

## **SECTION '2' – Applications meriting special consideration**

**Application No :** 17/05869/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 the existing dwelling into 2 dwellings.

### **Key designations:**

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

### **Background**

The application is being reported to Planning Committee due to the applicant exercising their right of appeal against the Council's non-determination of the application within the statutory period. It will therefore be necessary for Members to consider whether the application should be contested at Appeal or not.

### **Proposal**

Planning permission is sought to convert the existing single family dwelling into 2 dwellings. This includes a one bedroom dwelling and a 4 bedroom dwelling.

### **Location and Key Constraints**

The application site is a semi-detached property located on the north side of Blakeney Avenue, Beckenham. The property has been extended by way of single-storey rear extensions and a large dormer. 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).

It is noted that the building works permitted under various applications outlined below have been carried out. However, the works have not been carried out in accordance with the approved plans. These include an increase in ridge height and size of the 'L' shaped dormer and conversion of the garage into kitchen with two windows, change to some elevational alterations. These were applied for retrospectively under ref: 17/05492/RECON but this application was refused by Members.

### **Comments from Local Residents and Groups**

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

- o Repeating applications which have previously been refused.
- o The property was expanded under permitted development granted because it was going to be used as single family house. This has never been the case.
- o All building work has been completed. Building should be returned to its former self.

- o Use of the word 'dwellings' rather than 'flats' in the description. Members stated that flats were not acceptable in principle. Complaints made to the Ombudsman as Council Officers changed the previous refusal to read '3 flats not acceptable in principle'. There is clear intention to split the property and still have 3 units.
- o Issues with off-street parking. The area to the frontage is 4.76m deep not 5 metres back as described by the application. Previous refusal 17/03525/FULL1 relevant. The layout is inappropriate for 2 cars and would lead to undue manoeuvring and additional pressure on neighbouring streets by cars parked on surrounding roads. Prejudicial to highway safety.
- o Against original planning approval which was to remain as a single dwelling. Manipulation of planning regulations
- o Overdevelopment
- o 13 Blakeney has been overdevelopment and is an eyesore
- o Increased traffic/parking on a narrow road.
- o Drive is not large enough to accommodate the proposed cars. Overhanging footway.
- o Concerns about parking and pedestrian and highway safety.
- o History of the site should be taken into consideration.
- o Still proposes parking for two cars which the previous scheme was refused on.
- o Cllrs ruled against dividing the house in December 2017, they did not specify 2, 3 or 4 - they just said 'flats not acceptable in principle'. What is the difference between a flat, unit or dwelling.
- o Would change the character of the road, which is filled with families and children. Would set a precedent.
- o Increase parking stress
- o The parking surveys are inadequate.
- o The amendment application not determined, therefore the works retain the changes sought by this application must also be included on the description of this application.
- o Reduced number of units but rather than create horizontal sub-division associated with typical flatted conversion, the applicant has opted to half the property to create 2 houses. The prevailing plot width of the new dwelling would not reflect the plot width of other properties within the road. The diminutive windows and absence of a front door also detracts from the character of the proposed dwelling. Creates pressure to sub-divide the forecourt; however erection of boundary treatment between both proposed houses would restrict access to parking for one of the dwellings, reinforcing issues relating to inadequate plot width.
- o The previous application was refused because it would create a poor standard of accommodation. The reduction in the number of units would appear to address this concern.
- o Parking still a problem. Instead of two average cars, the applicants have included two small cars (one mini) on the front forecourt. This does not overcome concerns raised by vehicles overhanging the highway.
- o Committee said there is scope to fit 2 cars on the site but only in the context of a single dwelling, where the vehicles are in single ownership and cars can be shuffled along the site. The report notes this is not possible for a flatted development. This concern cannot be addressed in the context of any development which seek to convert the property into two or more units.
- o The unit within the main body of the house would have 5 bedrooms. This is large single dwelling and reasonable to assume the potential owner could own 2 vehicles.
- o Parking demand created by this development is very similar to the demand created by previous application for 3 smaller units.
- o The parking survey shows road capacity but not on Blakeney Avenue. The Council were critical of parking. This concern remains outstanding.

