

Committee Date	3 rd September 2020		
Address	42 Manor Road Beckenham BR3 5LE		
Application Number	20/00947/FULL1	Officer - Stephanie Gardiner	
Ward	Kelsey And Eden Park		
Proposal	Conversion and extension of existing dwelling to enable 6 one bedroom, 3 two bedroom and 1 three bedroom apartments to be provided with associated parking, cycle, bin storage, landscaping and new vehicular access.		
Applicant	Agent		
Mr & Mrs Jones	Mr Peter Hadley		
42 Manor Road Beckenham BR3 5LE	Robinson Escott Planning Downe House 303 High Street Orpington BR6 0NN		
Reason for referral to committee2	Call-In	Councillor call in Yes	

RECOMMENDATION	Refused
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<p>KEY DESIGNATIONS</p> <p>Areas of Archeological Significance Biggin Hill Safeguarding Area London City Airport Safeguarding Smoke Control SCA 12</p>
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Land use Details		
	Use Class or Use description	Floor space (GIA SQM)

Existing	C3 Residential	317
Proposed	C3 Residential	325.9

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	2	7	+5
Disabled car spaces	0	0	0
Cycle	0	17	17

Electric car charging points	28% or 2 out of 7 spaces
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Representation summary	Neighbour letters were sent out to 63 properties. A site notice was also displayed on site.	
Total number of responses	30	
Number in support	0	
Number of objections	30 A petition has also been received.	

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal would result in harm to the character, appearance and spatial qualities of the host property and streetscene.
- The proposal would result in harm to neighbouring amenities.

2. LOCATION

2.1 The application relates to a large two storey plus roof detached residential property, which is located on the corner of Manor Road and Downs Road. It is substantial red brick building, with a double height bay, mock Tudor detailing and sliding sash windows. The property is set behind a small front garden and a rear garden which measures around 18m in depth.



3. PROPOSAL

- 3.1 The application seeks planning permission for the conversion and extension of existing dwelling to enable 6 one bedroom, 3 two bedroom and 1 three bedroom apartments. The works also include associated parking, cycle, bin storage, landscaping and new vehicular access.



4. RELEVANT PLANNING HISTORY

4.1 No relevant planning history.

5. CONSULTATION SUMMARY

Statutory

5.1 Highways – No objection

The site is located to the on corner of Downs Road and Manor Road; Manor Road (A222) is a classified road and Local Distributor Route. The development is in an area with PTAL rate of 4 on a scale of 0 – 6b, where 6b is the most accessible).

Access- The proposed development will be access from both Manor Road and Downs Road. These two accesses will operate independently, with no through route being provided. The existing crossover onto Manor Road will remain as existing, providing access to a driveway capable of accommodating two vehicles.

A new access would be formed on Downs Way, providing access to five car parking spaces. This is acceptable in principle.

Car parking- A total of seven car parking spaces will be provided to serve 10 flats, which is acceptable.

Cycle Parking Provision 17 cycle parking spaces would be accommodated on-site. This is satisfactory.

Servicing/Refuse Collection - Servicing and refuse collection will continue to be undertaken on street from Manor Road, as per the existing arrangement. Bin stores are located at the front of the site, as well as on Downs Road.

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

CONDITION

OC03 (Car Parking)

AG11 (Refuse storage)

PC17 (Construction Management Plan)

AG24 (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 the crossover hereby permitted shall be at the cost of applicant.

5.2 Drainage Officer – No objection

Recommend a surface water drainage condition.

Non-statutory Consultees

5.3 Waste Services – No comments received.

5.4 Thames Water - No objection subject to the following

Would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, and testing and site remediation. Any discharge

made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991

The following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

The proposed development is located within 15 metres of a strategic sewer. Request Piling Method Statement.

As required by BR Part H para. 2.36 Thames Water requests that a positive pumped devised or equivalent is installed to prevent sewage flooding. No objection to waste water network or sewage treatment works infrastructure capacity.

The development is located within 15m of a underground water asset and recommend an informative if permission granted.

No objections to water network and water treatment infrastructure.

Conservation Officer – Objection

This proposal is harmful and not subservient to the non-designated heritage asset.

