment, which is equivalent to **170 temporary jobs per year** of construction at a range of skill levels;
- c Supporting a further **255 'spin-off' jobs** in services and other businesses from the wage spending of construction workers and supplier sourcing;
- d Generating **£9.4 million of direct and indirect GVA** per annum during the construction phase of the scheme;
- e Helping deliver a significant boost to the local economy around LBB and LBL by generating a first occupation expenditure of **£1.26 million** on goods and services that make a house 'feel like home';
- f Once the scheme is fully constructed and occupied, new residents will also create **£6.5 million of additional annual resident spending** in shops and services, of which **£1.1 million** per annum will be retained within businesses within the local area. In total, the increased resident spending will support a further **8 FTE** local jobs;
- g Delivering **£350,000 of Council Tax** receipts per year once the scheme is built-out and occupied, and **£2.5 million of New Homes Bonus** payments profiled over the first six year period; and,
- h Contributing Mayoral CIL and S106 payments of approximately **£1.4m**.

6.6

When considered in combination with Dylon Phase 1, these economic benefits are significantly higher and form a strong basis for enabling regeneration

without the need for resources from the Council. The potential cumulative economic benefits are likely to include:

- a Adding **£84.1 million** of private sector investment into the area;
- b Supporting **835 person years of construction employment**, equivalent to 335 temporary construction jobs over the 2.5 year build period;
- c **505 'spin off' jobs** could be supported in the supply chain per year of construction;
- d **£20.2 million additional GVA** per annum from direct and indirect construction employment;
- e generating **£2.5 million** in first occupation expenditure;
- f generating **£2.3 million in net additional resident expenditure** in the locality which will help to support 17 FTE jobs in the local area;
- g Creation of **33 FTE operational jobs** within the retail floorspace, café and crèche, generating **£1.6 million additional GVA** per annum;
- h **13 further 'spin off' jobs** (FTEs) could be supported by the operational employment of which 7 could be in the local area;
- i Delivering **£4.74 million New Homes Bonus** payments over the first six years in addition to **£692,000** in Council Tax receipts and **£29,000 in Business Rates** each year; and,
- j Providing CIL and other planning contributions to support a wide range of community services, facilities and infrastructures.

6.7

The proposed housing development will also benefit the local community in a number of other ways including:

- a improving the residential environment in Lower Sydenham by delivering a high quality housing scheme comprising 229 dwellings that has the potential to provide 16% of the Borough's annual housing minimum target (albeit profiled over 2.3 years) equivalent to 63-85% of the proposed target for the area around Lower Sydenham;
- b delivering 82 high quality affordable units that are much needed in the area to help alleviate demand;
- c helping to manage the existing imbalance between housing supply and demand that represents a substantial threat to the on-going economic prosperity in London;
- d acting as a catalyst for regeneration of the wider Lower Sydenham area - coupled with Ian Ritchie's acclaimed design for Dylon Phase 1 the social and economic benefits for a neglected area on the borders of LBL and two of the most deprived areas in London - Downham and Bellingham will be transformational;;
- e supporting the vitality and viability of local centres and supporting local shops and services through net additional resident expenditure of **£1.1 million per annum** as well as increased wage expenditure arising from the new residents of the proposed development;

- f providing a Section 106 agreement/CIL contribution to support a wide range of community services, facilities and infrastructures that improve the local living environment for the resident population;
- g developing maintained, publically accessible open-space that improves the local environment and adds to the recreational value of the area resulting in a more attractive, accessible and safe place for all residents and visitors to enjoy;
- h supporting and complementing the Dylon Phase 1 proposals by forming the basis for a neighbourhood focal point and providing critical mass to support the commercial elements of the scheme;
- i providing for the remediation of historically contaminated land;
- j landscape townscape and environmental enhancements in an area where regeneration and inward investment is needed;
- k high quality design on a sustainable site where densities can be optimised thereby making best use of brownfield land whilst improving and enhancing and providing public access to the sizeable area of public open space.

