

Committee Date	21.04.2022	
Address	18 Longdon Wood Keston BR2 6EW	
Application Number	21/05069/FULL1	Officer - Susanna Stevenson
Ward	Bromley Common And Keston	
Proposal	Demolition of existing detached dwelling and erection of replacement two storey detached dwelling with integral double garage and single storey rear swimming pool projection.	
Applicant	Agent	
Mr Jack McCarthy	Mr Peter Hadley	
18 Longdon Wood Keston BR2 6EW	Robinson Escott Planning Downe House 303 High Street Orpington BR6 0NN	
Reason for referral to committee	Councillor call in	
	Call-In	Yes

RECOMMENDATION	REFUSE PLANNING PERMISSION
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<p>KEY DESIGNATIONS</p> <p>Conservation Area: Keston Park Article 4 Direction Biggin Hill Safeguarding Area London City Airport Safeguarding Smoke Control SCA 14</p>

Land use Details		
	Use Class or Use description	Floor space (GIA SQM)
Existing	Single dwelling (C3)	169 sqm
Proposed	Single dwelling (C3)	958 sqm

Residential Use					
	Number of bedrooms per unit				
	1	2	3	4 Plus	Total
Market				1	1
Affordable (shared ownership)					
Affordable (social rent)					
Total				1	1

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	4	4	N/A
Disabled car spaces	0	0	N/A
Cycle	0	0	0

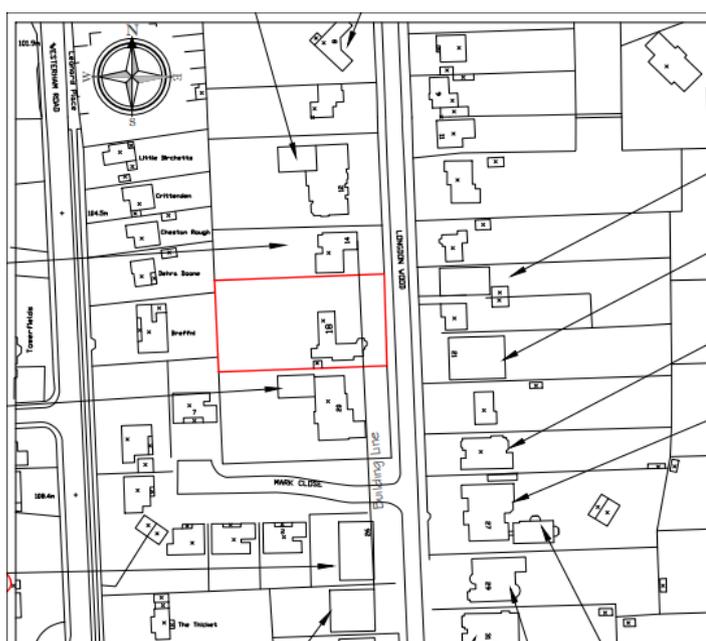
Electric car charging points	0 (application form response)
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Representation summary	Site notice displayed 1 st December 2021 Press advertisement published 8 th December 2021 Letters to neighbouring residents sent 25 th November 2021	
Total number of responses	0	
Number in support	N/A	
Number of objections	N/A	

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The existing site and the scale and siting of the dwelling in relation to it makes a positive contribution to the character and appearance of the Keston Park Conservation Area
- The demolition of the existing dwelling would be premature in the absence of an acceptable scheme for a replacement house
- The proposed replacement dwelling would be overly bulky and wide and would undermine the contribution that the existing site and dwelling make to the character and appearance of the conservation area
- The proposal would cause less than substantial harm to the designated heritage asset (the Conservation Area) to which there would be no public benefit outweighing that harm
- The proposal is therefore contrary to the aims and objectives of Section 16 of the National Planning Policy Framework (2021), Policy HC1, D3 and D4 of the London Plan and Policies 4, 8, 37 and 41 of the Bromley Local Plan, as well as the Keston Park Conservation Area SPG

2. LOCATION



- 2.1 The application site lies within the Keston Park Conservation Area and is located on the western side of Longdon Wood, a street characterised by detached dwellings situated in large plots.



Front of site

- 2.2 To the north of the site is the curtilage of No. 14 Longdon Wood. The site is bounded to the rear (west) by the rear gardens of Dehra Doone and Breffni, both of which front onto Westerham Road, and by the side boundary of No. 7 Marke Close, a cul-de-sac accessed from Longdon Wood.



