

## **Section '4' - Applications recommended for REFUSAL or DISAPPROVAL OF DETAILS**

**Application No :** 17/03022/FULL1

**Ward:**  
**Bickley**

**Address :** 55 Liddon Road Bromley BR1 2SR

**OS Grid Ref:** E: 541443 N: 168874

**Applicant :** Mr J Green

**Objections :** YES

### **Description of Development:**

Erection of additional floor to provide 6 additional residential flats (2 no. two bedroom and 4 no. one bedroom). External elevational alterations to the existing building include new windows, doors, in-set balconies and the formation of a roof terrace. Alterations to the parking layout, provision of refuse store at ground floor level and internal stair with bicycle storage and removal of existing staircase to the rear of the existing building.

### **Key designations:**

Biggin Hill Safeguarding Area  
London City Airport Safeguarding  
River Centre Line  
Smoke Control SCA 12  
Smoke Control SCA 13

### **Proposal**

The proposals comprise:

- Erection of additional storey to provide 6 residential flats

The existing flat roofed building is 6.22m tall and the proposal would increase the height of the building (to flat roof) to 9.59m high.

The additional floor of residential accommodation would have a flat roof which would provide communal amenity space and which would be surrounded by frameless glass balustrading. Roof access would be provided by way of a zinc-clad structure set within the roof terrace which would itself be 2.6m high, projecting above the surrounding parapet by 2.28m.

The roof terrace would be set back from the main front elevation by approx. 2.66m while extending almost up to the rear (southern) and flank elevations of the building below. The fenced-off section of the roof terrace would include 2 void openings to second floor balconies below.

Internally, the additional floor would provide 4 no. one bedroom and 2 no. two bedroom flats.

The application documents include a revised car parking layout (A-PLANNING-P-XXPROPOSED REV C) which shows the provision at the rear of the site of 5 no. car parking spaces, with 12 frontage spaces. Cycle stands would be provided within the hallway and a refuse store integral to the ground floor would be provided, accessed via the side access road, with doors opening inwards.

- Elevational alterations

The existing elevations would be remodelled to include the installation of new flank, front and rear window openings, external brick cladding and timber refuse doors and communal front entrance doors.

- Refuse store and internal bicycle storage area

The proposal includes the formation of an integral/internal refuse store within the existing ground floor of the building, which would be accessed via inward opening doors from the side vehicular accessway.

The internal staircase and hall way would be reconfigured, to include a ground floor entrance hall leading to the existing first floor and proposed second floor accommodation. Secure cycle parking is proposed to be provided within this entrance hallway.

- Removal of existing staircase to the rear

The existing rear staircase which leads from the parking area to the first floor of the building would be removed.

#### Site and surroundings

The application site is located on the southern side of Liddon Road, to the north of the gas holder station. The building is two storey with a flat roof. The property is served by a gated access from Liddon Road with parking to the front and rear of the premises, with the rear parking area accessed via a narrow access road leading between the host property and No. 27 to the north west. The access roadway is approx. 2.9m wide.

The site lies within a predominantly residential area to the north with commercial/industrial buildings to the south, east and west. The residential area is characterised by terraced dwellings with shallow front gardens. Liddon Road terminates to the north west of the site where there is an access to the rear of a large school site and a car park serving the school/former adult education centre sites.

The host building is in office use on the ground and first floors. While residential prior approval has been granted for the conversion of the ground and first floors from office to a total of 11 flats, this has not been implemented (16/04433/RESPA). The more recent planning history of the site is summarised below.

#### **Consultations**

Nearby owners/occupiers were notified of the application and a number of representations were received. The comments received can be summarised:

- All other residential dwellings are two storeys high and the new development will be out of character
- Parking in Liddon and Canon Roads is already at full or over capacity
- The entrance to the new primary school is in Liddon Road and the increase in traffic and parking will make it impossible for neighbouring residents and commercial properties to move and park
- Insufficient parking
- Increased congestion and impact on pedestrian and road safety
- Using the land to provide single flats where starter homes and houses are needed is very short-sighted
- The proposal, in conjunction with other proposed developments, would almost double the number of vehicle on the street