6.8 These economic benefits also align with a wide range of national, sub-regional and local policy objectives. In particular, the proposed development will increase the supply of high quality and sustainable homes in Bromley, which will help to meet projected requirements, enhance the prosperity of the local population through the creation of new employment opportunities, and contribute towards the vitality of Lower Sydenham.

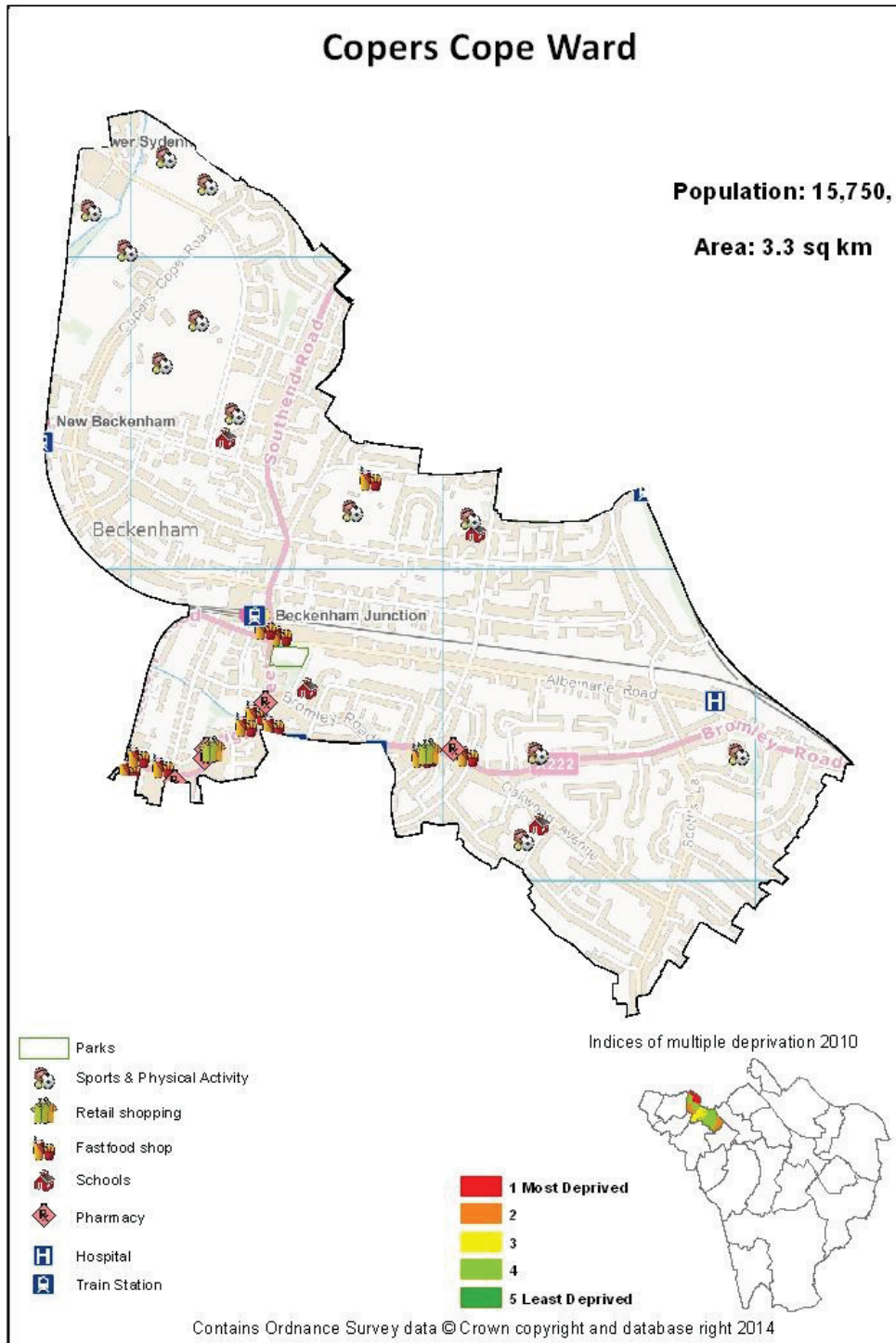
# Appendix 1   Bromley Joint Strategic Needs Assessment 2014 Extract: Copers Cope Ward Profile