- o The vertical conversion of the property introduces new issues about plot division and compatibility with the prevailing streetscape.
- o Contrary to Policy BE1. This property is unattractive and out of keeping with the character of the road.
- o Parking survey suggests Monivea Road can be used for additional parking but this is an unadopted road whose maintenance is paid for by its residents not by council. What right does the council have to allow development which would push additional traffic onto a road it does not contribute to?
- o Blakeney Avenue has a unique character.
- o Contrary to point e of Policy 9 of emerging Local Plan relating to conversions. The conversion of this property would have a detrimental impact on housing choice with one fewer on the market. There are plenty of terraced houses but very few semi-detached houses.
- o Inaccuracies and misleading statements within the submitted design and access statement.
- o A condition was imposed under ref: DC/17/01744/FULL6 restricting the severance of the property. Whilst this is a new planning application it would appear contradictory if the Council were to stop a house being converted in one planning decision and then a house to be converted into flats in the next application.
- o Clear planning committee feel that flats are not acceptable in principle and would negatively affect the character of the street.
- o Bromley should be preserving larger family accommodation. Also understand Bromley have a secure 5 year housing supply and that there is no need for more flats by conversion.
- o Increase in noise and disturbance for neighbouring properties and area in general.
- o The 7 bedrooms in the existing house are poorly configured and a family would likely reconfigure the property into 4 bedrooms. This would limit the number of people.
- o Would not provide a good standard of accommodation and loft rooms would be cramped.
- o Loss of a family home
- o Does not provide good high-quality accommodation, with poor internal layout.
- o The residents of the one bedroom unit will have their kitchen overlooked by three of the first and second floor bedrooms.
- o The four bedroom flat does not provide high quality accommodation, with a single kitchen and 16sqm of lounge for 7 more residents. This would be very cramped.
- o Comments regarding authorised building works.
- o Form and density of the conversion would not match the rest of the street, typical occupancy of the street is 4/5 per house, whereas this development has an occupancy of 9.
- o Loss of amenity
- o Highly likely the study would be used as a double bedroom. Increasing occupancy to 12.
- o Loss of privacy
- o Overlooking
- o Side access currently secure, this would be accessible to accommodate new entrance. Reduce security of the area. No natural surveillance.
- o Refuse would be to the rear, however due to conversion of the front drive into 2 bays on collection days there is nowhere to put them. Issues with road safety.
- o Should be converted back into a family home and enforcement action taken.
- o Access very restricted to Blakeney Avenue and Monivea Road. This narrowness presents a safety issue that would be exacerbated by adding multiple families.
- o Service vehicles struggle to move within the road.

- o Parking survey ignores the fact Monivea Road is unmade and there would be no contribution to its maintenance. Residents of Monivea Road would suffer financially due increased wear and tear.
- o Inconsiderate parking by drivers on the road and blocking drives.
- o Parking survey is out of date and has non-current information.
- o Separation of this house into a 5 bedroom house, with a 1 bedroom annex does not meet planning standards for providing quality accommodation. Does not represent a quality accommodation. Will likely be used as a HMO dwelling.
- o Consideration of planning application 17/05492/RECON must be first made before any applications can be taken into consideration.
- o Not enough room for two cars on the frontage. The access is not big enough and cars would have to drive across the footway.

Objections have been raised to the building works and variations to the approved extension but these were subject to a separation application presented to Members under ref: 17/05492/RECON.

### **Comments from Consultees**

Highways: The site is located to the north of Blakeney Avenue. The development is in an area within a medium PTAL rate of 3 (on a scale of 0 - 6b, where 6b is the most accessible).

Two substandard off street parking would be offered via an existing vehicular access. 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. Therefore the existing crossover should be widened to allow two cars manoeuvre in and out of spaces in a more safe and convenient manner. This must be addressed.

The applicant has carried out 3 parking stress surveys on three separate time slots 08:00, 10:00 & 18:30 hours (Thursday October 19th 2017). The stress occupancy for the whole survey area ranged between 62% [08:00] and [18:30] 73%.

Whilst Blakeney Avenue itself has high demand for parking currently by Residents there is spare parking capacity at Blakeney Road and Monivea Road.

