

Decision Maker: EXECUTIVE

**FOR PRE-DECISION SCRUTINY BY THE RENEWAL,
RECREATION AND HOUSING POLICY DEVELOPMENT AND
SCRUTINY COMMITTEE AND DEVELOPMENT CONTROL
COMMITTEE**

Date: DCC: 2 November 2021
RRH PDS: 16 November 2021
Executive: 24 November 2021

Decision Type: Non-Urgent Executive Key

Title: DESIGNATION OF THE COVERT CONSERVATION AREA, THE
THRIFTS CONSERVATION AREA AND THE EXTENSION OF
THE CHISLEHURST ROAD CONSERVATION AREA

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Ward: Petts Wood and Knoll; Cray Valley West

1. Reason for report

- 1.1. This report recommends the designation of the Covert Conservation Area (shown at Appendix 1), the Thrifts Conservation Area (shown at Appendix 2) and the extension of the Chislehurst Road Conservation Area (shown at Appendix 3). The proposed boundaries were informed by an independent assessment and were subject to public consultation between October and December 2020. Details of the representations received and how these representations have been addressed are set out in the report.

2. RECOMMENDATION(S)

- 2.1. That Development Control Committee endorse the designation of the Covert Conservation Area (shown at Appendix 1), the Thrifts Conservation Area (shown at Appendix 2) and the extension of the Chislehurst Road Conservation Area (shown at Appendix 3).**
- 2.2. That Members refer the matter to the Renewal, Recreation and Housing Policy Development and Scrutiny Committee for pre-decision scrutiny.**
- 2.3. That Executive approve the designation of the Covert Conservation Area (shown at Appendix 1), the Thrifts Conservation Area (shown at Appendix 2) and the extension of the Chislehurst Road Conservation Area (shown at Appendix 3).**

Impact on Vulnerable Adults and Children

1. Summary of Impact: No impact
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Corporate Policy

1. Policy Status: Not Applicable
 2. BBB Priority: Regeneration Quality Environment
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Financial

1. Cost of proposal: Costs associated with designation will be met from the Planning Policy and Strategy budget.
 2. Ongoing costs: N/A
 3. Budget head/performance centre: Planning Policy and Strategy
 4. Total current budget for this head: £0.568m
 5. Source of funding: Existing Revenue Budget for 2021/22
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Personnel

1. Number of staff (current and additional): 1
 2. If from existing staff resources, number of staff hours: N/A
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Legal

1. Legal Requirement: Statutory requirement, set out in Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), for every local planning authority to determine, from time to time, which parts of their area are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Non-statutory policy and guidance provides detail on how Conservation Areas should be identified and designated.
 2. Call-in: Applicable
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Procurement

1. Summary of Procurement Implications: N/A
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? No

2. Summary of Ward Councillors comments: Ward Councillors were not asked for comments on this report but have previously noted support for the designation of the Conservation Areas. Comments in support of the proposed designations were received from one Ward Councillor during the consultation on the proposed areas.

3. COMMENTARY

Background

- 3.1. In September 2020, Development Control Committee¹ approved a public consultation exercise to seek views on three proposed Conservation Areas: the Covert Conservation Area, the Thrifts Conservation Area and the extension of the Chislehurst Road Conservation Area.
- 3.2. The proposed boundaries for the Thrifts Conservation Area and the extension to Chislehurst Road Conservation Area were informed by a detailed character assessment prepared by independent external consultants - Built Environment Advisory & Management Service (BEAMS). The assessment is provided at Appendix 4.
- 3.3. The BEAMS report did not recommend designation of the Covert as a Conservation Area. At the Development Control Committee meeting on 24 September 2020, members discussed the inclusion of the Covert as a potential new Conservation Area, as part of the proposed consultation exercise:

“The first photograph on page 499 of the BEAMS assessment was of The Covert. However, this road had not been included as part of the new Conservation Area. Councillor Fawthrop moved (and it was agreed) that The Covert covering the Noel Rees houses from Nos. 1-29, 2-48 but excluding 24- 26b, be included as part of the new Conservation Area. An application for the installation of roof lights at No. 44 The Covert was dismissed at appeal and enforcement action was undertaken. The Inspector’s report referred to the unique setting of The Covert and alluded to the design heritage of the Noel Rees houses.”²