The large mansard style roof with a sizeable area of flat roof would not respect the existing unusual small-scale pitched roof of the host dwelling. (Paragraph 197 of the NPPF - substantial harm to the non-designated heritage asset.). The fact that the existing house has remained unaltered since 1885 (Introduction of design and access statement) This adds to the special, unique and unusual character of this building.

Tree Officer – No objection

The application site is free of tree related restrictions. An Arboricultural Report has been submitted in support of the proposals. An effort is being made to retain the significant trees at the site, into the proposals. A detailed protection plan is outlined to ensure the development is implemented without causing detrimental harm to retained trees.

The lime trees present the biggest constraint to the proposals. The outlook from the new extension and future landscaping is likely to be a cause for complaint for prospective occupiers.

I would also raise the issue of honeydew in respect of the car parking arrangement. Without pollarding lime tree (T10), the issue of honeydew is likely to be a further cause for

complaint. This could alternatively be overcome by installing a canopy over the parking, such as a car port.

There are arboricultural grounds to justify the proposed pruning. Whilst the scheme is compact and will impact the retained trees, the application has demonstrated sufficient precautionary methods to support planning permission.

The following conditions are recommended:

1. AG02
2. PC04
3. The approved scheme will be implemented in accordance with the Arboricultural Report (ha/aiams1/20/42mrh) dated 24th February 2020.
Reason: To satisfy the Local Planning Authority that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site and locality, in accordance with Policy 37, 73 and 74 of the Bromley Local Plan and pursuant to section 197 of the Town and Country Planning Act 1990.

Adjoining Occupiers

Summary of representations received.

Objection (Paragraph 7.26 – 7.34)

- Overdevelopment
- Out of character with the surrounding area
- Development should be of size, scale and layout which reflects the context and character of the local area
- Cramped
- Over intensive use of the site
- No amenity space other than balconies
- Increase in traffic and congestion
- Impact on road safety
- Increase stress for on-street parking on surrounding roads.
- Parking provision appears tight on site and swept path makes no allowance for poorly parking vehicles.
- Parking spaces fail to meet Bromley minimum size.
- 7.3 Spaces should be provided within this PTAL but only 7 are.
- Parking survey is misleading by counting parking on yellow lines.
- Parking survey is only a snap shot. Does not take into account parking between 08:00-19:00 due to the proximity of Ways Surgery.
- Evidence by Motion shows that Downs Road already meets the criteria as an area of stressed parking and removing one or two unrestricted kerbside parking spaces would exacerbate this.
- Local streets already experience 97% parking stress
- Residents already suffer from inconsiderate parking
- Parking proposals are below the minimum required by the Council
- Loss of green space and increase hardstanding.

- Loss of green corridor. Public Authorities should have regard to Section 40 of the Natural Environment and Rural Communities Act.
- Increase surface water runoff.
- Fails to meet requirements of the London Plan, Mayors Housing SPG and Mayor's Play and Informal Recreation SPG. Also contrary to Local Policies.
- First and second floor balconies and roof terraces which are incongruous in the streetscene.
- Overlooking
- Loss of privacy
- Visually intrusive
- Increase noise and disturbance
- Headlight intrusion
- Detrimental to health of neighbours
- Site is on a prominent corner with longer views across Bromley Road and Wickham Road Junction. It will break up the grid system than runs south along Manor Road and numerous other streets
- Impact on biodiversity
- Lime Trees have already been removed and these are no referenced in the Arboricultural report
- In an area of Archaeological Significance and Policy 46 requires a written statement on the likely impact in the form of an archaeological assessment. There is no statement and this should have prevented validation. This should be carried out.
- Question legitimacy of the proposed development term 'extension'. The conversion of the existing dwelling into 5 smaller dwellings is consistent with other properties along Manor Road. It also includes a new building containing 5 dwellings that is a new build shoehorned into an undersized site and unsuitable plot.
- Errors in application
- EV charging points have no detail and are likely to be a pillar. This will result in inability to utilise car parking spaces and vehicles will protrude from the bays making the swept path redundant
- No provision of visitor parking and loss of two on-street spaces from the new access.
- Location of cycle parking is poorly planning and located in both risk and Crime
- Unclear who parking will be designated for.
- Amenity space is undersized, inappropriately sited and overlooked
- Proposed development primarily located on a quiet cul-de-sac made up of class Edwardian linked terraces. The development is more in-keeping with a block of flats
- Garden Spaces are a characteristic of the layout housing plots and to close one would have an unacceptable impact on the local area and its residents
- Loss of light, daylight and sunlight
- A busy car park entrance may have impact on well-being and safety
- Refuse provision concerns
- Congestion will lead to poor access for emergency services
- Only room for one lane of traffic, cars and vans exiting car park
- Downs Road very family orientated
- Increase in traffic fumes
- Will double size of the existing property
- No communal outdoor space

