

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

Application No : 17/03525/FULL1

Ward:
Clock House

Address : 13 Blakeney Avenue Beckenham BR3
1HH

OS Grid Ref: E: 536902 N: 169964

Applicant : Mr Jawaheer

Objections : YES

Description of Development:

Conversion of single family dwelling into 2 x 1 bedroom and 1 x 2 bedroom flats.

Key designations:

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Open Space Deficiency
Smoke Control SCA 12

Proposal

Planning permission is sought to convert the existing single family dwelling into 2 x 1 bedroom and 1 x 2 bedroom flats. The application site comprises a two storey semi-detached property, which has been extensively extended in recent months, including the construction of single storey rear extensions and rear dormer extensions under planning reference: 17/01744/FULL6. According to the submitted plans the property is as a 7 bedroom dwelling. The proposal plans to re-configure the existing property to form two one bedroom flats at ground and first floor and a two bedroom flat at first and second floor level. The revised proposed plans state that the conversion would provide parking for 2 off street spaces along the existing hardstanding to the front of the property.

The application site is a two storey semi-detached property located on the north side of Blakeney Avenue, Beckenham. The surrounding area comprises of semi-detached period properties, with some examples of post war development nearby. The application site has a PTAL rating of 3 (on a scale of 1-6 where 6 is the most accessible).

Consultations

Nearby owners/occupiers were notified of the application and representations were received which can be summarised as follows:

- Parking spaces are very limited in this road because we are located close to two train stations

- The sub-division of this single household into 3 separate dwellings is in breach of the restriction of the previous application
- There is no way three cars could park in front of 13 Blakeney Avenue, owned by three dwellings, without requiring multiple shuffling of the cars
- The curb in front of the property is less than half of the width of the property
- This would affect road safety for children playing, access for emergency vehicles and refuse lorries
- The number of cars would not possibly be accommodated via off-street parking
- There is already a difficulty with people parking in the road and emergency service and refuse vehicles turning in the road
- Dividing such a property into three separate dwellings would significantly affect the character of a street that is predominately made up of single household properties
- There is insufficient room to move cars onto a drive when there are other vehicles parked directly opposite due to the narrowness of the road
- The existing garage at 13 Blakeney Avenue is now in the process of being blocked up to accommodate yet another room
- The property has a reasonable sized garden for one property, however, this will not work if it is split into 3
- 3 flats will mean the site is overdeveloped
- Several other residents in the street have had applications for crossovers refused
- There is only a drop kerb for one car
- The two bed flat contains bedroom which appears to be below minimum space standards
- The bedroom at the front of the building is being reported as 12 sqm, but floor area with a ceiling height of less than 1.5m cannot be included in calculations of acceptable floor area
- It appears from the cross section drawing that the floor area would be reduced by about a third if the area below 1.5m ceiling height is removed
- The resulting accommodation should provide a high quality living environment for intended occupiers
- The layout of the kitchen of two bed flat is next to a bedroom in the adjoining property, this would have a substantial impact on the quality of life of the occupiers of the adjoining property
- Policy H11 seeks to protect the loss of smaller family dwellings
- Council draft Policy 9 also seeks to resist the loss of small/medium family sized dwellings
- Both policies do not provide a definition what constitutes a small/medium sized dwelling
- Although many London Authorities class these types of dwellings as having an original foot print of 130-150m²
- The conversion would set an undesirable precedent what would make the conversion of other properties difficult to resist
- The comings and goings created by the conversion would also create undue noise and disturbance
- This would harm the living conditions of both immediate occupiers, contrary to Policy H11

- Based upon the mix, 5 covered and secure cycle parking spaces would be needed
- Allowing the house to become a multi-occupancy for the dwelling would set a precedent

Following the submission of additional parking information accordingly local residents were re-notified:

- How can you consider adding a possible 6-8 extra vehicles to use this road. This is, in my, and all other residents is ridiculous
- Survey completed at night, no account for daytime congestion due to commuters using the cul-de-sac as train station parking
- 8 spaces allocated at the turning area at the end of the road, this is a turning area for emergency vehicles, not a parking area
- To allow three for the 3 car access to no.13 parking, the remaining pavement will need to be dropped
- Monivea Road which is a turning off Blakeney Avenue is an un-adopted road, maintained by the residents who would not be happy with more cars being parked in their road
- No.13 is not a suitable development for this road and for the residents who live in it
- The house at No.13 doesn't have the space to provide parking to the front of the building for three cars so residents and visitors to the proposed flats would need on-street parking, which with 3 dwellings is potentially 3-6 cars.
- Commuter and commercial parking during the day adds to the pressure of parking in the area
- It is not clear why the survey was carried out on two week nights or the time scales- was it just a quick drive by at 5 am or was it over some hours
- I don't think that anybody in their right mind living in Blakeney Avenue or Moivea Road would choose to park their car in Blakeney Road given that many of the parking spaces are in potentially highly risky positions
- In fact the parking spaces towards the Blakeney Road end of Blakeney avenue are usually taken by residents of nearby houses in Blakeney Road because they are reluctant to park on Blakeney Road
- There have been numerous comments/objections from residents of Blakeney Road on the dangerous parking situation here
- The fact remains this is an inappropriate and unlawful development gotten to by circumvent tactics
- The second traffic survey adds little of substance to the application as a whole. The fact of the matter is that the proposal to convert the property into 3 flats is a serious overdevelopment of the property, totally out of character with all the other properties in the road
- The parking survey includes 4 'side by side' parking spaces at the end of Blakeney Avenue close to Rye Court. These however are not parking spaces - this is a turning area placed here so cars can turn without entering Rye court. Due to the lack of free spaces on Blakeney Avenue cars park here illegally. It is not clear from the survey why the survey

authors think it is appropriate to allocate half the turning area to parking - there are no marked bays here

- The road is always full of cars and quite often I cannot get out of my drive due to people parking opposite the drive (due to the fact the roads so narrow). Currently people generally only do that when the spaces at the top are full but if this went ahead, and each couple had a car each that could add Six cars to the mix and I essentially would have a nightmare just trying to carry out a basic function like parking
- I am here simply referring to the REVISED GROUND AND FIRST PLAN PROPOSED PARKING LAYOUT submitted on 11th October 2017 for this objection
- In this latest revised plan the developer proposes that two cars can fit onto the front drive where there is a 5m distance between the house and the pavement
- The idea that this is possible contradicts Lambeth Council's parking survey that the developer himself instructed. It is clear in that survey that the Council allow 2.5m for cars parked side by side as well as the 5m length
- This means in order to have two cars parked side by side there also needs to be a width of 5m. In the case of 13 Blakeney Avenue there is only a width of 4.76m which is not wide enough for two cars parked side by side. Therefore, as previously stated with the dropped kerb as it is, and there not being scope to drop the curb in front of the house where there is only 3.8m to the pavement, there is simply only room for one car to park legally on this driveway
- In the case of flats this is even more relevant because people in a family can ask each other to move their cars to shuffle about on a drive, even if by the Council's rules they shouldn't be parking two cars on the driveway. In the case of flats, it is not possible at any given hour of the day or night to ask a neighbour to move their car so you can fit yours onto or off the driveway.

Consultee Comments

Drainage: No objection

Highways: The site is an area of moderate PTAL (3) and there are already parking issues on this narrow road.

Previous application 17/01744/FULL6 was for part conversion of garage, single storey rear extension and rear dormer extensions to form habitable accommodation in the roofspace, but, this application is to convert this single family dwelling into 2 x 1 bedroom and 1 x 2 bedroom flats.

There is space to park 2 for a single dwelling but not enough area to accommodate 3 cars for 3 separate dwelling.

Also the site is at a fair distance from the shops and railway station. I am of the opinion that all occupiers will own a car, considering the non-availability of public transport and on street parking on the neighbouring streets the development would have a significant impact on the surrounding road network.

In short this application would lead to undue manoeuvring and additional pressure on neighbouring streets by 2 cars parked at inappropriate places, therefore I would raise objection to the proposal.