- The proposal refers to the reduction in parking on street associated with the current employees, but the extra on-street parking is generally associated with other businesses, not that at the application site
- The proposed parking spaces are not large enough for most models of car
- Where will visitors park?
- The type of accommodation will not be in keeping with the general pattern of residential properties i.e. mostly terraced housing
- These proposals are resulting in companies being kicked out to convert into homes
- Liddon Road/Homesdale Rad has a history of factory/industrial work which is being listed
- Loss of privacy to rear gardens of Canon Road properties
- Increase in noise associated with the residential windows and balconies and the use of the roof terrace
- A proposal for 19 flats was refused on the basis of impact on parking
- The proposed flats are too small
- Impact on existing residents will be intolerable
- Loss of office space in a good location, leading to loss of employment within the borough

Comments in support of the application have been received although it is noted that the addresses supplied are of the application site. The comments in support state:

- The business has to leave because of the business rates attracted by the property rather than because of housing
- Instead of being an eyesore the building will become a desirable residential development.
- The existing company can operate vans and vehicles from the premises on a 24/7 basis
- The proposal will provide affordable houses with good transport links
- The proposal would stop the articulated lorries from accessing the street
- The objections are based on residents being concerned they will lose free parking at the site overnight and at weekends.

#### Technical comments

Comments from a technical highways perspective raise concerns regarding the practicality and size of the parking area at the rear of the building, commenting that manoeuvring would be difficult particularly for parking bays 16 and 17. There are no objections in principle but the site lies in a Low (Very Poor) PTAL area and within the Bromley Town Centre CPZ where there is limited parking available.

If permission is granted future residents of the development should not be eligible to apply for parking permits.

It is noted that the refuse storage area looks small for a development of 17 units (Waste Services comments have been sought).

The proposal should incorporate cycle parking at a level of 19 spaces to serve the development as a whole.

Comments received from Environmental Health (Housing) state that from the submitted and scanned plans a number of the bedrooms look too small to be considered viable habitable rooms but it has not been feasible to determine the actual room sizes from the available documents. If the bedrooms are of an adequate size there are no objections, so long as the development meets or exceeds building regulations for fire separation,

insulation and thermal efficiency along with means of escape in case of fire and sound proofing between units.

The Environment Agency did not comment on the application.

### **Planning Considerations**

The application falls to be determined in accordance with the following policies of the Unitary Development Plan:

BE1 Design of New Development  
H1 Housing Supply  
H3 Affordable Housing  
H7 Housing Density and Design  
H9 Side Space  
H12 Conversion of non-residential buildings to residential use  
ER7 Contaminated Land  
ER10 Light pollution  
T3 Parking  
T7 Cyclists  
T18 Road Safety

SPG No.1 - General Design Principles  
SPG No.2 - Residential Design Guidance  
Affordable Housing SPD

The Council is preparing a Local Plan. The submission of the Draft Local Plan was made to Secretary of State on 11th August 2017. These documents are a material consideration. The weight attached to the draft policies increases as the Local Plan process advances.

Draft Policies of relevance to the determination of this application comprise:

Policy 1 Housing Supply  
Policy 2 Provision of Affordable Housing  
Policy 4 Housing Design  
Policy 8 Side Space  
Policy 10 Conversion of non-residential buildings to residential use  
Policy 30 Parking  
Policy 32 Road Safety  
Policy 37 General Design of Development  
Policy 118 Contaminated Land  
Policy 119 Noise Pollution  
Policy 122 Light Pollution

London Plan (2015)

Policy 3.3 Increasing Housing Supply.  
Policy 3.4 Optimising Housing Potential  
Policy 3.5 Quality and design of housing developments  
Policy 3.8 Housing choice  
Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising carbon dioxide emissions  
Policy 5.3 Sustainable design and construction  
Policy 5.7 Renewable energy  
Policy 5.9 Overheating and cooling  
Policy 5.10 Urban greening

Policy 5.11 Green roofs and development site environs  
Policy 5.12 Flood risk management  
Policy 5.13 Sustainable drainage  
Policy 5.14 Water quality and wastewater Infrastructure  
Policy 5.15 Water use and supplies  
Policy 5.16 Waste self-sufficiency  
Policy 5.17 Waste capacity  
Policy 5.18 Construction, excavation and demolition waste  
Policy 5.21 Contaminated land  
Policy 6.9 Cycling  
Policy 6.13 Parking  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.6 Architecture  
Policy 7.15 Reducing and Managing Noise.  
Policy 8.2 Planning obligations  
Policy 8.3 Community infrastructure levy

Housing: Supplementary Planning Guidance. (2016)

National Planning Policy Framework

### **Planning History**

The planning history of the site is summarised:

99/03260/FULL1 - Alterations to 55, Liddon Road to incorporate LEB sub-station into building for use as ancillary storage area - Planning permission GRANTED.