- Statement that compares the rest of Manor Road having been converted into flat is misleading. Most are only two flats. Only a few into 4/5 two bedroom flats.
- Staff from Bromley Mercedes Garage take up most free parking and patients from the Doctors surgery.
- If yellow lines are taken out of the parking assessment percentage stress levels become 97 and 95 percent instead of 38% and 39%. This will increase when two spaces are lost on Downs Road.
- Car port is noted on the plans but not shown
- Not an extension. It is a new build taking up the whole plot
- Sets a precedent
- Increased congestion
- Application has not considered local area and contravenes numerous policies. The harm outweighs the benefits of new housing
- Will introduce development into important and characteristic garden space. Garden spaces are a characteristic of the housing plots and to close one entirely would unacceptably impact upon the character and appearance of the area.
- Applicant has failed to provide a justification for the substantial increase in density. The context density is substantially lower than 133 dwellings per hectare proposed by this development.
- Elevation along Downs Road is uncharacteristically monolithic. Elevation lacks coherence, where the extension joins the original building, the floor level steps up with windows lacking horizontal coherence.
- Downs Road characterised by regular repeating facades. Regularity contributes to the character and appearance of the streetscene and is lost when the new development façade is introduced in Downs Road.
- Amount of site turned over to hard standing. Soft landscaping relegated to the front edges and dominated by wheelie bins. Where residential conversions have taken place the external perception is one of a detached or semi-detached property but the form of proposal is more flatted, with clusters of bin stores and communal front door.
- Discrepancies with eaves and ridge heights between the drawings and statements.
- Amenity space which is not usable or practical
- Lack of play space
- Proposals may meet LP density but do not meet density in respect of local character, which is a substantially lower density.
- Poor design and poor relationship with wider development.
- Concerns about adequate daylight and sunlight to some flats
- Biodiversity
- Does not address sustainable design and construction
- Residents will have to share vehicular driveway in order to access front door
- Contrary to Secure by design principles
- Recycling and waste have not been successfully integrated into design layout.
- Overlooking and loss of privacy from balconies
- Increase in residents will lead to noise and disturbance
- Parking should provide 7.3 spaces, but this has been rounded down to 7, but this should be 8. Two of the spaces also do not meet the Bromley standard car parking space. 3 further spaces will be required to be provided on-street in an area of 97% parking stress.

- Site is within an area of Archaeological priority and a archaeological assessment should be submitted. Should not have been validated and one is needed before a decision is made.
- A number of trees removed prior to Arb assessment being carried out.
- Inconvenient and inconsiderate parking in Downs Road. Night time parking is a problem.
- Should take account of the welfare of existing residents. Bromley has compromised the quality of life by allowing many conversions. Stripping area of nature and creating disturbing level of activity.
- Bias and incorrect statements in planning statement
- CGI does not show full picture. Fails to show loss of parking space and railings etc.
- Should not be determined by planners under delegated authority.
- Overloaded in storage

The applicant has supplied a Statement of Response to Third Party Objections and this is available on the Council's website.