North eastern side of site, 14 Londgon Wood adjacent

- 2.3 The site is rectangular and has an area of approx. 0.22 hectares, with a width of approx. 33.5m and a depth of approx. 64.5m, and is wider than the plots to the north and south.
- 2.4 TPO 1583 (confirmed 26.08.99) relates to 2 spruce trees within the front garden of the host property.

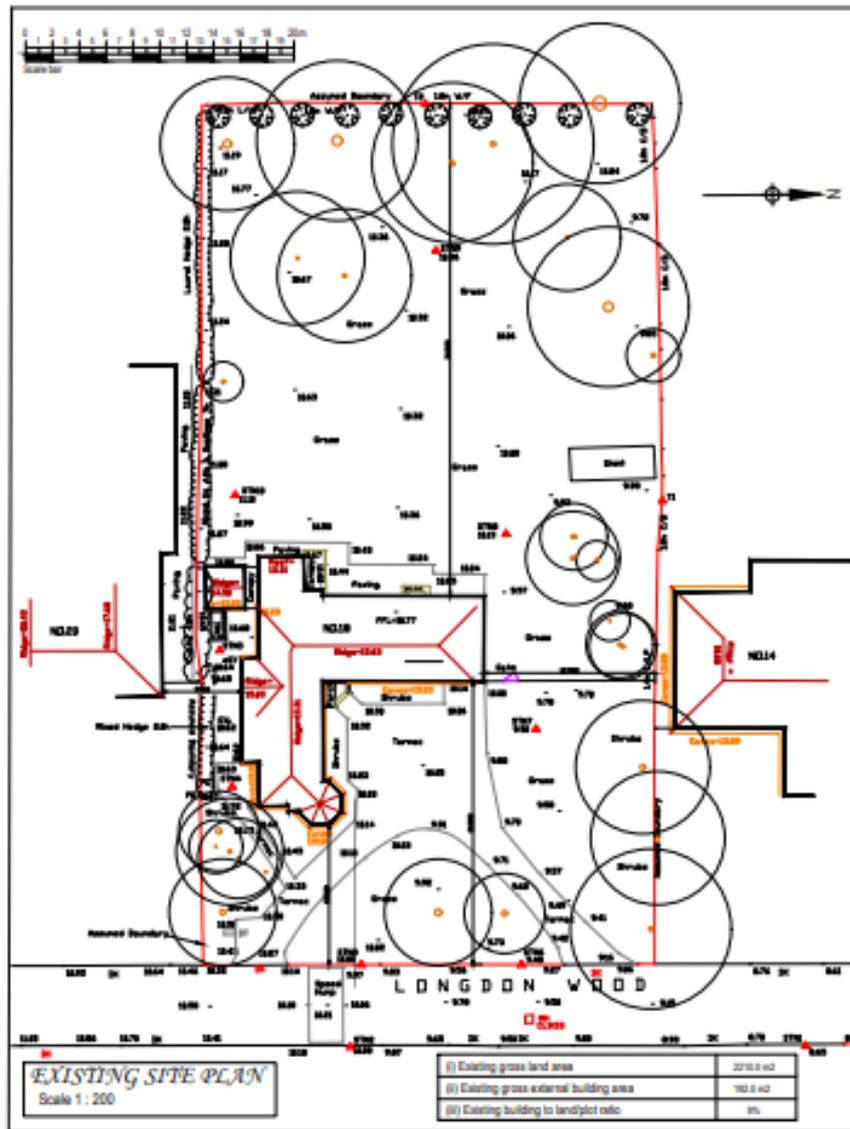


Site from south west, towards 20 Londgon Wood

2.5 The site is occupied by a detached single storey dwelling which has been extended in the past. The host dwelling is L-shaped and incorporates a tiled shallow pitched roof with curved profile towards the eaves, and is largely white rendered above a brick plinth and includes white rendered traditional chimneys.