Bromley Clinical Commissioning Group

# **BROMLEY JOINT STRATEGIC NEEDS ASSESSMENT 2014**





BROMLEY JOINT STRATEGIC NEEDS ASSESSMENT 2014

Copers Cope		Indicator Year	Indicator	Indicator value	Ward Rank	Percentile Rank
DETERMINANTS OF HEALTH	Demography	2013	Population (GLA)	15750		
		2013	Population density (GLA)	4803.03	19	84.1
		2013	% Children (0-4)	6.30	13	56.8
		2013	% Older people (75+)	8.60	10	43.2
		2011	% Lone parent households	5.03	8	34.1
		2011	% Lone pensioner households	13.31	14	61.4
		2011	% BAME	17.40	16	70.5
	Deprivation	2011	% Not Born in UK	20.30	20	88.6
		2010	IMD 2010 (Mean)	11.92	11	47.7
	Employment and Education	2010	IDACI 2010 (Score)	0.17	14	61.4
		2011	% with no qualifications	12.10	1	2.3
		2011	% Never worked/Long term unemployed (16-64)	1.80	12	52.3
		2012/2013	% Average workless benefit claimants	12.20	11	47.7
		2011	% Routine and semi - routine workers	10.36	2	6.8
		2012/2013	% Good level of development at age 5	67.14	15	65.9
		2012/2013	Key stage 2: Level 4 and above achievement	78.67	8	34.1
	Housing and the Neighbourhood	2012/2013	GCSE: 5+A*-C achievement	66.67	10	43.2
		2011	% Overcrowded households	9.79	17	75.0
		2011	% Social rented households	9.20	12	52.3
		2011	Mortgage Repossession Orders	10.00	9	38.6
		2011	Landlord Repossession Orders	35.00	17	75.0
	Well-being and Lifestyle	2012/13	Crime rate per 1000	66.20	13	56.8
		2011	Average Public Transport Accessibility score	3.00	18	79.5
		2011	% reporting bad and very bad health	3.50	8	34.1
		2011	% Funded Social care (18+)	4.37	13	56.8
		2012	Overall wellbeing probability score	2.00	8	34.1
		2012-2013	% Recorded smokers	11.61	9	38.6
		2012-2013	Substance misuse (in treatment) per 1000	1.97	12	52.3
		2009-2011	Teenage conception rates	30.36	13	56.8
		2009/10- 2011/12	% Obese children in 4 -5 year olds	7.50	10	43.2
		2009/10- 2011/12	% Obese children in 10-11 year olds	12.00	3	11.4
		2006-2008	Obesity estimate (16+)	17.10	1	2.3
		2006-2010	Healthy eating estimates	42.30	21	93.2
		2006-2010	Binge drinking estimates (16+)	17.00	21	93.2
HEALTH OUTCOMES	Disease and Death	2006-2010	Female life expectancy	83.60	10	43.2
		2006-2010	Male life expectancy	79.80	10	43.2
		2012/2013	% Recorded Diabetes (16+)	2.99	4	15.9
		2012/2013	% Recorded Stroke	1.28	7	29.5
		2012/2013	% Recorded Serious Mental Illness	0.49	15	65.9
		2012/2013	% Recorded COPD	0.66	2	6.8
		2012/2013	% Recorded Asthma	8.15	7	29.5
		2012/2013	% Recorded Epilepsy	0.98	8	34.1
		2012/2013	% Recorded Learning disability	0.06	2	6.8
		2012/2013	% Recorded Dementia	0.32	11	47.7
		2012/2013	% Recorded Coronary Heart Disease	2.50	6	25.0
		2012/2013	% Recorded Chronic Kidney Disease	2.30	7	29.5
		2012/2013	% Recorded Heart Failure	0.55	6	25.0
		2012/2013	% Recorded Atrial Fibrillation	1.68	12	52.3
		2012/2013	% Recorded Hypertension	11.08	6	25.0
		2012/2013	% Recorded Cancer	2.03	10	43.2

### **Summary of Key Issues**

Copers Cope is located in the northern part of the borough bordering Lewisham. This is a densely populated area with average deprivation levels. Copers Cope has the highest proportion of working age population in Bromley and is home to a considerable minority ethnic and a non-UK born community.