6. POLICIES AND GUIDANCE

National Policy Framework 2019

NPPG

Bromley Local Plan 2019

Policy 1 Housing Supply
 Policy 4 Housing Design
 Policy 6 Residential Extensions
 Policy 8 Side Space
 Policy 30 Parking
 Policy 32 Road Safety
 Policy 37 General Design of Development
 Policy 40 Other Non-designated Heritage Assets
 Policy 46 Ancient Monuments and Archaeology
 Policy 115 Reducing Floor Risk
 Policy 116 Sustainable Urban Drainage
 Policy 119 Noise Pollution
 Policy 123 Sustainable Design and Construction

The London Plan

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 5.2 Minimising carbon dioxide emissions
 Policy 5.3 Sustainable design and construction
 Policy 5.7 Renewable energy
 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 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 7.8 Heritage Assets
Policy 7.15 Reducing and Managing Noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
Policy 7.19 Biodiversity and Access to Nature
Policy 7.21 Trees and Woodlands
Policy 8.3 Community infrastructure levy

London Plan (Intent to Publish)

D1 London's form, character and capacity for growth
D3 Optimising site capacity through the design-led approach
D4 Delivering good design
D5 Inclusive design
D6 Housing quality and standards
H1 Increasing housing supply
H2 Small sites
SI 12 Flood risk management
SI 13 Sustainable drainage
T5 Cycling
T6 Car Parking

Bromley Supplementary Guidance

SPG No.1 - General Design Principles
SPG No.2 - Residential Design Guidance

Housing: Supplementary Planning Guidance. (2015)

DCLG: Nationally Described Space Standards (NDSS) (2015)

7. ASSESSMENT

7.1 The NPPF (2019) sets out in paragraph 11 a presumption in favour of sustainable development. In terms of decision-making, the document states that where a development accords with an up to date local plan, applications should be approved without delay. Where a plan is out of date, permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

- 7.2 Housing is a priority use for all London Boroughs. Policy 3.3 Increasing housing supply, Policy 3.4 Optimising housing potential and Policy 3.8 Housing choice in the London Plan generally encourage the provision of redevelopment in previously developed residential areas 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.
- 7.3 Policies including 3.3 of The London Plan 2016 and Policy 1 of the Bromley Local Plan have the same objectives. The London Plan's minimum target for Bromley is to deliver 641 new homes per year until 2025.
- 7.4 A planning appeal decision was issued on 26th June 2019 that has implications for the assessment of planning applications involving the provision of housing. The appeal at Land to the rear of the former Dylon International Premises, Station Approach Lower Sydenham SE26 5BQ was allowed. The Inspector concluded that the Local Planning Authority cannot support the submission that it can demonstrate a five year housing land supply having given his view on the deliverability of some Local Plan allocations and large outline planning permissions. According to paragraph 11d) of the NPPF in the absence of a 5 year Housing Land Supply the Council should regard the Development Plan Policies for the supply of housing including Policy 1 Housing Supply of the Bromley Local Plan as being 'out of date'.
- 7.5 In accordance with paragraph 11(d), for decision taking this means where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission unless:
- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 7.6 This application includes the provision of 10 residential dwellings, which is an uplift of 9 properties. This would represent a moderate contribution to the supply of housing within the Borough. This aspect of the proposal will be considered in the overall planning balance set out in the conclusion of the report having regard to the presumption in favour of sustainable development.

Principle of development, Design, Layout – Unacceptable

- 7.7 The proposal seeks the conversion of an existing large detached property into five self-contained flats and the construction of a rear extension in order to accommodate a further five flats.
- 7.8 The site comprises a large Victorian property of brick and tile construction. Its front elevation faces onto Manor Road, but the property is situated at the corner of Manor Road and Downs Road. It is a substantial building, but the properties along the south side of Manor Road are larger in scale, and they generally comprise double fronted detached dwellings and semi-detached Victorian-type Villas, set

within relatively wide and uniform plots. Downs Road is a dead-end road, which also includes many attractive Victorian properties. These are however smaller in scale, and have the appearance of semi-detached dwellings, but they are in fact linked terraces. They are set behind short landscaped frontages; albeit a number benefit from off-street parking to the front and side. The plots and gardens are generally narrower than the properties fronting Manor Road. A number of have also been converted into flats, but there are also examples of single residential dwellings.