Similarly the night time parking survey carried out on Tuesday Sept 19th & Weds Sept 20th 2017 at 5:00am indicates again that the occupancy for the whole survey area ranged between 54% and 59%.and there are some spaces on Blakeney Avenue with some spare capacity on Monivea Road.

Whilst the surveys suggest that there is capacity on surrounding roads 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. Monivea Road is a narrow unmade road where additional parking should not be encouraged due to lack of surface course, which would add 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.

If minded to approve, please include the following with any permission:

CONDITON

H03 (Car Parking)

H22 (Cycle)

H29 (Construction Management Plan)

H32 (Highway Drainage)

## INFORMATIVE

### DI16 (Crossover)

Nonstandard informative - Street furniture/ Statutory Undertaker's apparatus "Any repositioning, alteration and/ or adjustment to street furniture or Statutory Undertaker's apparatus, considered necessary and practical to help with the modification of vehicular crossover hereby permitted, shall be undertaken at the cost of the applicant

### **Policy Context**

Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

According to paragraph 216 of the NPPF decision takers can also give weight to relevant policies in emerging plans according to:

- o The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- o 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
- o 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).

The Council is preparing a Local Plan. The submission of the Draft Local Plan was subject to an Examination In Public which commenced on 4th December 2017 and the Inspector's report is awaited. These documents are a material consideration. The weight attached to the draft policies increases as the Local Plan process advances.

The development plan for Bromley comprises the Bromley UDP (July 2006), the London Plan (March 2016) and the Emerging Local Plan (2016). The NPPF does not change the legal status of the development plan.

National Planning Policy Framework (2012):

Chapter 7- Requiring Good Design

London Plan 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

#### Unitary Development Plan

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)

#### Emerging Local Plan

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

#### Supplementary Planning Guidance

Supplementary Planning Guidance 1 General Design Principles  
Supplementary Planning Guidance 2 Residential Design Guidance  
Mayor's Housing Supplementary Planning Guidance 2016

The Nationally Described Space Standards (2015)

#### **Planning History**

The relevant planning history relating to the application site is summarised as follows:

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 roof space. - Application Permitted-Date issued-15.06.2017.

Condition 3:

3. The development hereby permitted shall not be carried out otherwise than in complete accordance with the plans approved under this planning permission unless previously agreed in writing by the Local Planning Authority.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the visual and residential amenities of the area.

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 un-associated with the main dwelling and so as to prevent an unsatisfactory sub-division into two dwellings.

17/03525/FULL1 - Conversion of single family dwelling into 2 x 1 bedroom and 1 x 2 bedroom flats. Refused for the following reasons:

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).
3. The conversion of the host dwelling into 3 flats would be unacceptable in principle, out of character with the prevailing pattern, character and distinctive residential qualities of the locality, thereby contrary to Policies BE1 and H11 of the Unitary

Development Plan, Policies 9 and 37 of the draft Local Plan and Policies 7.4 and 7.6 of the London Plan.

The refusal of planning permission for the above application has now been appealed to the Secretary of State under ref: APP/G5180/W/18/3194638 and is pending consideration.

17/05492/RECON - Variation of Condition 3 of permission: 17/01744/FULL6 to allow increase in ridge height and size of the rear 'L' shape dormer and conversion of garage into kitchen with two windows, amendments revising the internal arrangements, elevational alterations and window fenestration. Refused for the following reasons:

1. The proposed rear roof extensions would cause significant harm to the character of the area, appearance of the host dwelling and the visual amenities of the street scene given its overall size, scale, massing and projection above the roof slope contrary to Policy BE1 and H8 of the Unitary Development Plan and Policies 6, 37 and 41 of the Emerging Local Plan.
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 the Emerging Local Plan .

The above application has been subsequently appealed and the outcome of this appeal remains outstanding.

### **Considerations**

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

- o Principle
- o Design
- o Standard of residential accommodation
- o Highways
- o Neighbouring amenity

### **Principle of conversion into flats.**

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 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.