Although there are few older people living in this area, there is a presence of lone pensioner households. Similarly there is an average proportion of social rented households but high levels of overcrowded housing. There has been a high record of landlord repossession court orders which is a measure of the impact of the economic downturn.

On average the working age population are economically active. A high proportion of residents have qualifications which is reflected in the low proportions of routine and semi-routine workers. There is variation in educational attainment in pupils attending state funded schools. Achievement of good level of development at age 5 is above average, GCSE attainment is average, whilst attainment at Key stage 2 is poor.

The ward is well served by two train stations and tram link making for easier connections within and out of the borough thus giving it a good score on the Public Transport Accessibility index.

Although there is no general practice situated within the ward boundaries, Beckenham Beacon is situated just outside the south west border of the ward which provides a range of planned care and urgent care facilities.

People are reporting good and very good health although overall sense of wellbeing is average. All lifestyle risk factors as measured by healthy eating, smoking, obesity in adults and children are good except for binge drinking which is high. The ward has the second highest record of binge drinking in the borough.

Life expectancy is significantly below average however there is a low burden of disease except for serious mental illness which is above average. The overall low burden of disease reflects the young age of the population, the other long term conditions could present later in life and have not yet become apparent.



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APPEAL REFERENCES  
APP/G5180/W/15/3135639  
AND  
APP/G5180/W/16/3144248

APPEALS BY RELTA LIMITED (1) AGAINST THE REFUSAL AND NON- DETERMINATION OF PLANNING APPLICATIONS BY THE LONDON BOROUGH OF BROMLEY (2) FOR THE REDEVELOPMENT AND ENHANCEMENT OF THE FORMER DYLAN LAND WORSLEY BRIDGE ROAD/STATION APPROACH LOWER SYDENHAM LONDON SE26 5BU

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**Statement of Truth of Mr Guido James Zammit.**

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**Relating to Appeals concerning Former Dylan Land Worsely Bridge Road/Station Approach Lower Sydenham**

1. My name is Guido James Zammit
2. I live at 54 Bromley Common, Bromley, Kent, BR2 9PF Bromley Kent
3. I have known and worked on parts of the Relta appeal site for nearly thirty years. There is now shown to me a plan and an aerial Photograph **marked GJZ 1** which I understand shows the site of the current applications by Relta Limited edged in red.
4. I am therefore very familiar with the site and personally aware of all of the activities which have been carried on within it since my wife and I first took on the running of Footzie Social Club in October 1987
5. Whilst the social club closed and Footzie Social Limited was wound up some years ago I currently provide site security for Relta Limited and manage the site. I therefore have first-hand knowledge of the activities which were and continue to be carried on at the site from 1987 to the present day.
6. When we first took over the club in 1987 my wife and I lived in the club house for a while, not only to provide temporary accommodation for ourselves but in order to provide security and protection against fly -tippers trespassers vandals and travellers and to work full time on the renovation of the club house.
7. After about a year of living in the club-house we parked a static caravan and kept guard dogs on the site in order to provide full time security and protection. There was a constant threat to the site from fly tippers and the costs of cleaning up dumped materials and abandoned vehicles. Vehicles would often turn up unannounced, break into the site and dump materials such as asbestos and builders waste.