- 7.9 Policy 3 of the Bromley Local Plan relates to Backland and Garden Land Development. In such cases new residential development will only be considered acceptable on backland or garden land if all of the following criteria are met: a) there is no unacceptable impact on the character, appearance and context of an area in relation to the scale, design and density of the proposed development; b) there is no unacceptable loss of landscaping, natural habitats, play space or amenity space; c) there is no unacceptable impact on the residential amenity of future or existing occupiers; d) a high standard of separation and landscaping is provided. Policy 4 of the BLP outlines the criteria that applications for new housing must meet. All new housing developments will need to achieve a high standard of design and layout whilst enhancing the quality of local places. They will also need to respect local character, spatial standards, physical context and density.
- 7.10 Bromley's Supplementary Planning Guidance No. 2 (Residential Design Guidance) also states "local context is of particular importance when adding new buildings to established areas. Building lines, spaces between buildings, means of enclosure and the use and location of garden or amenity space should all respect the character of the locality". Furthermore, the National Planning Policy Framework (NPPF) indicates that private gardens no longer fall within the definition of previously developed land. This strengthens the case for resisting development of residential gardens where it has adverse impacts on the character and appearance of the area
- 7.11 Policy 9 relates to residential conversions. The conversion for a single dwelling into one or more self-contained residential units will be permitted provided that a) the amenities of occupiers of neighbouring dwellings will not be harmed b) the resulting accommodation is of a high standard; c) on and off-street parking resulting from the development will not cause unsafe or inconvenient highway conditions; d) the character of the area is not adversely affected; e) there will be no detrimental impact on housing choice; and f) safe and secure access is provided to each dwelling. In relation to housing choice, the existing property is an exceptionally large single property. The surrounding area contains single dwelling and flatted properties. The scheme would provide a good mix of one, two and three bedroom units and it is not therefore considered that the development would impact detrimentally on housing choice. The remaining criteria are discussed in the body of the report below.
- 7.12 At present, the existing dwelling is a substantial Victorian property, which occupies a prominent corner site and turns the corner from Manor Road onto Downs Road with a double height bay window and double pitched gable detail above. The existing house has remained unaltered since 1885, which is highlighted in the

design and access statement and this is considered to contribute to the special, unique and unusual character of this building. The rear garden separates the host dwelling with the smaller scale Downs Road properties to the south. The garden area which will be extended upon is a verdant and attractive rear garden, which is considered to make an important contribution to the spacious and attractive setting of the residential properties in the street. Within Downs Road, it is considered to be an important landscaped gap which separates the larger scale properties fronting Manor Road with the properties on Downs Road to the south. In addition, the immediate gardens along the south side of Manor Road are mostly comparable in size to the garden at the application property. Many of these gardens appear to have remained unaltered in layout and devoid of any significant redevelopment since they were laid out which, particularly on this corner plot, has not only resulted in a spacious and verdant character, but is also considered to be an important part of the historic grain of the area.

- 7.13 The converted property and extension would create 10 residential units. Contextually, the surrounding area includes terrace houses, Victorian Villas and is within walking distance of a Beckenham Town Centre, which is classified as a District Centre. As such, the site is considered to be within 'urban' location as defined by Policy 3.4 of the London Plan. The density of this proposal equates to approximately 333 habitable rooms per hectare or 133 u/ha which accords with the ranges set out within Table 3.2 (Sustainable residential quality) of the London Plan. However, these figures should not be imposed mechanically, as they are intended to optimise not maximise development and a numerical calculation of density is only one consideration. It is also necessary to consider the quality of the development in relation to the surrounding context.
- 7.14 Paragraph 190 details that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. Paragraph 197 sets out that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Policy 40 Other Non Designated Heritage Assets sets out that where non-designated heritage assets are highlighted as at risk of harm from a planning application, clearly demonstrable reasons or evidence of their significance will be required. Where the Council agrees that such assets are worthy of protection, proposals to replace such buildings will be assessed against paragraph 135 of the NPPF, taking into account the scale of harm or loss and the significance of the heritage asset.
- 7.15 As highlighted above, the existing house is a substantial and attractive Victorian property which is set on a prominent corner plot and has remained unaltered since 1885 and this, together with the layout, is considered to contribute to the special, unique and unusual character of this building. It therefore is considered to make a positive contribution to the heritage of the local area. The Council's Conservation Officer has raised objections in relation to harm to a 'Non-designated Heritage Asset' on the basis that the extension, with its large mansard style roof with a

sizeable area of flat roof would not respect the existing unusual small-scale pitched roof of the host dwelling.