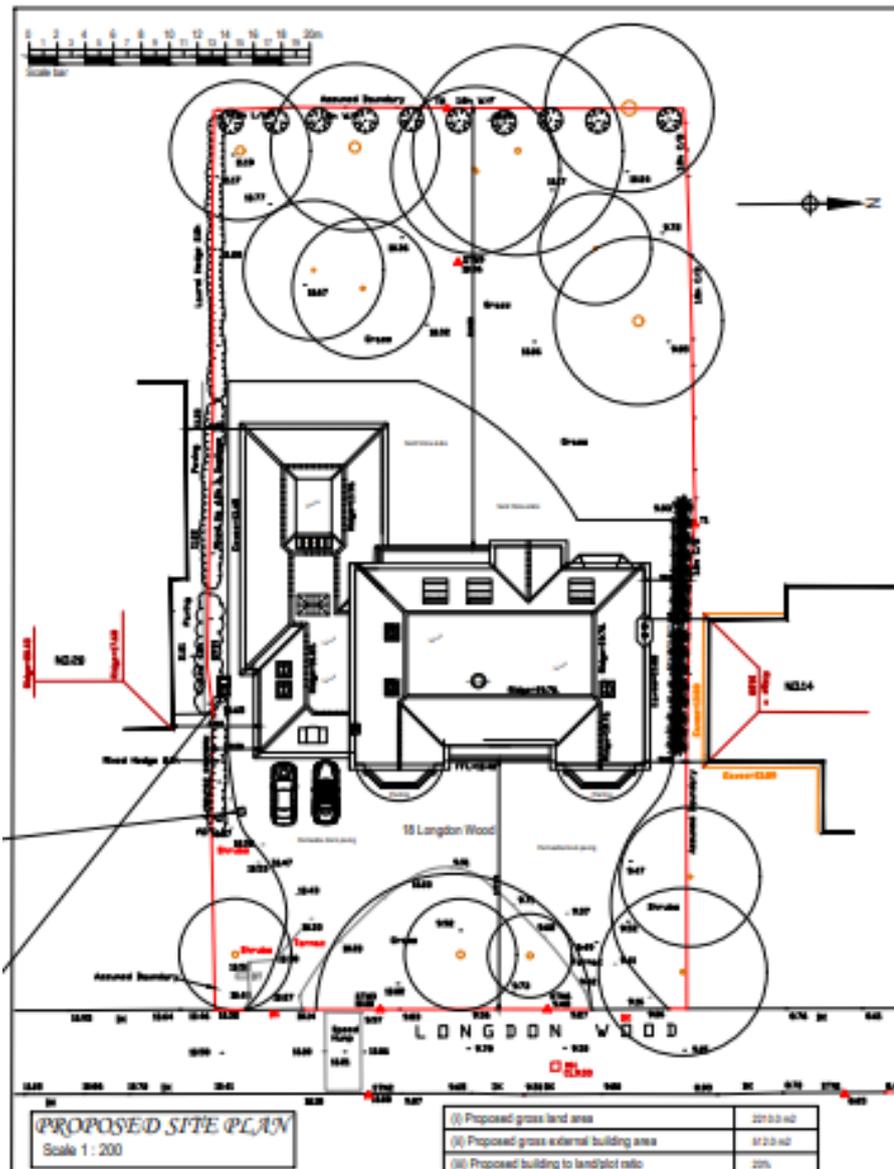
Existing front elevation/street scene



Existing site plan

3. PROPOSAL

- 3.1 Planning permission is sought for the demolition of the host dwelling and the construction of a replacement detached house which would be two/three storeys in height and would incorporate an attached double garage with accommodation above which would project at ground floor level to the rear to accommodate an inside swimming pool.