- 3.4. Following discussion, Development Control Committee resolved to include the Covert, covering the Noel Rees houses from Nos. 1-29, 2-48 but excluding 24-26b, as part of the consultation exercise.
- 3.5. Consultation on the three proposed Conservation Areas was undertaken between 30 October and 14 December 2020. All properties within the proposed Conservation Area, and those in close proximity to the boundary, were sent a letter and questionnaire. Details of the consultation were also available on the Council’s website alongside an online survey.

Consultation responses

- 3.6. A total of 391 representations were received, from local residents, residents’ groups, and Historic England; this was made up of 16 e-mail and written responses, and 375 survey responses (approximately 80% of which came via the online survey). It should be noted that no response – either those comments proposing new areas or those comments which disagreed with the proposed designations. - included any detailed character assessment or other evidence to support comments made or to rebut evidence from the BEAMS report.

The Covert Conservation Area

- 3.7. Of those representations which stated agreement or disagreement with the proposal, 288 (82%) agreed with the proposed designation (220 of which strongly agreed) and 65 (18%) disagreed (54 of which strongly disagreed).

¹ ‘PETTS WOOD CONSERVATION AREAS’, Development Control Committee 24 September 2020, available from: <https://cds.bromley.gov.uk/documents/s50083375/PETTS%20WOOD%20CONSERVATION%20AREASPART%201%20REPORT%20TEMPLATE.pdf>

² Minutes of Development Control Committee meeting held on 24 September 2020, available from: <https://cds.bromley.gov.uk/documents/g6908/Public%20minutes%20Thursday%2024-Sep-2020%2018.30%20Development%20Control%20Committee.pdf?T=11>

3.8. 38 representations did not express an opinion about the proposed designation.

The Thrifts Conservation Area

3.9. Of those representations which stated agreement or disagreement with the proposal, 287 (80%) agreed with the proposed designation (222 of which strongly agreed) and 74 (20%) disagreed (64 of which strongly disagreed).

3.10. 30 representations did not express an opinion about the proposed designation.

Extension to Chislehurst Road Conservation Area

3.11. Of those representations which stated agreement or disagreement with the proposal, 287 (81%) agreed with the proposed designation (233 of which strongly agreed) and 69 (19%) disagreed (56 of which strongly disagreed).

3.12. 35 representations did not express an opinion about the proposed designation.

Response to issues raised in consultation responses

3.13. The Council's response to representations received is provided at Table 1. The responses are grouped into general comments; specific comments on the proposed Conservation Areas; and requests for additional Conservation Areas.

3.14. As noted above, none of the responses received provided any substantive evidence (e.g. a character assessment) to support comments made or requests for areas to be added to or removed from the proposed area(s). A number of comments simply put forward suggestions for new Conservation Areas (including suggestions for designating the entire Area of Special Residential Character (ASRC) as a Conservation Area) without any justification.

3.15. A lot of reasons put forward in support of the proposals (or in support of suggestions for further designations) were not relevant considerations for the purposes of designating a Conservation Area; common reasons included support on the basis that the Conservation Areas would ban or severely restrict development, or that the designations would increase house prices. As set out in Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), Conservation Areas should be designated based purely on whether they have special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

3.16. With regards to the issues noted above raised in the representations, it is acknowledged that the Conservation Area will lead to additional restrictions for properties within the area, but it is considered that the area is justified on merit, as set out in the BEAMS report and in line with legislation and guidance.

3.17. Comments in support of the proposed area were received from Historic England (HE). The HE response welcomed the Council's proposal to designate the three proposed Conservation Areas, and noted the following:

"The BEAMS report sets out a well-researched argument for designation and the significance of the proposed conservation areas. These are all within the Petts Wood area, which represents a good quality 1930s garden suburb. There are three existing conservation areas within the suburb and the majority of the area is included in an Area of Special Residential Character (ASRC).