**APPEAL REFERENCES**  
**APP/G5180/W/15/3135639**  
**AND**  
**APP/G5180/W/16/3144248**

8. I found that reporting such matters to the police was ineffective and that the cost of cleaning up fly tipped material was significant. From the early days we therefore ensured that a member of staff lived on site at all times. There now is shown to me **marked GJZ 2** a photograph of the site with the static caravan in the centre of the picture. To the left of the picture is my boat which I stored on site and sold in 1994 or 1995 so the picture would have been taken by me on or before that date. The caravan remains on the site to this day.
9. When I took over the social club premises in late 1987 they were in a state of considerable disrepair. Dylon International were still the owners at that time and I can confirm they were using triangular area and the hard surfaced areas to the south of the site and the old tennis court areas for outside storage of ~~chemicals~~ waste products and other materials as well as vehicle parking.
10. When my wife and I first took over the social club – the former tennis courts had been long abandoned and unusable for tennis or any kind of sporting activity. This area in turn was used for parking of commercial vehicles and outdoor storage.
11. The site lies on the boundary of the Lewisham and Bromley and in the early years it appeared that each authority thought the other owned it – hence we were generally left to our own devices no-one tended to trouble us or question the commercial uses of the site and we were generally allowed to get on with our activities without the intervention either authority
12. A football team did use the pitch initially but the land was poorly drained and it was not usually possible to hold more than one or two matches a week without ruining the playing surface.
13. As a sporting venue the site was further handicapped by the fact that there was no floodlighting and no separate training areas
14. The recreational use was clearly not viable by itself so we attempted to diversify and expanded the food and drink side of the business. The premises were licensed and my wife and I were in effect the publicans).
15. At its peak the premises were well frequented by the Workers at the Dylon factory as we laid on a full bar and restaurant service at lunch times and a Sunday roast on Sundays. .
16. We also catered for wedding receptions birthday parties anniversaries and events on site. For a while the club house was a popular entertainment venue with at least two events a month and use at evenings and weekends. To supplement our income we also held boot fairs and Sunday markets on the field – and these were well attended but did sometimes give rise to some complaints about parking on the surrounding roads

**The Garden Centre and contracting business**

17. For a period of about three to four years until about 1994 the area of hard standing to the south of the site where- Dylon had stored chemicals dye stuffs and other materials remained in use as as a retail garden centre and storage area by the operator's gardening contracting business (JC Gardens). There is now shown to me **marked GJZ 3** a photograph taken by me of the southern corner of the site with an advertising banner confirming its use for these purposes. This would have been taken some time between 1990 and 1994.
18. The operator of JC Gardens emigrated to Australia and after that the commercial use of the hard surfaced areas in the southern part of the site reverted to storage of a variety of materials including skips, storage containers recycled builders materials and vehicles awaiting repair and for



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parking of commercial vehicles. The use of this area has continued in much the same way until the present day. Parts of the appeal site are rated for commercial storage and parking

19. The residual sports and leisure use of the premises has long ceased and the site is and remains locked bolted and inaccessible to the general public.

**The Field**

20. During the time when the field was used for football we had a single football pitch. This was poorly drained and could therefore not be used more than about twice a week and sometimes not at all.
21. As indicated above we also used the field for boot fairs and Sunday markets
22. The field is now partly used as a contractors' compound by the developer of the first phase of the Dylon Works redevelopment.
23. Following the closure of the Dylon Works the use of the Social Club declined and eventually the social club had to close.

**The Buildings**

24. The club house and outbuildings are dilapidated and have now fallen into decline and are in a poor state of repair. Whilst they are incapable of economic repair they are partly used for secure storage.. The hard standings and some of the buildings continue to be used for commercial storage and the parking of cars and commercial vehicles.
25. The static caravan remains on site for security reasons as it has done for more than 10 years. Following the closure of the Dylon Works with the advent of more sophisticated forms of entertainment drink driving laws, punitive taxation of alcoholic drink the use of the Social Club declined and eventually the club had to close.
26. In recent years the water supply to the club house was severed and the cost of bringing in a new supply to the buildings would have been completely uneconomic. Whilst we have tried to patch and mend them as best we can the state and condition of the buildings on the site is not what it was and they have sadly declined in recent years; As the aerial Photos show they are none the less essentially the same buildings and structures as were on site a decade ago.