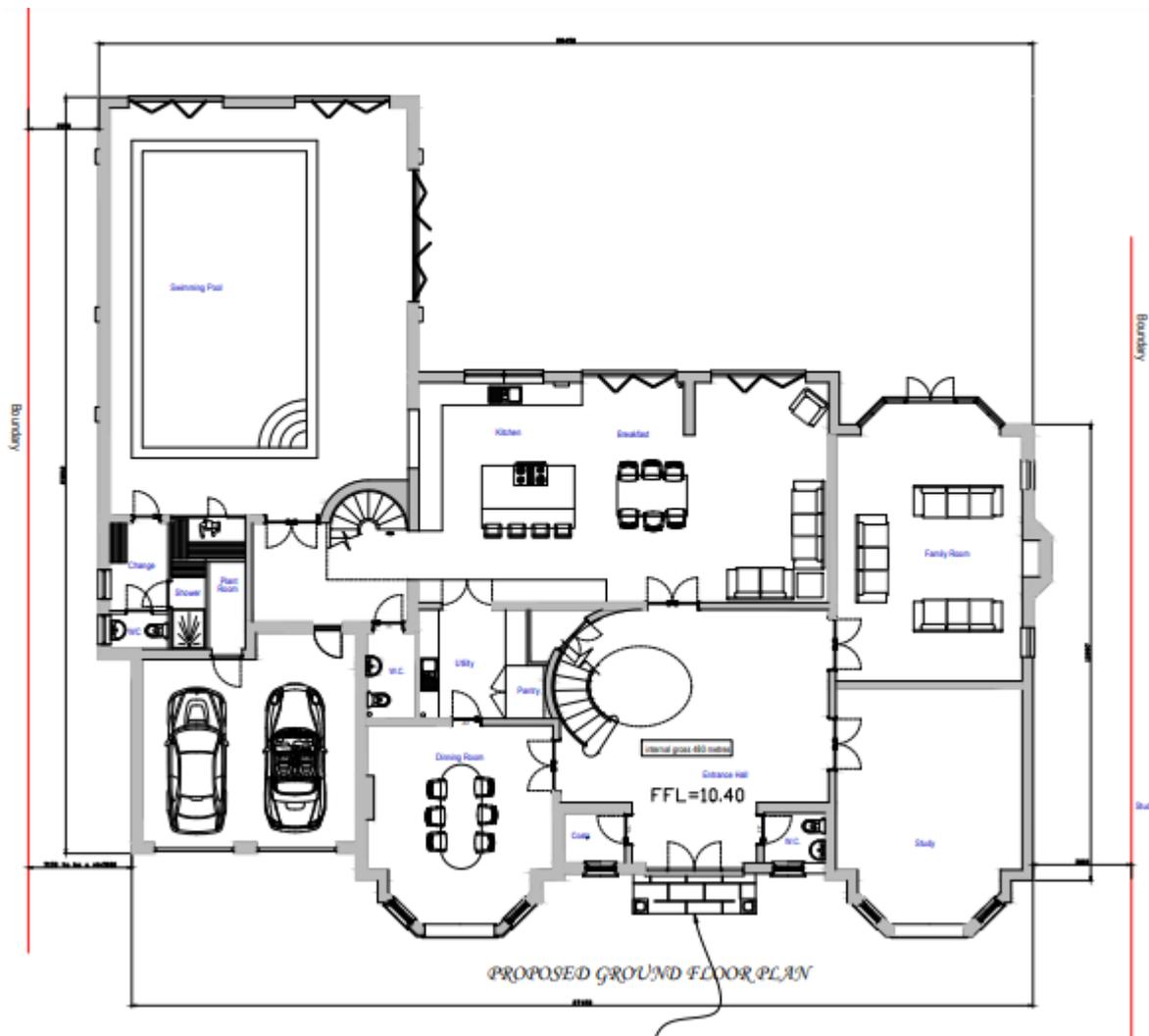
Proposed site plan

- 3.2 The proposal would incorporate accommodation within the second floor roofspace set beneath a crown roof with solar panels and incorporating three rear dormer projections.



Proposed front elevation/street scene

- 3.3 The first floor would accommodate 4 no. bedrooms within the main dwelling, with a large gym and games room above the garage/pool side element. At second floor level a further 2 no. bedrooms would be provided.



Proposed ground floor plan

- 3.4 3.1m side space would be retained to the northern boundary with No. 14. To the southern boundary, the front part of the garage would lie approx. 3.1m from the boundary, with the set-back pool room being sited closer to the boundary.

- 3.5 The proposed dwelling would be brick-faced with rendering between the two symmetrical front gable projections, each of which would incorporate clay tile-hanging with inset detailing. The roof would be constructed with hand-made clay plain roof tiles.
- 3.6 The height of the building to eaves level would be approx. 5.1m to the eaves of the main dwelling, with the height to eaves of the attached garage with first floor being approx. 3.6m. The height to the flat-roofed/crown roof section would be approx. 9.3m.
- 3.7 The dwelling would be approx. 14m in depth parallel with the northern boundary and 23.2m deep parallel with the southern boundary.
- 3.8 The application has been submitted with the following supporting documents:
- Heritage Impact Assessment
 - Planning, Design and Access Statement, including detailed analysis of development at other sites in the locality
 - Delegated reports on development at 7 Longdon Wood (2019), 21 Longdon Wood (2015), 26 Longdon Wood (2020) and 8 Longdon Wood (2019).
 - Appeal decision (2019) on 30 Forest Ridge
 - Appeal decision (2007) on 20 Longdon Wood
 - Site plan annotated to indicate planning history cases considered relevant within the immediate locality