07/01053/FULL1 - Elevational alterations/enclosed staircase at rear and conversion into 3 self-contained (Class B1) units - Planning permission GRANTED.

16/04433/RESPA - Change of use of from Class B1(a) office to Class C3 dwellinghouses to form 11 dwellings (56 day application for prior approval in respect of highways, contamination, flooding and noise under class O, part 3 of the GPDO) - Prior approval GRANTED.

17/01567/RESPA - Change of use of from Class B1(a) office to Class C3 dwellinghouses to form 19 apartments (56 day application for prior approval in respect of highways, contamination, flooding and noise under class O, part 3 of the GPDO) - Prior approval REFUSED on the grounds:

"In the absence of adequate car parking and refuse and cycle storage provision, the proposal will generate additional pressure on the existing parking demand in the area, resulting in an unacceptable increase in the demand for on-street car parking, contrary to Policy T3 of the Unitary Development Plan, the National Planning Policy Framework and draft Local Plan Policy 30. The proposal is therefore not considered to comply with Class O.2(a) of the General Permitted Development Order (2015) as amended."

17/02905/RESPA - Change of use of from Class B1(a) office to Class C3 dwellinghouses to form 11 flats (56 day application for prior approval in respect of highways, contamination, flooding and noise under Class O, Part 3 of the Town and Country Planning (General Permitted Development)(England)(Amendment) Order, 2015).

This application for residential prior approval was submitted along with this current planning application and the submitted design and access statement refers to the layout at ground and first floors tallying with that proposed under 17/02905. Prior approval was refused on the grounds:

"As a result of inadequate parking layout exceeding the maximum standards set out in Policy T3 and Appendix II of the Unitary Development Plan, the proposal will generate additional pressure on the existing parking demand in the area, resulting in an unacceptable increase in the demand for on-street car parking, contrary to Policy T3 of the Unitary Development Plan, the National Planning Policy Framework and the draft Local Plan Policy 30. The proposal is therefore not considered to comply with Class O.2(a) of the General Permitted Development Order (2015) as amended."

It is noted that at the time the application for prior approval was being determined, this current planning application had been submitted but was as then undetermined.

### **Conclusions**

The main issues in the determination of this application are the impact of the proposal on the visual and residential amenities of the area, along with the highways impacts of the development. It also falls to consider whether the proposal would provide residential accommodation of a satisfactory standard of residential amenity.

The current scheme adopts the internal stair configuration, refuse store etc. that was proposed under the residential prior approval application which was refused under reference 17/02905/RESPA. Due to the sequence of application submissions, and the refusal of the most recent residential prior approval Members will note that the layout of the access to the proposed second floor and the provision of an internal integral refuse store on the ground floor would not tally with the original prior approval which was granted under reference 16/04433/RESPA. The approach with applications under Class O of the GPDO is that the application broadly seeks confirmation that the provision within the existing structure of a specified number of residential units would be acceptable in terms of transport and highways impacts, contamination and flood risk impacts and the impact of noise generated by nearby commercial premises upon prospective occupants.

Under reference 16/04433/RESPA prior approval was granted for the formation of 11 residential units within the constraints of the existing building without that formation being tied to a specified internal layout. As such, and taking into account the details within this application (Transport Statement and Design and Access Statement) it is considered that if permission was to be granted for this proposal, it would be in conjunction with the conversion of the lower existing floors from office to residential rather than in conjunction with the retained ground and first floor office accommodation. While the office conversion previously approved under the requirements of Class O of the GPDO has not been implemented, there can be a reasonable expectation that that change of use will be implemented.

### Principle of development

Policy 3.4 of the London Plan seeks to optimise housing potential, taking into account local context and character, design principles and public transport capacity.

Policy H7 of the Unitary Development Plan sets out criteria to assess whether new housing developments are appropriate subject to an assessment of the impact of the proposal on the appearance/character of the surrounding area, the residential amenity of adjoining and future occupiers, car parking and traffic implications and community safety and refuse arrangements.

It is considered that the residential use of the ground and first floors has been established and therefore that the provision of further residential accommodation within the unit may be acceptable in principle subject to an assessment of the impact of the proposal on the appearance/character of the surrounding area, the residential amenity of adjoining and future residential occupiers, car parking and traffic implications, sustainable design and energy, community safety and refuse arrangements.