The report considers whether the whole ASRC is of sufficient architectural and historic interest to warrant upgrading to conservation area status. The conclusions of the report find that it does

not possess the special interest to merit this designation. However, the extension of the Chislehurst Road Conservation Area, and the designation of 'The Thrifts' Conservation Area, are proposed. These sub-areas generally contain grander, detached houses of greater architectural interest. An additional conservation area is proposed by the Council, 'The Covert', which is set apart by the concentration of mature trees which predate the housing development and have influenced its layout. We consider these designations to be justified and are content for the Council to proceed on the basis of the report and local consultations."

Table 1: summary of representations received, and LBB response

Summary of comments	LBB response
<i>General comments</i>	
<p>Criticism of priority given to new Conservation Areas given we are in the middle of a pandemic, schools, hospitals, and the Police are chronically underfunded, and Bromley recently decided not to support free school meals in the holidays. A number of respondents considered that the exercise was a waste of money.</p>	<p>Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states: <i>“It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly”</i>. The exercise to investigate potential Conservation Areas in Petts Wood has been undertaken as part of fulfilling this duty on an ongoing basis.</p>
<p>Criticism that the proposed Conservation Areas are vanity projects to appease local groups, and just a cynical attempt to railroad Petts Wood residents yet again to fulfil someone’s undeclared agenda.</p>	<p>The Conservation Areas have been informed by an independent report. The report looked at the entire ASRC and considered that only certain parts of the area warranted Conservation Area status.</p>
<p>Concern raised that these proposals will not be the last of proposals, and that there will inevitably be further proposals to extend the area until the whole area is covered by a Conservation Area.</p>	<p>As above, the independent report which informed the proposed Conservation Areas looked at the entire ASRC and considered that only certain parts of the area warranted Conservation Area status. It is also noted that no substantive evidence was submitted as part of the consultation to suggest additional areas within the ASRC should be designated. It is considered very unlikely that any cogent reasons could be put forward to justify further Conservation Areas in the remaining ASRC area.</p>
<p>Several respondents noted existing policy and controls (ASRC designation and Article 4 Directions) and considered that they offer sufficient protection for the area already.</p>	<p>The ASRC designation does have Development Plan status but does not have the same legislative force as a Conservation Area. Article 4 Directions remove permitted development (PD) but are not relevant to the determination of planning applications. The new Conservation Area designations are considered to be justified as set out in this report and will give stronger protection to the identified architectural and/or historic interest of these areas.</p>
<p>A number of respondents raised concern about the impact that the proposed Conservation Areas could have on property values.</p>	<p>Impact on property value is not a relevant consideration to be taken into account when determining whether to designate a Conservation Area.</p>
<p>Reference to recent appeal decision (specific appeal decision not cited) where Inspector noted that proposed new dwellings would make a positive contribution to the area. Respondent considers that</p>	<p>Conservation Area status will not preclude development in-principle (particularly where it can be demonstrated that it will not cause harm), but it will give heightened protection to the identified architectural and/or historic interest of these areas.</p>