- 7.16 The introduction of balconies on the front elevation, together with a first floor terrace fronting Manor Road, would be an incongruous feature within the streetscene. Furthermore, the scale and elongated form of the extension, is considered to be out-of-keeping with the scale and massing of the host property and site in general. It would introduce a large built form, of a considerable bulk, into to the undeveloped rear garden, which would occupy a significant portion of the open Downs Road frontage. The extended building would be significantly larger than neighbouring properties, and would be out-keeping with the scale, proportions and pattern of wider development, including the immediate Downs Road properties in which it would be read against.
- 7.17 The whole of rear amenity space would also be taken by either the extension or hard standing associated with a rear parking area. Whilst a rear parking area is noted on the opposite of Downs Hill, the main building remains in much of its original un-extended form. The layout of the development, including the parking area hidden behind the main building, together with the loss of amenity area would not in-keeping with the pattern of wider development and would result in the erosion of this important landscaped gap within the streetscene. In addition, the extent of the building and amount of site coverage would represent a cramped and discordant form of development on this prominent corner plot, harmful to the appearance of the host property, and character, appearance and spatial qualities of the streetscene in general.
- 7.18 Accordingly, the proposal as a result of the size and design of the extension, together with the layout and location of the development, would be out of character with the prevailing pattern of residential development, cramped and discordant within the streetscene and harmful to the character, appearance and spatial qualities of the property and area in general. The proposal is therefore contrary to Policies 3, 4, 37 and 40 of the Bromley Local Plan; Policies 3.5, 7.4 and 7.8 of the London Plan; Supplementary Planning Guidance No 1 General Design Principles, Supplementary Planning Guidance No 2 Residential Design Guidance and the National Planning Policy Framework. These policies, among other things, seek to ensure development is of a high standard and should complement the scale, form, and layout of adjacent buildings, recognise as well as complement the qualities of surrounding areas and enhance local context and character.

Standard of residential accommodation – On balance Acceptable.

- 7.19 In March 2015 the Government published The National Technical Housing Standards. This document prescribes internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.

- 7.20 Policy 4 of the BLP 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 Technical Housing Standards.
- 7.21 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.
- 7.22 The proposal seeks to provide 10 residential units comprising 6 one bedroom, 3 two bedroom and 1 three bedroom apartments.
- 7.23 The proposed units would comply with the prescribed housing standards and an BR M4(2) statement has been supplied demonstrating compliance where possible.
- 7.24 All habitable rooms would achieve a satisfactory level of light and outlook.
- 7.25 Amenity space has been provided for 8 units in the form of terraces and the remaining two units within the converted building would have use of a shared garden. However the 'shared garden' appears to either be a very small lawn area to the rear or the exposed area of grass along the frontage. Each of these spaces is not considered to be of a size or arrangement which is actually usable or would not interfere with other properties within the building.

Neighbourhood Amenity – Unacceptable.

- 7.26 Policy 37 of the BLP 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.
- 7.27 The application property is located within a residential context and the existing building was in residential occupation. Number 36 and 44 are however examples of other large properties fronting Manor Road, which have been sub-divided into flats. The existing property is large, and the conversion into flats, whilst potentially having a greater number of 'comings and goings', would unlikely result in a significant level of noise and disturbance.
- 7.28 The proposal however also includes the extension at the rear to provide 5 additional units, and various other external alterations.

