

**Bromley Court Hotel
Bromley Hill
Bromley
BR1 4JD**

January 2017

Planning Statement

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Introduction

On behalf of the Driver and Vehicle Standards Agency (DVSA), Cushman and Wakefield are instructed to submit a planning application seeking the change of use of part of Bromley Court Hotel, Bromley Hill, Bromley, BR1 4JD (herein referred to as 'the Site') from existing C1 hotel use to sui generis use to allow the temporary provision of a driving testing centre.

This document should be read in conjunction with the following submitted with this application:

- [Statutory planning application forms and certificates;](#)
- [Site Location Plan prepared by Cushman & Wakefield; and](#)
- [Proposed Plan drawings prepared by DVSA.](#)

This Statement examines the potential impacts arising from the proposed use identified above, to allow a change of use of the Site to provide driving testing.

Section 2 of this statement sets out a summary of the site and the surrounding area and relevant planning history. Section 3 describes the proposal and context to the development, and Section 4 reviews the relevant national and local planning policy. Section 5 assesses the key planning considerations and Section 6 provides a conclusion to the Statement.

Site and Surrounding Area

The site is located one mile to the north of Bromley town centre on the western side of Coniston Road from which the site is accessed. The surrounding area is predominantly a mix of residential and commercial uses.

The house was built as a suburban villa by Charles Long, later 1st Baron Farnborough, in circa. 1800 and originally sat in a much larger estate, bordered to the east by the A21 London Road and to the west by the River Ravensbourne. Bromley Court Hotel was established as a hotel in 1931.

The hotel has an overall site area of 1.107ha.

The site is located within the administrative boundary of the London Borough of Bromley. The site falls within Flood Zone 1, with an annual flooding probability of less than 1 in 1,000.

The site is undesignated as per the adopted Proposals Map and the subject building is not listed, located within a conservation area, nor of any cultural importance.

The subject building is three-four storeys in height and is in good structural condition. The main existing vehicular accesses to the building are via Coniston Road and these will continue to be used by the proposed development.

In terms of accessibility, the Hotel has a PTAL rating of 1b equating to a 'Very Poor' level of public transport accessibility. The Borough of Bromley has a total of 26 railway stations with Bromley also having a recently opened London Overground extension serving the north-west of the Borough with links to Croydon, East London and the London Underground network.

A Site Location Plan is provided in **Appendix 1** for additional information.

Context

The Driver and Vehicle Standards Agency (DVSA) is an executive agency in the Motoring and Freight Services group, sponsored by the Department for Transport with the purpose of improving road safety in Great Britain by setting standards for driving and motorcycling and making sure drivers, vehicles operators and MOT garages follow roadworthiness standards. The DVSA is a national organisation responsible for the statutory regulation of driving instructors and trainers, and promoting voluntary registers and non-statutory activities to improve road safety and driving standards.

There are over 400 practical driving and multi-purpose test centres and theory test centres run by the DVSA nationally. The DVSA is a trading fund which is primarily funded through fees and revenue from road safety initiatives.

The proposal would allow the DVSA to expand their car vehicle licence testing centre facilities by changing the use of part of Bromley Court Hotel from C1 to Sui Generis use. The site has been acquired as an additional temporary service point for their public service so as to help manage the waiting time service targets for driving test appointments currently experienced in the area.

Planning History

The subject building is currently in use as a hotel. The following table summarises the most recent planning history for the site:

Reference	Description	Decision	Date
15/02452/FULL1	Hybrid planning application comprising full planning application for demolition of the existing plant rooms and refurbishment of the existing hotel including part one/three/four/five storey extensions and elevational alterations – together with outline planning application for the erection of a new leisure centre. Also, alterations to the existing access and increased parking provision (total 92 spaces).	Granted	23/10/2015

In addition to the above referenced planning permission, the site has been subject to a number of minor applications.

It is worth noting that the hotel has been in use since the 1930s and, as such, pre-dates the start of the Town & Country Planning Act 1947. The hotel enjoys a varied and undefined (in planning terms) combination of uses unlike a new hotel. As far as the owners of the site are aware there is no formal planning permission document for the current use.

Proposals

This application seeks detailed planning permission for:

Partial change of use from C1 hotel use to additionally accommodate a car licence testing centre (sui generis) use for a temporary period of 6 months at Bromley Court Hotel, Bromley Hill, Bromley, BR1 4JD

The proposed use would allow car licence testing to temporarily operate from a section of Bromley Court Hotel, Bromley Hill, Bromley, BR1 4JD for a period of up to 12 months.

The proposed use would operate from two meeting rooms within the Hotel; the Bowie room and the MacMillan room. The Bowie room would be used by 6no. staff for assessment writing/administration purposes and the MacMillan room would be used by customers as a waiting room. Access to the MacMillan room would be via a separate entrance away from the main hotel reception area.