Revised Highways comments following submission of additional information:

Both parking layout and lack of parking / displacement of 2 cars are interlinked.

Blakeney Avenue is over stressed to an extent that residents are parking on the turning head at the end of cul de sac. Monivea Road is a narrow unmade road so the Council does not want to encourage additional parking due to lack of surface course as it would add to wear and tear. Also Blakeney Road is unsuitable for parking as it has sharp bends and any additional parking could add to road safety issues, additional parking should therefore not be encouraged.

All this can affect highway safety, the free-flow of traffic, access by emergency services; refuse collection and delivery of goods.

Environmental Health Pollution: No Objection

Planning Considerations

The application falls to be determined in accordance with the following policies:

National Planning Policy Framework (2012):

Chapter 7- Requiring Good Design

London Plan (2016) Policies:

- 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 net self-sufficiency
- Policy 5.17 Waste capacity
- Policy 5.18 Construction, excavation and demolition waste

Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
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 7.14 Improving Air Quality
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy

Mayor's Housing Supplementary Planning Guidance 2016

Unitary Development Plan (2006):

BE1 (Design of New Development)
H8 Residential Extensions)
BE7 (Railings, Boundary Wall and Other Means of Enclosure)
H1 (Housing Supply)
H7 (Housing Density and Design)
H8 (Residential Extensions)
H9 (Side Space)
H11 (Residential Conversions)
T1 (Transport Demand)
T3 (Parking)
T7 (Cyclists)
T18 (Road Safety)

Supplementary Planning Guidance 1 General Design Principles
Supplementary Planning Guidance 2 Residential Design Guidance

According to paragraph 216 of the NPPF decision takers can also give weight to relevant policies in emerging plans according to: The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
The degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given). As set out in paragraph 216 of the National Planning Policy Framework, emerging plans gain weight as they move through the plan making process.

The following emerging plans are relevant to this application.

Emerging Draft Local Plan (2016):

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 Policy 1 Housing Supply
Draft Policy 4 Housing Design
Draft Policy 8 Side Space
Draft Policy 9 Residential Conversions
Draft Policy 37 General Design of Development
Draft Policy 30 Parking
Draft Policy 32 Road Safety

Planning History

16/04172/HHPA-Single storey rear extension, extending beyond the rear wall of the original house by 6m, for which the maximum height would be 4m, and for which the height of the eaves would be 3m. (42 Day Notification for Householder Permitted Development Prior Approval)-Prior Approval Not Required- Date issued-12.10.2016

16/04834/PLUD-Construction of a ground floor 6x4.5m extension for which prior approval was determined under ref 16/04172/HHPA, construction of a two storey 3m extension and construction of rear dormers to form a loft room -LAWFUL DEVELOPMENT CERTIFICATE (PROPOSED)-Proposed Development is not Lawful- Date issued-29.11.2016

16/05521/PLUD-Construction of a ground floor 6m x 4.5m extension for which prior approval was not required under ref: 16/04172/HHPA, construction of a ground floor 3m extension and construction of rear dormers to form a loft room
LAWFUL DEVELOPMENT CERTIFICATE (PROPOSED)-Proposed Development is Lawful- Date issued-16.01.2017

17/01744/FULL6-Part conversion of garage, single storey rear extension and rear dormer extensions to form habitable accommodation in the roofspace. - Application Permitted- Date issued-15.06.2017.

Condition 5:

5. The additional accommodation hereby approved shall be used only by members of the household occupying the dwelling at 13 Blakeney Avenue; and shall not be severed to form a separate self-contained unit

Reason: In order to comply with Policy H8 of the Unitary Development Plan, to ensure that the accommodation is not used separately and unassociated with the main dwelling and so as to prevent an unsatisfactory sub-division into two dwellings.

Conclusions

The main issues relating to the application are the effect that it would have on the character of the area and the impact that it would have on the amenities of the occupants of surrounding residential properties.