Summary of comments	LBB response
<p>this shows that new development does not necessarily harm the character and appearance of the area.</p>	
<p>A number of responses raised concern about the additional bureaucracy associated with a Conservation Area designation, such as restrictions on alterations to property. Concern was raised that it would put off prospective purchasers and lead to houses falling into disrepair. One respondent noted that the proposals could prevent homes being retrofitted to improve energy efficiency standards, which is environmentally irresponsible.</p>	<p>Conservation Area status does limit use of some permitted development rights, but as noted above, Conservation Area status will not preclude development in-principle (particularly where it can be demonstrated that it will not cause harm). It will give heightened protection to the identified architectural and/or historic interest of these areas.</p>
<p>A number of respondents made broad comments that the areas in general did not warrant designation. One respondent felt that the BEAMS report does not accurately reflect extent of architectural and historic interest. Another respondent considered that the BEAMS report is a contrived attempt to create architectural & historic interest, and many areas within Bromley have similar architectural styles together with styles and histories of their own, which in some cases are far more historically important than Petts Wood yet somehow not considered – respondent gave example of West Wickham, Penge, Clock House, Kelsey Park, Sundridge, Bickley, Chislehurst, Keston, Hayes, Farnborough, Crofton, Chelsfield and Orpington. Petts Wood is considered unexceptional by comparison to other areas and therefore the proposed Conservation Areas risk devaluing the concept of conservation.</p>	<p>The BEAMS report is a comprehensive assessment of the area and sets out the relevant justification for identifying a new Conservation Area at the Thrifts, and an extension to the Chislehurst Road Conservation Area.</p> <p>As noted elsewhere in this report, while the Covert was not recommended for designation as a Conservation Area in the BEAMS report, it is considered that there is justification for the designation.</p> <p>It is considered that the proposed three new/extended Conservation Areas are appropriate and would not devalue the concept of conservation. It is noted that the proposed areas are supported by HE.</p>
<p>Several respondents raised concern about consulting and deciding on the Conservation Area designations while we are in the midst of the Covid-19 pandemic.</p>	<p>The pandemic has not had any specific impact on the quality of the consultation, as we would have undertaken the same methods in a non-pandemic world. Residents had the opportunity to make representations and ask questions during the consultation period. Respondents have not identified a specific adverse impact that has arisen due to the perceived lack of engagement.</p>
<p>Several respondents made a general point questioning why boundaries excluded some houses on a road and not others.</p>	<p>The BEAMS report, and this committee report, set out the justification for the proposed Conservation Areas. A number of suggestions for additions and exclusions were put forward; these are addressed in the sections of Table 1 below.</p>
<p>Several respondents considered that previously permitted development in the area has already undermined the area's</p>	<p>The respondents do not specify the developments in question, except one respondent who mentions a development in the Station Square</p>

Summary of comments	LBB response
<p>character. Development on Station Square was mentioned specifically.</p>	<p>area; this area is covered by an existing Conservation Area and part of the ASRC that is not proposed for a new Conservation Area designation.</p> <p>Regardless, the existence of new development does not affect potential Conservation Area designation in principle. Such designations are justified on an objective assessment of historic and architectural interest, which would include consideration of whether certain developments have adversely impacted an area.</p>
<p>A number of respondents suggested additional controls be put in place to limit basement development and to require the use of specific materials for development in the area.</p>	<p>The Local Plan review is the appropriate place to investigate the potential of these additional controls.</p>
<p>There were a number of suggestions for additional Article 4 Directions, including limiting the ability to construct boundary fences/walls and paving over front gardens.</p>	<p>Any Article 4 Direction must be justified in line with national policy and guidance and is subject to available resources. PD rights which allow paving over front gardens already has restrictions within the PD right, including a size limit and requirement to use permeable paving to alleviate any flood risk issues.</p> <p>There is already an Article 4 Direction in place across the ASRC to remove Part 2, Class A PD rights (which allow construction of fences and gates).</p>
<p><i>Comments on specific proposed Conservation Area</i></p>	
<p>One respondent considered that the houses on Little Thrift are not in the same class as those on Great Thrift.</p>	<p>The BEAMS report recognises that Little Thrift is of slightly less architectural interest than Great Thrift, but still highlights its interesting layout, woodland setting, and the number of detached houses as reasons for designating as Conservation Area.</p>
<p>One respondent considered that the houses in the Thrifts area are not unique to the Petts Wood area and are not built by Noel Rees, hence they are not deserving of conservation status.</p>	<p>The justification for designating the Thrifts is set out in the BEAMS report. The justification for Little Thrift is set out above.</p> <p>Regarding Great Thrift, the BEAMS report (at page 38) sets out the following:</p> <p><i>“The houses on the south side of Great Thrift at the top of the hill are really unusual and interesting. This area of Great Thrift down to Hazlemere Road is deserving of conservation area designation due to</i></p>

