



14 June 2020

To: Alexa Michael, Chairman, Development Control Committee

cc: Michael Tickner, Copers Cope Ward Councillor Stephen Wells, Copers Cope Ward Councillor Russell Mellor, Copers Cope Ward Councillor Christine Harris, Kelsey and Eden Park Councillor Diane Smith, Kelsey and Eden Park Councillor

> Peter Dean, Kelsey and Eden Park Councillor Ian Dunn, Clock House Ward Councillor Vanessa Allen, Clock House Ward Councillor

Josh King, Clock House Ward Councillor Kevin Brookes, Penge and Cator Ward Councillor Kathy Bance, Penge and Cator Ward Councillor

Simon Jeal, Penge and Cator Ward Councillor

Re Upward Development Permitted Development Rights and Beckenham Town Centre Conservation Area Appraisal

Dear Cllr Michael

Upward Development Permitted Development Rights

We are writing on behalf of the Copers Cope Area Residents' Association (CCARA) & the West Beckenham Residents' Association (WBRA), which between us have over 1750 paid up members across of Beckenham wards.

At the upcoming Development Control Committee (HPR 2010/015) discusses, in relation to the potential impact of Upward Development Permitted Development Rights, the availability of Article 4 Directions which can dissapply the regulations in specified areas.

Beckenham has a large number of purpose built flats constructed between 1948 and 2018. Many are in visually sensitive areas, for example close to Conservation Areas or parks. We therefore urge you to adopt Article 4 Directions for these areas, and will happily work with you to identify where they are sited.

www.coperscope.org.uk & www.westbeckenhamra.org

To protect and promote the interests of residents in matters of local concern.

CCARA, founded in 1935, covering central and northern Beckenham.

WBRA, founded in 1945, covering parts of Kelsey and Eden Park, Clock House and Penge and Cator.

We have previously been advised that LB Bromley did not pursue Article 4 Directions because the Secretary of State invariably over turned them. In 2016 we submitted a Freedom of Information request on the number of Article 4 directions that were overturned by the Secretary of State since the changes to PDR were first introduced in 2013. Overall, 50 Article 4 Directions had been made for Class O development up to 2016, and only 8 had been cancelled or modified, 5 of these in Greater London. We would therefore argue that the prospects of a successful Direction are rather greater than what may have been previously thought.

We strongly urge the Council to use every method available to them, be that Article 4 Directions, Conservation Area or other, to ensure developments and variations must be decided by a planning committee to ensure that local amenity is protected and the borough continues to promote appropriate good quality development.

Our Associations are not against upward development per se, however we are concerned that a permitted development will allow developers to do what they want and this may not necessarily be of benefit to the community, like the office to residential permitted development, which has seen virtually all of the office space in Beckenham having rights to convert, providing in some cases questionable standards of accommodation. It is essential that development in Beckenham and across the Borough is subject to the scrutiny of the Council's planning committees.

Beckenham Town Centre Conservation Area Appraisal

You may not be aware that the Beckenham Town Centre Team (TCT) initiated and has been working on a Conservation Area Guide for Beckenham Town Centre. Members of the TCT, which includes both our Association's, the Beckenham Society, Beckenham Business Association and the Park Langley Residents' Association have all contributed (from walk arounds with Bromley's Conservation Officer, research, photography, suggested good practice etc). We are really pleased with Beckenham Town Centre Conservation Area Appraisal, and hope this is a stepping stone to developing a Conservation Area Guide for Beckenham Town Centre. CCARA and WBRA support this appraisal and hope it is adopted by the committee.

Yours Sincerely

Chloe-Jane Ross, Chair, Copers Cope Area Residents' Association Marie Pender, Chair, West Beckenham Residents' Association Alan Old, Committee Member for Planning, Copers Cope Area Residents' Association