4. RELEVANT PLANNING HISTORY

4.1 Under reference 84/00345/FULL planning permission was granted for the construction of a detached double garage.

4.2 Under reference 92/01718/FULL planning permission was refused for the construction of two detached five bedroom houses each with integral garage on the site of 16-18 Longdon Wood. Permission was refused on the ground:

“The proposal would constitute an overdevelopment of the site by reason of the amount of site coverage by buildings and hard surfaces and the proximity of the dwellings to the boundaries of the site and as such it would harm the character and appearance of the Keston Park Conservation Area, contrary to Policies H.2, E.1 and E.7 of the Bromley Borough Plan and the Deposit Draft of the Unitary Development Plan.”

4.3 Conservation Area consent was also refused under reference 92/1718:

“The demolition of the bungalow would be premature in the absence of planning permission for the redevelopment of the site and detrimental to the visual amenities of the Keston Park Conservation Area.”

- 4.4 Under reference 99/00590/TRE no objections were raised to the intention to fell 3 spruce trees and works to 2 spruce trees (this was an application relating to trees within Conservation Areas).
- 4.5 Under reference 00/01404/TREE no objections were raised for height reduction of the two Norway spruces in the front garden (this was an application relating to trees within Conservation Areas).
- 4.6 Under reference 00/01434/TPO consent was refused for the reduction of the height of one tree to previous reduction point and the balancing of the canopy (subject to TPO 1583 – T2).
- 4.7 Under reference 00/03459/TPO consent was refused for the thinning of the crowns of 2 spruce trees subject to TPO 1583.
- 4.8 Under reference 21/03969/TREE no objections were raised in respect of works to trees (other than the 2 no. protected tree at the front of the site).
- 4.9 The applicant has provided examples of development considered relevant to the current application/site within the local area/Keston Park Conservation Area, detailed on the submitted location plan and within supporting documents.

5. CONSULTATION SUMMARY

A) Statutory

- Highways No objection

The applicant is advised to satisfy themselves that they have a right of way over Longdon Wood which is a private road. The access and parking arrangements appear satisfactory/

- Drainage No objection

There is no public surface water sewer near the site. The applicant is required to make their own arrangement as to how to dispose of surface water run-off. A pre-commencement surface water drainage condition is recommended should planning permission be granted.

B) Local Groups

No comments received.

The applicant has provided correspondence between Keston Park (1975) Ltd and himself to confirm that the company's own planning committee have granted their approval in

principle for the proposal, referring to conditions including with regards to a private demolition and construction levy.

C) Adjoining Occupiers

No comments received.

6. POLICIES AND GUIDANCE

6.1 National Policy Framework 2021

6.2 The London Plan

- D1 London's form and characteristics
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D12 Fire safety
- HC1 Heritage conservation and growth
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI13 Sustainable drainage
- T5 Cycling
- T6 Car parking
- T6.1 Residential Parking

6.3 Mayor Supplementary Guidance

Housing SPG

6.4 Bromley Local Plan 2019

- 4 Housing Design
- 30 Parking
- 32 Road Safety
- 33 Access for All
- 37 General Design of Development
- 41 Conservation Areas
- 43 Trees in Conservation Areas
- 73 Development and Trees
- 77 Landscape Quality and Character
- 113 Waste Management in New Development

116 Sustainable Urban Drainage Systems
117 Water and Wastewater Infrastructure Capacity
123 Sustainable Design and Construction

6.5 Bromley Supplementary Guidance

SPG 1 – General Design Principles
SPG 2 – Residential Design Guidance
SPG for the Keston Park Conservation Area

6.6 Other Supplementary Guidance

Planning Practice Guidance (Historic Environment) updated on 23rd July 2019

7. ASSESSMENT

7.1 Design of development, demolition of existing house and impact on Conservation Area – Unacceptable

7.1.1 Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their setting should be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

7.1.2 Policy 41 of the Bromley Local Plan states that proposals for development in Conservation Areas should preserve and enhance its characteristics and appearance by respecting or complementing the layout, scale, form and materials of existing buildings and spaces; respecting and incorporating in the design existing landscape or other features that contribute to the character, appearance or historic value of the area; and using high quality materials.