#### Impact of the proposal on the visual amenities, character and appearance of the area and the street scene

Liddon Road is generally residential in character with the prevailing pattern of development comprising Victorian terraced dwellings, with the exception of the application site and the offices/industrial buildings to either side of it. Each of these commercial premises is of differing design. The height of the commercial buildings steps up from the low building at No. 53 to the squat two storey host building and the slightly higher two storey building at No. 57, all of which are flat roofed.

A unifying feature it is the two storey height of the buildings, taking into account the character of Liddon Road as a whole, and that of the part of Canon Road which lies perpendicular to the southern street frontage. It is acknowledged however that the height of the flat roofed commercial buildings is not completely consistent. The use of brick is characteristic of the commercial buildings, either as the main facing material or as a strong contrasting feature, while the residential dwellings opposite the site are generally rendered with brick flank elevations.

In terms of the materials used in the proposed elevational alterations it is considered that the proposal complements the materials used in the existing and adjacent buildings. The material proposed to be used in the construction of the second floor and the elevational alterations to the ground and first floors would be consistent with the host building and the prevailing palette of local materials. It is also considered that, leaving aside the relationship of the host building with its surroundings, the appearance of the building would be individually of high quality and attractive to look at.

However, it falls to be considered how the proposal would impact upon the visual amenities of the street scene and the area in general, assessing the relationship between the resultant building and its surroundings. The elevational alterations in conjunction with the increased height of the building would result in an appreciably three storey appearance which would be uncharacteristic of the prevailing pattern of development in the locality. It is acknowledged that the neighbouring building at No. 57 is slightly higher than the existing building at the application site. However, that property is set at the very end of the row of commercial properties and as a consequence has a lesser prominence in the street scene. In addition the main bulk of that building is set to the rear of its footprint and the layout of fenestration and other detailing results in a definite two storey appearance.

In contrast, the proposal would result in the enlarged/altered building having a more vertical visual emphasis, with the three storey height being immediately apparent and the vertical brick piers in relation to narrow portrait windows at ground, first and second floors heightening the vertical visual emphasis of the structure. It is noted that the extent to which the proposed building would visibly juxtapose with the nearby residential two storey dwellings would be limited as a consequence of its position and the layout of the street. The front elevation of the building broadly faces the flank elevation of the Canon Road terrace and that street junction itself, which tends to increase the extent to which the building is appreciable from the wider public realm. The building would be clearly visible within the street scene and from the junction of Canon Road with Liddon Road and by passing traffic, including that leading to the nearby primary school. It would be viewed in

conjunction with the much more squat building at No. 53 and the visibly two storey building at No. 57.

Taking the above into account, while the materials used for the proposal would complement the host and neighbouring buildings, the increased height of the building and the external appearance of the property would appear unduly bulky and overdominant in the context of the street scene and the prevailing pattern of development within the residential street, characterised by modest two storey residential dwellings.

#### Impact of the proposal on residential amenity

Concerns have been expressed regarding the impact of the proposal on residential amenity, including privacy. The application building lies opposite and approx. 18m to the side elevation of the Canon Road terrace. The proposal would include the provision of a large roof terrace. It is not considered however that the proposal would have a detrimental impact on residential amenity as there is sufficient separation between the terrace and neighbouring dwellings and the field/angle of vision from the terrace area (which is set back from the main front elevation) would be limited.

The use of the terrace could lead to noise and disturbance at an elevated position. However, it is not considered in view of the siting of the building, the height of the terrace and the context of the site, with unfettered business and industrial units adjacent, that the neighbourly use of the terrace would have a significant impact on the residential amenities of neighbouring properties.

The majority of the resultant building would be approx. 3m higher than the existing building (excluding the small stair access and the glazed balustrade). It is not considered that this increased height would have an unacceptable impact in terms of loss of light/outlook or overdominant visual impact on nearby residential windows as a result of the siting of the building in relation to the flank elevation and gardens of the nearest terrace in Canon Road, along with the distance between the development and the nearest residential dwellings.

#### Quality of the residential accommodation

Policy 3.5 of the London Plan (2015) Quality and Design of Housing Developments states the minimum internal floor space required for residential units on the basis of the level of occupancy that could be reasonably expected within each unit. This has been updated within the DCLG Technical Housing Standards Document (2015).

Policy BE1 in the Adopted UDP states that the development should respect the amenity of occupiers of future occupants. Draft Policy 4 requires that development shall meet the minimum space standards and that there is the provision of sufficient external, private amenity space that is accessible and practical.