The previous application was also determined at planning committee under planning reference: 17/01744/FULL6. It was considered appropriate by the committee that a condition was added (condition 5), as outlined above, stating that the approved shall be used only by members of the household occupying the dwelling at 13 Blakeney Avenue; and shall not be severed to form a separate self-contained unit. The resulting planning application now seeks planning permission to sub-divide the dwelling to form 2 x 1 bedroom flats and 1 x 2 bedroom flats, superseding the previous condition applied to permission 17/01744/FULL6.

Members should also be aware that there is an ongoing Enforcement Enquiry on the site, with any subsequent breaches to be dealt with under separate applications.

The main issues to be considered in respect of this application are:

- o Principle of Development
- o Standard of Residential Accommodation
- o Impact on Neighbouring residential properties
- o Highways/Refuse

Principle of Development

Housing is a priority use for all London boroughs and the Development Plan welcomes the provision of small scale infill development in the areas of stability and managed change provided that it is designed to complement the character of surrounding developments, the design and layout make suitable residential accommodation, and it provides for garden and amenity space. The National Planning Policy Framework (NPPF) states in Paragraph 49 that housing applications should be considered in the context of the presumption in favour of sustainable development.

The NPPF sets out in paragraph 14 a presumption in favour of sustainable development. In terms of decision-making, the document states that where a development accords with a local plan, applications should be approved without delay. Where a plan is absent, silent or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or specific policies in the Framework indicate development should be restricted.

The document also encourages the effective use of land by reusing land that has been previously developed (brownfield land), and excludes gardens from the definition of previously developed land.

Policy BE1 of the UDP outlines that the design of new development proposal will be expected to be of a high standard and layout, which should seek to be imaginative and attractive to look at, complement the scale, form, layout and

materials of adjacent buildings and areas and preserve the character of the street scene.

Policy H11 outlines that proposals for the conversion of a single dwelling into two or more self-contained residential units will be permitted provided that:

- The amenities of occupiers of neighbouring dwellings will not be harmed by loss of privacy, daylight or sunlight or by noise and disturbance
- The resulting accommodation will provide a satisfactory living environment for the intended occupiers
- On street or off street parking resulting from the development will not cause unsafe or inconvenient highway conditions
- The proposal will not lead to the shortage of medium or small sized family dwellings in the area

Furthermore, Policy 3.5 of the London Plan seeks to ensure that housing developments should be of the highest quality internally, externally and in relation to their context and their wider environment. In addition, development proposal should seek to protect and enhance London's residential environment and attractiveness as a place to live. In addition, London Plan Policies 7.4 and 7.6 seek to enhance local context and character, when assessing the overall acceptability of a proposal.

The main consideration in the assessment of this application is whether the principle of the conversion from a single family dwelling to flats is acceptable. The application site comprises of a semi-detached dwelling located on a road consisting of similar residential dwellings. There are no examples of flat conversions in this section of the street and the locality is that of suburban residential form. Therefore, concern is that the conversion to form three flats would result in a detrimental impact to the character of the surrounding area. This is supported by Policy BE1(i) of the Unitary Development Plan, which requires development to complement the form and layout of adjacent areas, and London Plan Policy 3.5 which requires all housing developments to take account of local physical context, character and density.

Having said this, the property is a large property which has been extensively extended. Therefore, the property is significantly larger than the other properties in the street. As such, if the property was occupied by a large family the increased comings and goings resulting from the number of separate households in the building and additional noise and disturbance to neighbouring occupiers would be comparable to that of a 7 bedroom dwelling. In addition, there are no external changes proposed under this application and the communal bins for the development would be sited along the side of the site. These arrangements would minimise the visual impact of the conversion on neighbouring properties. Moreover, considering the size of the dwelling the proposal would not lead to a loss of a small/medium single family dwelling. Therefore, it is considered that the principle of the conversion to flats is on balance acceptable.

Nevertheless, the character of the area is not determined solely in terms of visual matters as stated above. Therefore, Members will have to consider whether the

principle of the conversion will have an adverse impact on the physical context, character and density of the area; or whether the conversion, when taking into account the size of the property and comparable comings and goings from a large family dwelling, would be similar to that of three flats.

Standard of Residential Accommodation

Whilst the principle of the conversion may be considered acceptable an assessment of the proposed residential accommodation still needs to be considered.