The testing would be for car licence testing only, to operate Monday-Friday only. Tests would start and finish on site with the practical element of the test being conducted on the public highway. It is proposed that a total of 6no. examiners will operate from the site on any given testing day. The traffic movements associated with the arrival and departure of staff would amount to 4no. per day (total of 24no. vehicle movements). This quantum of traffic movement is not considered to exacerbate the present traffic situation to any significant extent.

It is envisaged that each examiner will conduct 7no. tests per day (maximum). Based on 6no. examiners with 4no. vehicle movements per assessment, the total number of movements would be a maximum of 168no. each day. The timing of the manoeuvring element of the test would be staggered so that each test would be undertaken individually in order to allow for safe vehicle movements.

The structure of the proposed testing is set out below:

1. Test candidates and their instructor would enter the site via Coniston Road in their vehicle. The examiner would then swap places with the instructor.
2. The car exits the site via Coniston Road to undertake the driving test, which takes up to 1 hour.
3. The test would end on site or on nearby Coniston Road. De-brief would follow.
4. On completion of the test, the candidate and instructor will leave and the examiner will use the identified office space to write up the test reports.

Dependant on the number of tests booked, examiners will likely arrive on site at 0730 at the earliest. The first candidate will arrive at the site at around 0800 at the earliest and the last test is likely to start at 1530. Tests last approximately 1 hour and so there are not likely to be any movements relating to the proposed use after 1700 hours.

The premises have been acquired to serve as an additional temporary service point for the DVSA's public service activities to assist in the management, and reduction, of waiting time service targets for driving test appointments experienced in the area.

The use has specific operational requirements, being located within the local area, providing appropriate internal accommodation, access to facilitate the testing use and car parking to provide for examiners and candidates. This site offers all of these requirements in a convenient location. The DVSA remains committed to this site; the location fully meets the DVSA's operational criteria and the site has the added advantage of 6no. reserved parking bays for candidates. These will be in the vicinity of the separate entrance providing access directly to the McMillan Room. A further 6no. parking spaces will be provided for this use to serve the staff. Further car parking is not considered necessary for test candidates as they will arrive in their vehicle with their instructor and park in a reserved bay, report to the waiting room and return with their allocated examiner to the vehicle to begin their test.

The use is proposed for a temporary period of 6 months, after which it will be reviewed with a view to extending the arrangement.

The proposals relate to the change of use of the premises only; the application does not proposed any additional development on site as a result of the application, with no additional building works or physical changes proposed, other than minor changes to sockets and locks.

Planning Policy Context

As required by s.38 of the Planning and Compensation Act 2004, planning applications must be determined in accordance with relevant policies set out in the appropriate development plan, unless material considerations indicate otherwise. In this section, we set out the key national, regional and local planning policies relevant to this planning application.

National Planning Policy Framework (2012)

The National Planning Policy Framework (NPPF) was published in March 2012. It replaces previous national planning guidance and aims to protect the environment and to promote sustainable growth.

The NPPF sets out a presumption in favour of sustainable development. **Local planning authorities should positively seek opportunities to meet the development needs of their area** and approve development proposals that accord with the development plan without delay. The plan further encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century. **Local authorities should support existing business sectors, taking account of whether they are expanding or contracting** and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.

Paragraph 19 of the NPPF further states that the planning system should do everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

London Plan 2015

The London Plan forms the strategic tier of the statutory development plan affecting the site. London Borough Local Plans therefore need to be in general conformity with the Plan and its policies guide decision on planning applications by local planning authorities and the Mayor.

Policy 3.16 – Protection & Enhancement of Social Infrastructure

The Mayor acknowledges the need for additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. Those development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments.

London Borough of Bromley – Unitary Development Plan (Saved Policies, 2006)

Bromley's UDP was adopted in July 2006. A number of policies in the UDP expired in July 2009. The remaining policies continue to be saved as part of the Development Plan.

With regards to community facilities, Policy C1 stipulates that those proposals for *development of change of use that meets an identified health, education, social, faith or other needs of particular communities or areas of the Borough will normally be permitted provided that it is accessible by modes of transport other than the car and accessible to the members of the community it is intended to serve*. In this way, the Council seek to promote the provision of developments that would meet the current and future health, education, faith, social or other needs of particular communities or areas of the Borough. It is recognised that community facilities can support social inclusion.

GVA Economic Development & Employment Land Study (2010)

London Borough of Bromley (LB Bromley) commissioned GVA Grimley Ltd to undertake an Economic Development and Employment Land Study to underpin their Local Development Framework (LDF) and establish priority actions for the Council and other key partners over the medium and long term (to 2025).