Summary of comments	LBB response
	<p><i>its “special” architectural quality... This includes the quality and detail of the houses, the attractive road layout on a hillside and the impressive setting against a back drop of ancient woodland. These three aspects work together to create something “special” and worthy of conservation area status.”</i></p>
<p>One respondent considered that there is no single connecting theme or design in the Covert which justifies designation of a Conservation Area. It is a mismatch of designs, including three bungalows, reflecting the different ages of properties.</p>	<p>While there are a mix of styles on the Covert, there is a consistent pattern of detached Noel Rees style neo-Tudor houses and semi-detached houses with prominent front gables (although one is half-timbered the other is austere and unadorned). There is also consistent use of trees within the streetscape which give a woodland ambience.</p>
<p>One respondent considered that, as the Covert is close to a busy road (Crofton Lane) and a large council estate, this would undermine the Conservation Area status.</p>	<p>The proximity to Crofton Road is not considered to detract from the character of the Covert. Likewise, the council estate referred to is not considered to be sufficiently close to detract from the character of the area.</p>
<p>One respondent questioned the inclusion of the southern extension to Chislehurst Road CA (from junction at Petts Wood Road to Grosvenor Avenue).</p>	<p>The BEAMS report sets out the justification for this section of the proposed Conservation Area:</p> <p><i>“The Pamphilon houses on this section are no less interesting than the Pamphilon houses that are within the Chislehurst Road Conservation Area to the north, they lack the woodland setting but that is all. The loss of any one of these houses to demolition and redevelopment would impact negatively on this stretch of road which is currently unified by its limited palette, regular plot sizes and angular designs. The houses on the other side of the road are of less interest but should also be upgraded to conservation area status to preserve the integrity of the road as a whole.”</i></p>
<p><i>Additional areas suggested for designation</i></p>	
<p>Greencourt Road</p>	<p>The BEAMS report (at page 19) notes mapping evidence which shows that Greencourt Road is a later Road (post 1930); the report does not highlight any particularly prominent features that would warrant Conservation Area designation.</p> <p>A small part of Greencourt Road (nos. 81-83) is included, but this is due to the prominence of its corner location (at the junction of Greencourt Road and Ladywood Avenue). The BEAMS report also notes that nos.</p>

Summary of comments	LBB response
	81-83 is <i>“is a canted semi-detached house with an Alpine character, similar to those on the corner of Hazlemere Road and Great Thrift”</i> (which are included within the proposed Thrifts Conservation Area).
Birchwood Road	<p>The northern part of the proposed extension to the Chislehurst Road Conservation Area extends to no. 42 on the North side of the Road, and no. 51 on the South side. The rationale for this is set out in the BEAMS report (on page 37):</p> <p><i>“The architectural interest of the south side of the road doesn’t appear to be any different to the south side within the conservation area, having the same neo-Tudor style brick and timber detached houses. The north side is more mixed but there are several interesting houses, number 20 is particularly eye catching and number 24 has a blue plaque commemorating the opera singer who owned it, Sir Geraint Evans. Due to the architectural interest this should be upgraded to conservation area status.”</i></p> <p>As noted, the Northern side is more mixed in terms of character, therefore the recommendation on the boundary reflects a judgement on extent of properties which collectively add to the character. It is considered that the character evident from no.44 onwards (up to Hazlemere Road) does not warrant designation.</p>
Willett Way	Historic map regression set out in the BEAMS report (pages 13-15) shows and describes how much of Willett Way is post 1930 with some parts being as late as the 1940s. This later construction, coupled with the lack of any particular interest compared to other parts of the ASRC, led to the recommendation that Willett Way is not designated as Conservation Area. It is therefore considered that the criteria for conservation area status is not met.
Princes Avenue	Much of Princes Avenue is included in the proposed extension to the Chislehurst Road Conservation Area. The boundary ends at no. 56, based on historic map regression (shown on pages 14 and 15 of the BEAMS report) which suggests that this was historically where the houses on the Northern side extended to.