**The Hard Standings**

27. For as long as I have known the site the hard surfaced triangular area to the south of the site and certain outbuilding has been in separate commercial uses including the garden centre and contracting business, commercial storage as well as the parking of cars and commercial vehicles..
28. When we took over the club the site was semi derelict but with the hard surfaced areas actively used for outdoor storage by Dylon. The garden centre and contracting business occupied the southern corner of the site from about 1990 to roughly 1994 when the operator emigrated. After that the hard standings were used for commercial storage including skips, containers vehicles awaiting repair and recycled building and other materials which would be kept on site pending sale or disposal
29. Access to the triangular area in the southern part of the site was via Station Road access and the perimeter road which can be seen in the attached photographs now shown to me **marked GJZ 4**

Guido James Zammit

First

Dated: 19<sup>th</sup> April 2016

**APPEAL REFERENCES**  
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**AND**  
**APP/G5180/W/16/3144248**

which I understand dates back to December 1996 and the photo -collage now shown to me **marked GJZ 5** which also show the storage uses skips and parked vehicles on the hard standings within the former Dylon Land .

30. I can confirm from my personal knowledge and observations that these commercial storage and vehicle parking activities on the former Dylon land date back more than ten years and continue to the present day.

I believe that the facts and matters confirmed in this Statement are true.

Signed Guido James Zammit

DATED 19<sup>th</sup> April 2016



Guido James Zammit

First

Dated: 19<sup>th</sup> April 2016

**APPEAL REFERENCES**

**APP/G5180/W/15/3135639**

**AND**

**APP/G5180/W/16/3144248**

Dated 19<sup>th</sup> April 2016

Appeals by RELTA Limited against the refusal and non- determination of planning applications for the redevelopment and enhancement of the former Dylon Land Station Approach Lower Sydenham SE26 5BU

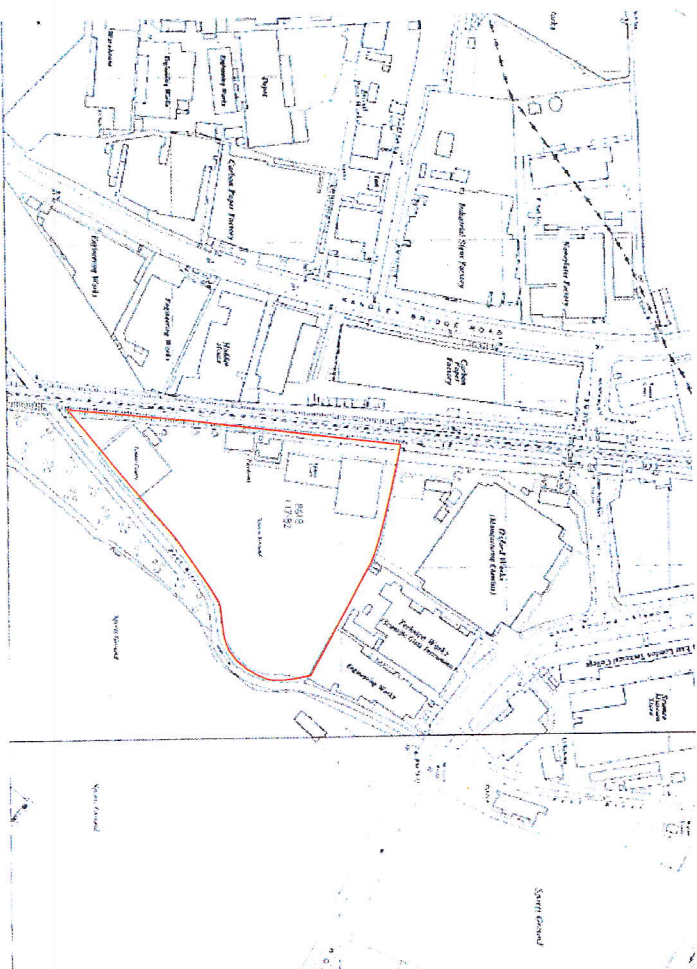
**EXHIBIT "GJZ1" TO STATEMENT OF TRUTH OF MR GUIDO JAMES ZAMMIT.**

Regarding Former Dylon Land Worsely Bridge Road/Station Approach Lower Sydenham  
and