The design and access statement submitted with the application referred to the individual units and detailed the size and type of flat provided. Subsequently amended plans have been received (16/10/17) revising this information and changing the mix of units to be provided from:

2 two bedroom (3 person)  
3 one bedroom (2 person)  
1 one bedroom (1 person)

to:

3 two bedroom (3 person)



- 1 one bedroom (2 person)
- 2 one bedroom (1 person)

The one bedroom, 1 person units each incorporate a separate shower room.

On the basis of the amended information the size of the individual units would meet the minimum space required by the Technical Housing Standards and the rooms sizes would similarly just meet the minimum in most cases (with regards to the double bed spaces).

The Housing SPG refers to private open space, stating that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm for each additional occupant (Standard 26). The explanatory text refers to exceptional circumstances "where site constraints make it impossible to provide private open space for all dwellings" stating that "a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement."

The individual balconies of flats 2.01, 2.02 and 2.06 fall below 5sqm and there is no private amenity space for 2 of the remaining 3 flats. Flat 2.04 is referred to by the applicant as providing 5sqm amenity space although the submitted drawing appears to show the space as falling short of that dimension, and it is also noted that the flat is described by the applicant as a 3 person flat which would lead to a higher requirement for private amenity space.

The applicant refers to the proposed roof terrace in mitigation of this shortfall, and refers also to the constraints of the existing building. It is acknowledged that the roof terrace would provide some external amenity space, which may also serve the ground and first floor flats if the prior approval is implemented. However the roof terrace would not have the same level of utility and practicality of use in contrast to private directly accessed amenity space, and the potential use of that space by a large number of flats within the building as a whole would tend to undermine its quality and value to provide private outside space. It is not considered that the proposal would provide residential accommodation of a high quality, nor would it meet the 'exceptional circumstances' provisions of the Housing SPG referred to above, in that not only is there inadequate private amenity space, but also this shortfall cannot be provided within the proposed flats which are shown to meet rather than exceed the technical housing standards space requirements. The shortfall in amenity space is not related to a corresponding increase in the GIA of the units with a lack of, or without any, external amenity space.

#### Highways impacts

From a technical highways perspective it is noted that the site is located within a low PTAL area and while there is no objection to the change of use, it is important to ensure that the proposal will not have an undue impact on the parking demand as existing within the immediate area. The proposed parking layout is considered unacceptable in view of the convoluted manoeuvres necessary to access and leave the parking bays at the rear of the property.

There is an extant prior approval for the conversion of the ground and first floors of the property to provide a total of 11 units (ref: 16/04433/RESPA) although it is noted that the internal layout and refuse storage associated with that prior approval does not tally with the internal stair position and refuse storage (for example) of this application. While this prior approval has not been implemented, the planning history of the site is a material planning consideration. The parking layout of that approved scheme provided sufficient parking at the front of the property so as to limit the extent to which the rear parking area

would have been heavily relied upon to serve a day to day function, and fewer spaces were proposed to be provided at the rear in any case.

Where prior approval was granted in 2016 under reference 16/04433 for the conversion of the ground and first floors of the building to residential with a parking layout that included 5 no. rear spaces and 9 no. front spaces, that development related to 11 flats where the majority of car parking spaces were proposed to be provided on the frontage. It was therefore considered likely that the spaces at the rear would have a lesser import and would be less intensely used as a consequence of their siting and the provision of an adequate number of frontage car parking spaces.

Prior approval was recently refused for a separate application for 11 units (ref: 17/02905/RESPA). Approval was refused in part as a result of concerns relating to the inadequate parking layout - concerns which have been repeated in technical comments received in respect of this application. Further concern was expressed at the number of spaces then being shown to be provided at the rear, with significantly more spaces being provided in total and in conjunction with the residential conversion of the ground and first floors.

As a consequence of the total potential number of residential units at the application property it is of concern that the parking layout at the rear appears unacceptable in terms of providing adequate manoeuvring space so that if all spaces are occupied, vehicles can easily and safely turn within the site and avoid lengthy reversing movements in a space of quite constrained dimensions. The internal refuse store would be accessed from the narrow side passageway which also leads to the rear car parking area.

The provision of on-site car parking is considered important in view of the low PTAL rating for the site. It is noted that the Transport Statement agrees that the site lies on the boundary of a PTAL of 1a-2 which would be considered low.