Summary of comments	LBB response
	No. 2a is also excluded as this a modern house and does not therefore meet the criteria for inclusion.
Chislehurst Road (all properties that are not already included)	<p>The proposed extension to the Chislehurst Road Conservation Area, along with the existing Conservation Area, means that much of Chislehurst Road will be covered.</p> <p>Properties at nos. 182, 189-199 and 237 are excluded as these are later 20th Century houses and are not considered to meet the criteria for conservation area designation.</p>
Grosvenor Road	Page 20 of the BEAMS report says: <i>“Grosvenor Road is an unremarkable road of semis and detached houses. They are notably wide plots for the semi-detached houses, consequently many have been altered to the side...”</i> As a result, it is not considered to warrant inclusion within a Conservation Area.
St. John’s Road (include Crofton Road end)	<p>St. Johns Road is not included within any of the Conservation Area boundaries. The ASRC was considered a reasonable starting point for investigating the potential for Conservation Area designation, hence this was the focus of the BEAMS report. Only part of the road falls into the ASRC (the northern part at the Tudor Way end) hence only this part was considered for inclusion.</p> <p>The Northern part of the Road is not considered to warrant designation as historic map regression shows these units were of later construction than other houses in the area, and therefore have less historic interest.</p>
Manor Way	The BEAMS report (at page 8) notes that Manor Way was developed after the bulk of the historic area. Page 13 of the report recognises the ‘Baronial Hall’ typology evident on Manor Way but notes that there are more interesting variations on this typology elsewhere. For these reasons, Manor Way is not considered to warrant Conservation Area status.
Crossway	Crossway features a mix of typologies and there are numerous instances of alterations evident along the Road. Additionally, it does not have the same level of historic interest, as shown through historic map regression.

Summary of comments	LBB response
St. Georges Road	The BEAMS report (at page 21) notes that, while the Northern end of St. Georges Road is in the classic Noel Rees Petts Wood style with the two types of semi-detached houses, the Southern end is very varied with bungalows and detached houses of varying dates and has a very mixed character in contrast to the rest of the ASRC. This detracts from the overall character of the Road and it is therefore not considered to justify designation.
Wood Ride	Part of Wood Ride is in current Chislehurst Road Conservation Area. The houses that remain outside (which are not proposed for designation) are not considered to retain enough special interest; while there may be some parts of interest remaining, these are too dispersed to form an integral part of the proposed Conservation Area.
Kingsway	The BEAMS report (at page 18) notes that Kingsway features “ <i>unremarkable semi-detached houses</i> ” and plain semis. Much of Kingsway has been eroded since construction which has affected its historic and architectural interest; therefore, it does not warrant inclusion within the new Conservation Area.
Petts Wood Road	While Petts Wood Road retains some architectural and historic interest, it is not considered enough to warrant Conservation Area designation.
The Covert (whole road)	The majority of the Covert is proposed for designation. The houses at 24-26b are not included in the proposed boundary as these are modern houses that do not merit Conservation Area designation.
Hazelmere Road	While the BEAMS report (at pages 16 and 17) notes that Hazelmere Road does have some historic and architectural merit, it is not considered to be the same level as other areas within the proposed Thrifts Conservation Area, based on the combination of factors set out in the BEAMS report.
Woodland Way	Similar to comments on Hazelmere Road and Silverdale Road, while Woodland Way has some merit (as set out on pages 16 and 17 of the BEAMS report), it is considered that this is the same level as other areas of interest such as Great Thrift and Little Thrift.
Silverdale Road	Similar to comments on Hazelmere Road and Silverdale Road, while Woodland Way has some merit (as set out on page 16 of the BEAMS report), it is not considered that this is the same level as Great Thrift and Little Thrift.

Summary of comments	LBB response
Great Thrift Road, include all properties, particularly the properties adjoining the railway line leading to Petts Wood Station which contain trees that (may) have protected status close to the railway lines.	The proposed boundary on Great Thrift includes those houses that represent the finest architectural examples and combine an unusual and interesting character which is special enough to warrant Conservation Area designation. The BEAMS report, at pages 16, 17 and 38, sets out details of this character.
Towncourt Crescent	As with other roads that have not been included, it was considered that Towncourt Crescent does not display the necessary combination of factors that warrants Conservation Area designation.
Priory Avenue	As with other roads that have not been included, it was considered that Priory Avenue does not display the necessary combination of factors that warrants Conservation Area designation.
Sutherland Avenue	<p>Sutherland Road is not within the ASRC and has not been considered for designation. The ASRC was used a reasonable starting point for investigating the potential for Conservation Area designation.</p> <p>Notwithstanding this, it is evident that Sutherland Avenue features a range of housing typologies dating from the early to mid-20th Century. It does not demonstrate the necessary special character to warrant Conservation Area designation.</p>