A number of economic development strategy recommendations are outlined, with it stipulated that encouragement will be shown to support education attainment aspirations and increase the awareness of the benefits of vocational skills. The report also provides that opportunities will be increased for those in deprived areas to access employment opportunities. It is outlined that work will continue with partners to remove barriers such as low skills and aspirations amongst the local population.

Planning Assessment

This section reviews the key planning considerations arising from the proposal. This application proposes to:

- Secure the provision of change of use of Bromley Court Hotel from C1 (Hotel) to Sui Generis use (for Driving Test Centre purposes).
- Create increased employment opportunity within an established site
- Provide an active and viable use which will ensure the premises remain in a good quality condition.

The proposed partial occupation of Bromley Court Hotel would secure the continued provision of licence assessment to meet the level of demand experienced in the local area. The proposed site is an accessible location where appropriate car parking and floorspace is available to support the identified use, ensuring an efficient and compatible use of land.

The facility is proposed to accommodate car licence testing only. Tests would start and finish on site (or finish on a street nearby), with the practical element of the test being conducted on the public highway, away from the premises. In this way, there will be no changes to existing vehicle movements on-site; indeed, the existing use of the site generates regular traffic movements with a number of access/exit points from the site onto Coniston Road. This venue has been identified as suitable for the temporary continuation of testing; the proposed 12-month consent being applied for is to allow the arrangement to be extended upon review after the initial 6-month trial period.

The proposed use would allow up to 6no. examiners to be based at the site on any testing day. Each examiner would provide a maximum average of 7no. tests per day, resulting in a total of 42no. tests a day (maximum).

The site is considered suitable for the operational requirements of the DVSA; located as it is within the London Borough of Bromley, providing suitable/functional internal accommodation for a short temporary period of time and without the need for excessive financial outlay. Access facilitates the testing use and sufficient, allocated car parking spaces are provided for the use of both examiners and candidates. As aforementioned, 6no. reserved bays will be for candidates, with an additional 6no. spaces elsewhere on site for the use of examiners. In planning policy terms, the site is undesignated as per the Proposals Map and does not have any other site constraints affecting the proposals.

The application proposes no change to the existing operations and exterior/interior of the site.

The scheme will contribute to the Borough's wider regeneration initiatives, including resident's skill-sets to improve mobility and access to job opportunities; the proposals will ensure an active and compatible use at the site and employment/training opportunities will be retained as part of these proposals with 6no. staff members proposed to operate from these premises. In this way, it is considered that the proposals fully comply with policy requirements.

The Economic Development & Employment Land Study prepared by GVA in 2010 states that one of the opportunities for development up until the period 2025 is to raise skills, educational attainment and attract and grow businesses, recognising this as a key factor to helping people into work or into better paid employment opportunities.

The proposed development will support the council's agenda towards raising basic skills and aspiration for residents living in the Borough of Bromley. A driving licence enables local residents to improve their mobility, allowing them to apply for jobs outside of their immediate vicinity, further improving the local economy. Therefore, the temporary presence of a driving test centre in Bromley will promote the opportunity for locals to increase their skills and raise their aspirations. This additional service point will allow candidates to be seen more efficiently and decrease the waiting times experienced in the area.

In regards to car parking, the use will benefit from 12no. car parking spaces (as agreed by the existing operators of the site); Half of these will be for the use of candidates and half for examiners. Car parking spaces will be located in a convenient position closest to the proposed meeting rooms to be used.

Lastly, the proposed use will not have any detrimental impact on residential or surrounding amenity and is considered to be a fully compatible use to those neighbouring activities which are predominantly a mix of commercial and residential use. Indeed, the proposed hours of operation have been sought in direct consideration to nearby amenity.

Conclusion

The wider premises are in use as a Hotel. This application refers to the temporary change of use of part of the site only from C1 Hotel use to Sui Generis use for Driving Test Centre purposes for a period of 6 months initially after which it will be reviewed with a view to extending the arrangement. The justification for this use is to meet local need/demand. The proposed number of tests would be limited to 6no. examiners each undertaking 7no. tests per day (maximum).

The proposal will benefit the local economy by allowing the testing facility to increase the numbers of tests being carried out and facilitate the additional employment of testing staff in the local area.

No internal or external changes are proposed as a result of these proposals.

It is considered that the proposals fully accord with National and Local planning policy to make most efficient use of land, maximise the use of developed sites and support both employment and skills development in the local area.

Appendices

Appendix 1 – Site Location Plan



Appendix 2 – Location of 2no. Meeting Rooms Proposed to be used for a Sui Generis Vehicle Licence Testing Facility.