- 7.29 The building would be extended into the rear garden area by approximately 16.5m and is set closer to the eastern edge of the plot. An area of hardstanding serving the new parking area would be situated behind this extension along the western boundary of the site. The extension has been design to account for the corner site and curves along the western edge. However the main bulk of this addition would be set perpendicular to No 40 Manor Way, and would be set back from the common boundary by c.11 metres. No 40 appears to be sub-divided into two flats and includes windows on the rear elevation. It also appears to be set at a slightly lower ground level.
- 7.30 The rear of the extension, which faces towards the rear garden of No 40, has three floors of accommodation and this includes dormers, large sliding doors and Juliette balconies up to roof level. The extension, whilst marginally lower than the maximum extent of the main building would extend out much further than the rear elevation of this neighbour and together with the degree of site coverage, is considered to be of a significant in bulk. The depth, height and mass of the development would have a significant enclosing effect for Number 40 and gardens to the west. Furthermore the addition, due to its overall scale, depth into the garden, window treatment and height would appear dominant, and the set back from the common boundary is not considered to sufficient to mitigate this visual impact. There is some established overlooking towards the rear gardens from neighbouring windows; however the extension would include various windows and balconies serving habitable areas, which face towards the amenity area of Number 40. Despite being set an angle to rear of elevation of Number 40, the elevated nature of the windows, together with their number and proximity would be an adverse effect on living conditions of Number 40 in respect of privacy.
- 7.31 In addition, a parking area is proposed to the rear of the extension and the spaces would abut the common boundary fence. At present, the application garden is undeveloped and the ground level slopes upwards towards the rear of the site. The ground level would be partially raised to the rear of the original building and the provision of a parking immediately adjacent to the boundary and close to the rear elevation of Number 40 would likely give rise to increased noise and general disturbance from slamming of car doors and general vehicular operation. The parking area is also situated close to the rear of Number 2 Downs Road, which could result in similar harm outlined above. Further, a first floor terrace is also proposed at the front of the building above an existing ground floor addition. This would be set close to the windows within the front elevation of Number 40, which appear to be habitable rooms. The size, location and elevated nature of this terrace could give rise to situations which also result in noise and disturbance for neighbouring properties. The plans are also annotated to include a car port over the proposed parking area. However, this has not been demonstrated on any elevational drawing. The length and height of this structure, without a plan to demonstrate the contrary, could be visually dominant and intrusive for the neighbouring property at Number 40.
- 7.32 The extension would be situated to the side of Number 2 Downs Road. This property is sub-divided into flats and there are windows to the side. The building would extend into the garden, but would be set back from Number 2 by c.6.4m. In

addition, the proposal would not extend beyond its rear elevation. It is not therefore considered that the structure would be unacceptably overbearing. In addition, Number 2 is to the south of the development and in light of this orientation and location of the flank windows, it is not considered that there would be a material loss of light or overshadowing for these neighbours. However, a balcony is proposed within the side of the extension at first floor level. This could give rise to perceived overlooking and harm in respect of privacy given the proximity to the flank windows to the side of Number 2 and elevated position.

- 7.33 On the opposite side of Downs Road is Number is 44 Manor Road. This property is sub-divided into flats. There are unobscured windows within the side elevation, which face towards Downs Road and also the development site. There is a small amenity area to the rear. Some of the windows within the side elevation are unobscured and appear to serve habitable rooms. The separation between these windows and the development, including forward projecting balconies would be around 17m. The arrangement of the buildings and location of the road, it is not considered that the development would be unacceptably overbearing, however the extension would project further into the rear garden and the proposed windows and balconies in particular would sit opposite this habitable windows and could result in a loss of privacy.
- 7.34 Therefore, the proposal as a result of its scale, design and layout, together with the layout of the parking area would be a dominant and un-neighbourly form of development, resulting in a loss of outlook, increased sense of enclosure, overlooking, loss of privacy and increased noise and disturbance, thereby harmful to neighbouring residential amenities and contrary to Policies 3, 4, and 37 of the Bromley Local Plan (2019).

Highways - Acceptable

- 7.35 London Plan and BLP Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Car parking standards within the London Plan and Local Plan should be used as a basis for assessment.
- 7.36 The site has a PTAL of 4 on a scale of 0-6b, where 6b is the most accessible. The proposal would provide off-street parking for 7 vehicles, with access from both Manor Road and Downs Road. These two access points would operate independently. Two spaces would be located on Manor Road, served by an existing dropped kerb. A further 5 spaces would be provided to the rear of the extension, accessed via a new dropped kerb from Downs Road. The Council's highways officer has not objected to the access arrangements in relation to pedestrian or highway safety.
- 7.37 A total of 7 parking spaces are proposed to serve 10 flats, with a breakdown of x6 one bedroom units, x3 two bedroom units and x1 three bedroom units. A highways technical note with parking survey has been prepared and submitted in support of the scheme. In line with Local Parking Standards a total of 0.73 spaces are required for the development.