- 3.18. In conclusion, the proposed boundary has been subject to extensive consultation and representations received have been fully considered. The consultation exercise showed significant support for the designation of the three proposed Conservation Areas.
- 3.19. The BEAMS report has considered the entire ASRC in detail to determine what parts of the area warrant Conservation Area designation. While there are lots of streets within the ASRC that display some level of architectural or historic interest, we must be mindful of paragraph 191 of the NPPF which states that *“local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest”*.
- 3.20. The BEAMS report sets out the justification for the proposed Conservation Area at the Thrifts and the proposed extension to the Chislehurst Road Conservation Area.
- 3.21. Regarding the Covert, officers have clarified with BEAMS the reason why the Covert was not recommended for inclusion originally. BEAMS noted the area’s interesting layout, specimen trees and Noel Rees houses, and that it was one of the areas of greater interest within the ASRC. However, their decision not to recommend the Covert as a Conservation Area related to the presence of more modern housing at 24-26b, which they consider detracts from the overall character.
- 3.22. BEAMS’ consideration was finely balanced. Officers have given further consideration to the merits of the area and consultation feedback, and it is considered that the positive merits of the area would justify Conservation Area designation; the existence of the more modern housing is noted, but in our judgement, this does not detract from the evident special character.
- 3.23. In summary, it is considered that the proposed Conservation Areas are designated as per the boundaries consulted on; no amendments to the boundaries are proposed as a result of the consultation exercise.

Conservation Area appraisals

- 3.24. Conservation Area Appraisals provide a statement of character and appearance for a Conservation Area along with a management plan for its conservation. Officers will prepare Conservation Area Appraisals for the Covert Conservation Area and the Thrifts Conservation Area; and an amended Appraisal for Chislehurst Road Conservation Area, based on the BEAMS report and engagement with relevant stakeholders as appropriate. These appraisals will be brought to a future meeting of the Development Control Committee for adoption.

4. POLICY IMPLICATIONS

- 4.1 A Conservation Area designation will be relevant in the determination of planning applications in the newly designated area. Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals on listed buildings and conservation areas. In respect of conservation areas, it requires that 'special attention be paid to the desirability of preserving or enhancing the character or appearance of that area.'
- 4.2 There are a number of Development Plan policies set out in the Local Plan and London Plan which would apply to proposals within a Conservation Area. Section 16 of the NPPF sets out national policy on how the historic environment should be conserved and enhanced.

5. FINANCIAL IMPLICATIONS

- 5.1 The designation of the new and amended Conservation Areas can be undertaken using existing resources.

6. LEGAL IMPLICATIONS

6.1 The formal process for designation will be completed in line with statutory requirements, in conjunction with the Council's legal services department.

<p>Non-Applicable Sections:</p>	<p>IMPACT ON VULNERABLE ADULTS AND CHILDREN</p> <p>PERSONNEL IMPLICATIONS</p> <p>PROCUREMENT IMPLICATIONS</p>
<p>Background Documents: (Access via Contact Officer)</p>	<p>Bromley Local Plan 2019 - https://www.bromley.gov.uk/download/downloads/id/4768/bromley_local_plan.pdf</p> <p>London Plan (adopted 2 March 2021), available from: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>National Planning Policy Framework (July 2021) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</p> <p>National Planning Practice Guidance - https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment</p> <p>'PETTS WOOD CONSERVATION AREAS', Development Control Committee 24 September 2020, available from: https://cds.bromley.gov.uk/documents/s50083375/PETTS%20WOOD%20CONSERVATION%20AREASPART%201%20REPORT%20TEMP%20LATE.pdf</p>