As noted above, the application is a resubmission of planning ref: 17/03525/FULL1, which sought permission for the conversion of the existing dwelling into three flats. This application was refused in part for the following reason:-

3. The conversion of the host dwelling into 3 flats would be unacceptable in principle, out of character with the prevailing pattern, character and distinctive residential qualities of the locality, thereby contrary to Policies BE1 and H11 of the Unitary Development Plan, Policies 9 and 37 of the draft Local Plan and Policies 7.4 and 7.6 of the London Plan.

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. The communal bins for the development would be sited along the side/rear of the site. These arrangements would minimise the visual impact of the conversion on neighbouring properties. Moreover, considering the size of the dwellings the proposal would not lead to a loss of a small/medium single family dwelling.

The previous scheme was also for the conversion into three flats; however the current scheme is for the provision of two separate dwellings. Each application must be considered on its merits. This scheme provides a larger unit within the main body of the house and a smaller dwelling is housed within the side addition. Each unit would also benefit from their own front door. Therefore, it is considered that the principle of the conversion to flats is on balance acceptable.

Whilst it is acknowledged that representations have been made raising objections to the level of works conducted under permitted development, which have facilitated a larger footprint and possible conversion, the existing property is single dwellinghouse benefitting from permitted development rights. The applicant is entitled to use these rights at the time the dwelling is a single house whatever the longer term intentions. The level of movements associated with a larger dwellinghouse are not considered to be dissimilar to the level of movements associated with the two dwellinghouses and given the reduction in the number and units and the arrangement of two dwellings, which is more compatible with the character of the single dwellings with the street, it is considered that this proposal is acceptable and the current application has addressed previous objections.

## **Design**

No external alterations are proposed within the scope of this application, however it is noted that the proposed layout relies on development which was refused under ref: 17/05492/RECON which sought consent for the 'Variation of Condition 3 of permission: 17/01744/FULL6 to allow increase in ridge height and size of the rear 'L' shape dormer and conversion of garage into kitchen with two windows, amendments revising the internal arrangements, elevational alterations and window fenestration'. This application was subsequently refused for the reasons outlined above and those amendments do not

therefore benefit from planning permission. Notwithstanding this point, the above applications are now subject to outstanding appeals.

The proposal would result in the creation of a smaller one bedroom dwelling within the side addition. This represents a horizontal conversion of the existing property. Whilst this dwelling and its associated plot would be narrower than others within the street, the front door would be to the side and its appearance of a separate dwelling would unlikely be significantly appreciable. It would continue to have the appearance of a side extension and this would not therefore harm the character of the streetscene or area in general.

### **Standard of residential accommodation**

Policy H7 of the UDP sets out the requirements for new residential development to ensure a good standard of amenity. The Mayor's Housing SPG sets out guidance in respect of the standard required for all new residential accommodation to supplement London Plan policies. The standards apply to new build, conversion and change of use proposals. Part 2 of the Housing SPG deals with the quality of residential accommodation setting out standards for dwelling size, room layouts and circulation space, storage facilities, floor to ceiling heights, outlook, daylight and sunlight, external amenity space (including refuse and cycle storage facilities) as well as core and access arrangements to reflect the Governments National Housing Standards.

The London Plan makes clear that ninety percent of new housing should meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and ten per cent of new housing should meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The relevant category of Building Control Compliance should be secured by planning conditions.

Policy 3.5 of the London Plan and the Housing SPG (2016) Standard 24 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 should comply with Technical housing standards - nationally described housing standard (NDSS) (2015).

The proposal would provide two self-contained dwellings comprising 1 one bedroom dwelling and 1 four bedroom dwelling.

There are 4 bedrooms within the larger unit and three of those rooms are above 11.5sqm, meaning they can be classified as a double/twin room. One additional room is proposed and this would measure 11sqm. The applicant has highlighted that the occupancy would be up to 7 people and a single bed is shown within the smaller room, however given the layout it is considered that a double bed could be accommodated and accordingly it could occupy 2 people. Therefore given the above, the larger unit could reasonably accommodate 8 people.