- 7.38 Local residents have highlighted that there is a high demand for on-street parking, particularly on Downs Road. It is clear from the parking survey that Downs Road and Manor Grove, which is the next available road to the east of the site, do experience high levels of parking stress overnight, with Downs Road being 96% and 117% stressed over two nights and Manor Grove being 138% and 125% stressed over two nights. However, the survey also demonstrates that when using the Lambeth Methodology, which reviews parking within a 200m radius the total level of parking street was found to only be 38% and 39% over two nights.
- 7.39 Whilst there have been a significant number of objections in relation to increase parking demand and further on street parking pressures - particularly during the day on Downs Road as a result of the proximity of Doctor's Surgery - the Council's highways officer has not objected to methodology of the Parking Survey, conclusions of the report or the level of parking being proposed. The London Plan also states that developments in areas of good transport accessibility, such the application site, should aim for significantly less than 1 space per unit. Two of the spaces will be provided electric charging points.
- 7.40 17 Cycle parking spaces would be provided and this has also been considered to be satisfactory by the highway officer. Servicing and refuse collection will continue to be undertaken on street from Manor Road, as per the existing arrangement as well as on Downs Road, which are accessible.
- 7.41 Therefore, having regard to the highway officer comments, the access arrangements, parking arrangements, cycle provision and refuse provision are considered to be acceptable.

Trees – Acceptable

- 7.42 The application site is free of any tree related restrictions such as a Tree Preservation Order or Conservation Area designation. There are a number of trees and shrubs surrounding the boundary of the site. An Arboricultural Report has been supplied in support of the application. This highlights that a small Holly Tree (T9) and a group of shrubs containing a young Cherry and Yew are also to be removed (G3). The Council's Arboricultural officer has identified that efforts have been made to retain many of the trees on site and a detailed protection plan has been outlined.
- 7.43 However, the above officer has also identified that the retained Lime Trees along the western boundary present the biggest constraint to the development as the outlook from the new extension and future landscaping is likely to be a cause for complaint. There is also a tree within the rear parking area, which may be impacted. However, no objections have been raised and the application has demonstrated sufficient precautionary methods. Therefore the impact on the trees has been found to be acceptable.

CIL - Acceptable

- 7.44 The Mayor of London's CIL is a material consideration. CIL is payable on this application.

8. CONCLUSION

- 8.1 The development would result in provision of 10 residential dwellings, which is an uplift of 9 dwellings. All would achieve a satisfactory standard of accommodation, and contribute moderately to the boroughs overall housing provision. Additionally, it would provide an acceptable level of parking and would not result in an unacceptably highway impact. However, the development as a result of the extension and general design would result in significant harm to the character, appearance and spatial qualities of the host property, streetscene and area in general. There would also be significant harm to neighbouring residential amenities.
- 8.2 In respect of the Council's 5 year housing land supply and the Inspectors conclusions surrounding the recent appeal outlined within the 'principle' section above, paragraph 11d (ii) of the Framework would be applicable. In this case, the harm arising from the proposal is considered to significantly and demonstrably outweigh the benefits of the development.
- 8.3 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: Application refused:

1. The proposal as a result of the size and design of the extension, together with the layout and location of the development, would be out of character with the prevailing pattern of residential development, cramped and discordant within the streetscene and harmful to the character, appearance and spatial qualities of the property and area in general. The proposal is therefore contrary to Policies 3, 4, 37 and 40 of the Bromley Local Plan; Policies 3.5, 7.4 and 7.8 of the London Plan; Supplementary Planning Guidance No 1 General Design Principles, Supplementary Planning Guidance No 2 Residential Design Guidance and the National Planning Policy Framework.
2. The proposal, as a result of its scale, design and layout, together with the layout of the parking area would be a dominant and un-neighbourly form of development, resulting in a loss of outlook, increased sense of enclosure, loss of privacy and increased noise and disturbance, harmful to neighbouring residential amenities and contrary to Policies 3, 4, and 37 of the Bromley Local Plan (2019).