Relating to Appeals concerning Former Dylon Land Worsely Bridge Road/Station Approach Lower  
Sydenham

APPEAL NUMBERS APP/G5180/W/15/3135639 AND APP/G5180/W/16/3144248

Fig. A2.5: OS map 1971







A21

APRIL 2018

B. King



Guido James Zammit

First  
Dated: 19<sup>th</sup> April 2016

**APPEAL REFERENCES**  
**APP/G5180/W/15/3135639**  
**AND**  
**APP/G5180/W/16/3144248**

Dated 19<sup>th</sup> April 2016

Appeals by RELTA Limited against the refusal and non- determination of planning applications for the redevelopment and enhancement of the former Dylon Land Station Approach Lower Sydenham SE26 5BU

**EXHIBIT "GJZ2" TO STATEMENT OF TRUTH OF MR GUIDO JAMES ZAMMIT.**

Regarding Former Dylon Land Worsely Bridge Road/Station Approach Lower Sydenham  
and

Relating to Appeals concerning Former Dylon Land Worsely Bridge Road/Station Approach Lower  
Sydenham

APPEAL NUMBERS APP/G5180/W/15/3135639 AND APP/G5180/W/16/3144248



Bruno



Guido James Zammit

First  
Dated: 19<sup>th</sup> April 2016

**APPEAL REFERENCES**  
**APP/G5180/W/15/3135639**  
**AND**  
**APP/G5180/W/16/3144248**

Dated 19<sup>th</sup> April 2016

Appeals by RELTA Limited against the refusal and non- determination of planning applications for the redevelopment and enhancement of the former Dylan Land Station Approach Lower Sydenham SE26 5BU

**EXHIBIT "GJZ3" TO STATEMENT OF TRUTH OF MR GUIDO JAMES ZAMMIT.**

Regarding Former Dylan Land Worsely Bridge Road/Station Approach Lower Sydenham  
and

Relating to Appeals concerning Former Dylan Land Worsely Bridge Road/Station Approach Lower  
Sydenham

APPEAL NUMBERS APP/G5180/W/15/3135639 AND APP/G5180/W/16/3144248



*David*

Guido James Zammit

First  
Dated: 19<sup>th</sup> April 2016

**APPEAL REFERENCES**  
**APP/G5180/W/15/3135639**  
**AND**  
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Dated 19<sup>th</sup> April 2016

Appeals by RELTA Limited against the refusal and non- determination of planning applications for the redevelopment and enhancement of the former Dylon Land Station Approach Lower Sydenham SE26 5BU