Policy 3.5 of the London Plan and Nationally Described space standards states the minimum internal floorspace required for residential units on the basis of the level of occupancy that could be reasonably expected within each unit.

Moreover, Policy H11 of the UDP states residential conversions should provide a satisfactory living environment for intended occupiers. Whilst Policy BE1 in the Adopted UDP states that the development should respect the amenity of occupiers of future occupants.

A one bedroom, two persons flat should provide a minimum of 50sqm of habitable floorspace over 1 storey and 58 sqm if the floorspace is spread over two floors. Whilst a two bedroom three person dwelling over two storeys should provide a minimum of 70 sqm and should have at least one double (or twin) bedroom.

The submitted plans indicate that the two proposed one bedroom flats will have an internal floorspace in excess of 58sqm, compliant with the Government's Technical Housing standards and London Plan standards.

In terms of internal floorspace, the two bedroom flat would be approximately 70 sqm compliant with space standards. However, the two bedroom flat would fail to comply with all criteria set by the Government's Technical Housing Standards. The applicant has provided a cross section of the property showing the accommodation in the roof space. The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

The Government's Technical Housing Standards state that 'any area with headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage'. Discounting the area of floorspace less than 1.5m in height in the roofspace would mean that the double bedroom would be less than 11.5 sqm. The Technical Guidance goes on to state that a dwelling with two or more bedspaces has to provide at least one double (or twin) bedroom. The two bedroom flat would fail to provide a double bedroom, as the second bedroom would also be less than 11.5sqm. Therefore, the proposal would fail comply with the objectives of the Government's Technical Housing standards, Policy 3.5 of the

London Plan and UDP Policy H11, which seeks to provide, amongst other things, high quality internal residential accommodation.

Private Amenity Space

In addition, the Mayor's Housing Supplementary Planning Guidance (SPG) (March 2016) provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan (MALP), replacing the 2012 Housing SPG. The SPG provides guidance on Private Open Space stating a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. The application site already benefits from a rear garden, in excess of 30 sqm, which could be utilised for private amenity space, compliant with the Mayor's Housing SPG.

Impact on Neighbouring Residential properties

Policy BE1 seeks to ensure that new development proposals, respect the amenity of occupiers of neighbouring buildings and any future occupiers ensuring that their environments are not harmed by noise and disturbance or by inadequate daylight, sunlight or privacy or by overshadowing. This is supported by London Plan policy 7.6.

The proposal does not involve any external alterations. Therefore, the main consideration is whether the proposal would lead to a loss of amenity to neighbouring properties by way of noise and disturbance. As outlined above, the property could accommodate a large family. It is considered that the comings and goings of three flats would be comparable with that of a 7 bedroom single family dwelling. As such, no undue loss of amenity is considered to neighbouring residents in relation to comings and goings.

Objections have been raised in regards to the internal layout of the proposed 2 bedroom flat, in particular the possible noise pollution which may result from the kitchen of this property to the neighbouring occupiers of No.15. Whilst this is noted, no objection has been raised from an Environmental Health (Pollution) perspective.

Highways

Policy T18 of the UDP and Draft Policy 32 Road Safety states that the Council will consider as appropriate the potential impact on road safety and will seek to ensure road safety is not adversely affected. Furthermore, Policy H11 states that on street or off street parking resulting from the development should not cause unsafe or inconvenient highway conditions.

The site is located within an area of moderate PTAL (3) where there are already parking issues on this narrow road. The previous application on the site: 17/01744/FULL6 for part conversion of garage, single storey rear extension and rear dormer extensions to form habitable accommodation in the roofspace was not considered to be detrimental to Highway safety, but, this application is to convert this single family dwelling into 2 x 1 bedroom and 1 x 2 bedroom flats. There is

space to park 2 cars for a single dwelling, as there is scope to 'shuffle' cars along the front hardstanding in order for residents to park. However, the shuffling of parked cars for flatted accommodation is deemed to be inappropriate.