The NDSS provides the following minimum space standards:-

- 1 bedroom 2 person unit (over two-storeys) - 58sqm.
- 4 bedroom 7 person unit (over three-storeys) - 121sqm
- 4 bedroom 8 person unit (over three-storeys) - 130sqm

The proposed one bedroom unit would have an GIA of around 66sqm, whilst the 4 bedroom unit would have a GIA of around 164sqm. All rooms would achieve an acceptable level of light and outlook and both units would be dual aspect.

Concerns were previously raised about accommodation in the roof space; however the room at the top of the building has now be changed into a study due to the lower ceiling height.

Both units would have amenity space at the rear.

The revised arrangement has therefore overcome previous objections and would now provide an acceptable standard of accommodation.

### **Highways**

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

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 application proposes two dwellinghouses, comprising one 4 bedroom unit and one 1 bedroom unit. The applicant has supplied parking stress surveys in support of the application.

It is noted that there have been various planning applications for this site and these are outlined within the history section above. A number of these have been refused in part on parking/highway safety grounds.

This application is however a resubmission of ref: 17/03525/FULL1 which also sought permission for the conversion of the existing single dwelling but this was into 3 self-contained flats. This included parking for 2 cars on the front driveway. At the time of that application the report to Members observed the following:-

'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 roof space 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.'

Concerns were also raised regarding on-street parking pressure and the parking surveys submitted in respect of the current application continue to demonstrate that Blakeney Avenue is under high parking stress but there is spare capacity on Blakeney Road and Monivea Road.

The current application would continue to provide space for 2 vehicles on the frontage.

The previous report to Members under ref: 17/03525/FULL1 noted that there was scope to fit 2 vehicles on the site, but this was only in the context of a single dwelling where the vehicles are in single ownership and are able to be shuffled along. But this was not considered possible for a flatted development. It also noted that Members refused the

subsequent variation application ref: 17/05492/RECON, which included the conversion of the garage for the same highway reason as 17/03525/FULL1.

In this case, whilst there has been a reduction in units the proposal would still provide a 4 bedroom dwelling with up to 7/8 occupants. The one bedroom unit would also have occupancy for 2 people. The applicant has argued that the 9 bed spaces proposed within the two units would be the same as the potential occupancy as the extended single-family dwelling. However, as indicated above, Members refused application ref: 17/05492/RECON on highways grounds and this included the conversion of the garage. The current scheme relies on this converted garage to provide the necessary accommodation for the one bedroom unit.

Furthermore, the proposed parking arrangement would appear to utilise the existing dropped kerb and one car would be parked at an angle. The highways officer has indicated that this arrangement is substandard and whilst this layout may be acceptable for a single dwelling, it would require awkward and inappropriate manoeuvring for two separate self-contained flats. Vehicles may therefore end up parking on the road and the size of the larger unit may result in additional vehicles. Therefore, there are similar concerns to the ones raised within the original submission and whilst the surveys suggest that there is capacity on surrounding roads, the parking of additional cars on these roads would be to the detriment of highway safety and the free flow of traffic. Monivea Road is a narrow unmade road where additional parking should not be encouraged due to lack of surface course, which would add 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.

Therefore, the proposal has failed to overcome previous objections and when 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 Policy 32 of Bromley's emerging local plan and Policy H11.

### **Neighbouring amenity**

Policy BE1 of the UDP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

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 two dwellings would be comparable with that of a large single family dwelling. It is noted that no objects were raised in respect of harm to neighbouring residential under ref: 17/03525/FULL1 and the current arrangement is not too dissimilar to that application. As such, no undue loss of amenity is considered to neighbouring residents.

### **CIL**

The Mayor of London's CIL is a material consideration. CIL is not payable on this application and the applicant has completed the relevant form.

### **Conclusion**

Whilst the conversion into two units is considered acceptable as set out above, the proposal would continue to result in unsatisfactory parking arrangements which 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 local plan and Policy H11.

Background papers referred to during production of this report comprise all correspondence on the files set out in the Planning History section above, excluding exempt information.

## **RECOMMENDATION: RESOLVE TO CONTEST APPEAL**

**Grounds for contesting the Appeal are as follows:**

- 1 The proposal would result in unsatisfactory parking arrangements, being inappropriate for two cars which 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 Policy 32 of the Emerging Local Plan (Submission Version 2017).**