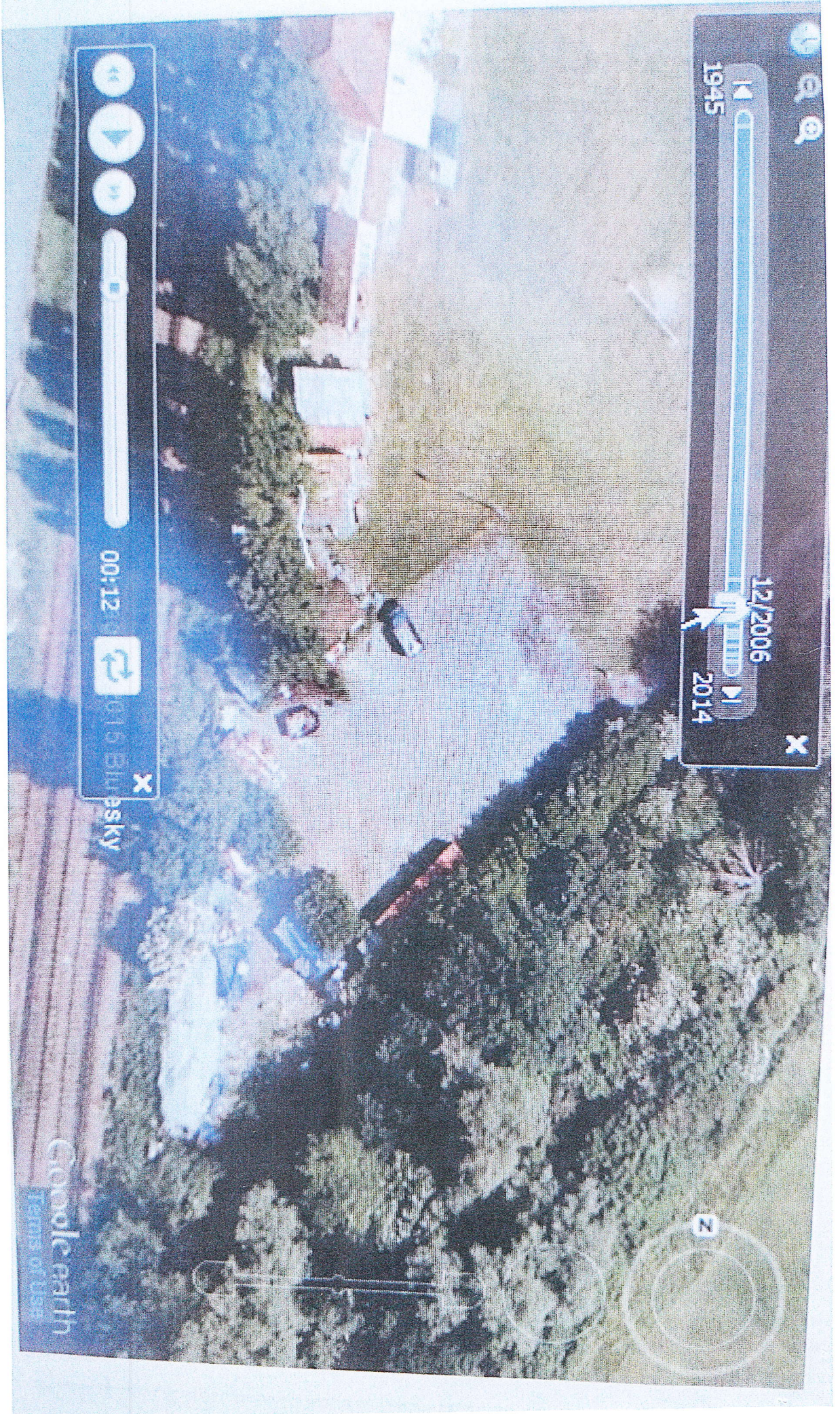
**EXHIBIT "GJZ4" TO STATEMENT OF TRUTH OF MR GUIDO JAMES ZAMMIT.**

Regarding Former Dylon Land Worsely Bridge Road/Station Approach Lower Sydenham  
and

Relating to Appeals concerning Former Dylon Land Worsely Bridge Road/Station Approach Lower  
Sydenham

APPEAL NUMBERS APP/G5180/W/15/3135639 AND APP/G5180/W/16/3144248





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Guido James Zammit

First

Dated: 19<sup>th</sup> April 2016

**APPEAL REFERENCES**

**APP/G5180/W/15/3135639**

**AND**

**APP/G5180/W/16/3144248**

Dated 19<sup>th</sup> April 2016

Appeals by RELTA Limited against the refusal and non- determination of planning applications for the redevelopment and enhancement of the former Dylan Land Station Approach Lower Sydenham SE26 5BU

**EXHIBIT "GJZ5" TO STATEMENT OF TRUTH OF MR GUIDO JAMES ZAMMIT.**

Regarding Former Dylan Land Worsely Bridge Road/Station Approach Lower Sydenham  
and

Relating to Appeals concerning Former Dylan Land Worsely Bridge Road/Station Approach Lower  
Sydenham

APPEAL NUMBERS APP/G5180/W/15/3135639 AND APP/G5180/W/16/3144248



Commercial Storage Uses

*Bauer*