The revised ground and first floor proposed plan highlight the limitations/constraints of the site. The layout of the front elevation means that without parking the second car touching the corner of the front elevation the car would over-hang the curtilage of the site. As a result, this arrangement would cause a road safety hazard to both pedestrians and vehicles, by way of undue manoeuvring and the positioning of vehicles.

The applicant has submitted additional supporting information including two parking surveys undertaken on three week days at 05:00, 08:00, 10:00 and 18.30. The surveys indicate that Blakeney Avenue is considerably over stressed, while there is capacity on for on-street parking at Blakeney and Monivea Road.

Whilst the surveys suggest that there is capacity on surrounding roads it is the Council's view that the parking of additional cars on these roads would be to the detriment of highway safety and the free flow of traffic along these roads. As stated above, Monivea Road is a narrow unmade road where additional parking should not be encouraged due to lack of surface course, which would add considerable wear and tear on this unmade road. In addition, it is felt that additional parking along Blakeney Road should be avoided, when considering the bends in road, which would be detrimental to the general highway safety and free flow of traffic along this busy road.

Taking the above into account, it is considered that the unsatisfactory parking arrangements arising from the development would lead to undue manoeuvring and additional pressure on neighbouring streets. This would cause risk to traffic and pedestrian safety, contrary to Policy T18 of the UDP and Draft Policy 32 of Bromley's emerging draft local plan and Policy H11.

Refuse

The submitted plans indicate an area to the rear of the site for bin storage, which is considered to be acceptable.

Summary

Having had regard to the above, Members may therefore consider that whilst the principle of the conversion to flatted accommodation may be considered acceptable, the resulting residential accommodation from the conversion would fail to provide a high quality internal layout for future residents. Therefore, the provision of 1 x 2 and 2 x 1 bedroom flats would result in an overdevelopment of the site, contrary to Policy H11 of the UDP, London Plan Policy 3.5 and the Government's Technical Housing Standards. Furthermore, providing two off-street parking spaces would be inappropriate and would lead to undue manoeuvring and additional pressure on neighbouring streets by parking two cars on surrounding roads. Therefore, the proposed level of residential units would cause risk to traffic and pedestrian safety, contrary to Policy T18 and H11 of the UDP and Draft Policy 32

of Bromley's emerging local plan. Taking the above into account, Members may therefore consider that the resulting conversion would lead to an over-development of the site.

RECOMMENDATION: APPLICATION BE REFUSED

The reasons for refusal are:

- 1. The proposed conversion would lead to a poor standard of residential accommodation, resulting in an over-intensification of the site, contrary to Policy 3.5 of the London Plan (2016) and Policy H11 of the Unitary Development Plan (2006) and Draft Policy 9 of Bromley's Emerging Draft Local Plan (2016).**
- 2. The proposed parking layout is inappropriate for two cars, this would lead to undue manoeuvring and additional pressure on neighbouring streets by cars being parked surrounding roads, leading to a significant risk to traffic and pedestrian safety, by reasons of illegal or unsuitable parking and on-street manoeuvring, which would be prejudicial to the free flow of traffic conditions and general safety in the highway, contrary to Policy T18 of the Unitary Development Plan (2006) and Draft Policy 32 of Bromley's Emerging Draft Local Plan (2016).**

You are further informed that :

- 1 You are advised that this application may be liable for the payment of the Mayoral Community Infrastructure Levy under the Community Infrastructure Levy Regulations (2010) and the Planning Act 2008. The London Borough of Bromley is the Collecting Authority for the Mayor and this Levy is payable on the commencement of development (defined in Part 2, para 7 of the Community Infrastructure Levy Regulations (2010)). It is the responsibility of the owner and /or person(s) who have a material interest in the relevant land to pay the Levy (defined under Part 2, para 4(2) of the Community Infrastructure Levy Regulations (2010)). If you fail to follow the payment procedure, the collecting authority may impose surcharges on this liability, take enforcement action, serve a stop notice to prohibit further development on the site and/or take action to recover the debt. Further information about Community Infrastructure Levy can be found on attached information note and the Bromley website www.bromley.gov.uk/CIL**