If permission is granted for this development and it is implemented alongside a permitted development change of use of the ground and first floors of the property, the resultant 17 unit residential development would result in a more intense use of the rear parking area and narrow side access than would have been anticipated or likely in a straightforward conversion of the existing building to residential use. It is noted that a residential prior approval application which sought approval for the conversion of the ground and first floors to 19 units was refused on the grounds that the proposed car parking, refuse and cycle storage would have been inadequate, leading to an unacceptable increase in demand for on street parking. The frontage car parking area has increased from that granted prior approval under reference 16/04433/RESPA to 12 spaces currently shown, rather than the 9 spaces considered acceptable.

While concern has been expressed regarding cycle parking, this relates to the disparity between the site layout granted approval under 16/04433 and that currently proposed, where the previous scheme had outside cycle parking provision and refuse storage areas. In this case, the application shows the provision of an internal cycle store accessed via the narrow side drive and stacking cycle stands in the ground floor hallway. A total of 16 stands are proposed to be provided, which falls short of the 19 cycle spaces referred to by the highways engineer, taking into account the need for additional cycle storage where units are proposed to be two bedroom. If permission is granted for the scheme it would be appropriate to impose a condition relating to the provision of cycle storage.

Taking into account the highways concerns regarding the adequacy of the parking layout and the planning history of the site it is not considered that the proposal, which would potentially lead to a total of 17 flats on site, would provide on-street parking of a

reasonable and attractive layout to serve the needs of the prospective occupants, in the context of the site's low public transport accessibility and existing parking demand.

#### Loss of business

Concerns have been raised regarding the impact that the residential conversion of offices is having on employment and business uses in the borough. If this were a full planning application including the conversion of the ground and first floors this would be a material consideration in the determination of the application, as would the planning policies which seek to safeguard employment sites in the locality. However, the current application seeks a second floor extension above the existing ground and first floors and does not include the residential conversion of the lower floors. As such the potential implementation of the change of use of the ground and first floors which benefits from permitted development subject to prior approval is not material to the consideration of this specific proposal.

#### Affordable Housing

Policy H2 states that affordable housing will be sought on all housing sites capable of providing 10 dwellings or more. On all sites at or above this threshold negotiations will take place to determine the number of affordable dwellings to be provided.

Paragraph 6.3 of the Bromley Housing Supplementary Planning Document states that where the Council consider that a site has been artificially sub- divided in order to avoid the application of the affordable housing policy, the policy will be applied across the entire site and any sub-phase of the site.

In this case, application 16/04433/RESPA which was granted prior approval proposed 11 apartments. If implemented with this application, the number of residential units would total 17 and there would be no affordable housing contribution.

#### Summary

It is acknowledged that the proposal would provide 6 no. additional residential flats and this does provide some weight in favour of the proposal. However, the proposed residential development would provide accommodation of a satisfactory standard of amenity for prospective occupants.

It is considered that the proposal would have a detrimental impact on the character and appearance of the area, resulting in a development out of character with the pattern and grain of surrounding spaces and the predominantly two storey character of built development in the locality.

The parking layout proposed to be provided would be inadequate to serve a cumulative residential development of the scale proposed, taking into account the number and mix of residential units, the low public transport accessibility of the site and the constrained size of the rear car parking area and vehicular access.

Background papers referred to in the preparation of this report comprise all documents on files refs. 16/04433/RESPA, 17/01567/RESPA, 17/02905/RESPA and 17/03002/FULL1 excluding exempt information.

**As amended by documents received on 16.10.2017 08.09.2017**

**RECOMMENDATION: APPLICATION BE REFUSED**

**The reasons for refusal are:**

- 1** The proposal by reason of its height, external appearance and siting would have a detrimental impact on the visual amenities of the area, resulting in an overdominant and incongruous development out of character with the prevailing two storey pattern of development in the locality and thereby contrary to Policies BE1 and H7 of the Unitary Development Plan, Policies 4 and 37 of the Draft Local Plan, Policies 7.4 and 7.6 of the London Plan.
- 2** The proposal would provide residential accommodation of an unsatisfactory standard of amenity for prospective occupants, taking into account the paucity of internal space and external private amenity space, thereby contrary to Policies BE1 and H7 of the Unitary Development Plan, Policies 4 and 37 of the Draft Local Plan and Policies 3.5 and 7.6 of the London Plan.
- 3** In the absence of a high quality parking layout that is easy and safe to use, the proposal would generate additional pressure on the existing parking demand in the area, resulting in an unacceptable increase in the demand for on-street car parking, contrary to Policy T3 of the Unitary Development Plan, the National Planning Policy Framework and the draft Local Plan Policy 30.