7.1.3 Recent government guidance refers to the matter of cumulative harm to a designated heritage asset. In this case, the heritage asset is the Conservation Area. The guidance states at Paragraph 13:

“When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.”

7.1.4 Policy 37 relates to the general design of development and Policy 4 to Housing Design. Policy 37 states that all development proposals will be expected to be of a high standard of design and layout, and to meet a number of criteria, including that development should complement the scale, proportion and layout of adjacent

buildings and areas, and should positively contribute to the existing street scene and/or landscape. Development should respect non-designated heritage assets.

- 7.1.5 Policy 4 relates to housing design and states that the layout, buildings and space about buildings should be designed to a high quality, recognising and complementing the qualities of the surrounding areas.
- 7.1.6 The application has been submitted with a Heritage Statement which refers to the significance of the Conservation Area lying in its landscape, “its’ rather American feel” and its rooted associated with the previous Holwood House estate. The statement observes that there is an ‘evolved character’ to the estate, within which it is commented that the “mansion house type” is now firmly established. This assessment is based in part on comments within previous application reports and appeal decisions.
- 7.1.7 The statement concludes that the demolition of the dwelling will cause a low level of less than substantial harm to the significance of the conservation area which would be outweighed by the enhancement of the area brought about by the replacement building, which is referred to as comprising a detached Edwardian-style dwelling.
- 7.1.8 The Advisory Panel for Conservation Areas object to the proposal on the basis that the modest scale and spacious setting of the bungalow (which is one of the surviving original buildings) embody the aspirations and design concept of the Park as it was originally conceived and as led to the later conservation area designation.
- 7.1.9 They comment that the demolition of the dwelling would mean the loss of an original building which they consider to make a positive contribution to the character and appearance of the conservation area and which they consider a non-designated heritage asset in its own right.

The comments conclude:

“Given the degree of losses as highlighting by the applicant it is all the more important to retain these more modest original houses” going on to state that the replacement house would be an overdevelopment having a detrimental impact on the spatial quality that the CA designation seeks to preserve.”

- 7.1.10 Objections are also raised by the Conservation Officer on the basis that the proposal would result in less than substantial harm to a designated heritage asset and that this less than substantial harm is un-justified.
- 7.1.11 The comments received note the retained subordinate character of a low building with an associated low density, with attractive trees and open space. The scale of the replacement dwelling is considered much larger than the existing, it is noted and the submitted location plan highlights all the houses that have been redeveloped over the past 10-15 years.
- 7.1.12 Conservation Officer comments also refer to the Historic England guidance on the setting of designated heritage assets and to the recent Planning Practice Guidance on the Historic Environment which states that Local Planning Authorities may need

to consider the cumulative impact of permissions within a designated heritage asset as devaluing the historic character of that asset.

- 7.1.13 With regards to design, the Officer notes that the new house is very symmetrical and appears pseudo-Georgian which is inappropriate in the context of the original architectural language of Arts and Crafts inspired design. The building includes a crown roof which indicates an overly deep plan which again is inappropriate in the Conservation Area.
- 7.1.14 The application has been submitted with detailed analysis of other planning cases within the locality that are considered by the applicant to represent a precedent in terms of building development, demolition, as well as the assessment process with particular regard to weight afforded to the APCA and conservation officer comments in decisions made by the Local Planning Authority/Planning Inspectorate.
- 7.1.15 It is a fundamental principle that each case be considered on its merits and in relation to specific site characteristics – in this case not only the site, but the relationship between the site and its building, their combined contribution to the character and appearance of the Conservation Area and the impact of the proposal on that designated heritage asset as well as the wider visual amenities of the street scene and area in general.
- 7.1.16 With regards to site re-development, it is acknowledged that there are examples where original buildings have been demolished and replaced by new, larger buildings, including in recent years. It is seldom possible to make the case that permission should be granted or refused on the basis of what has happened at another site (as planning law requires that each application be considered on its individual merits). However, officers have reviewed the proposals and site characteristics referred to within more recent applications in the KPCA.
- 7.1.17 Focussing on these examples in particular, especially those within Longdon Wood:

7 Longdon Wood

Planning permission granted by delegated decision in August 2019. No objections from a conservation perspective, although the Advisory Panel did raise concerns. The existing dwelling comprised a 2 storey property within a narrower plot than the current application site. The proposed replacement building incorporated a substantial crown roof and 2 no. front dormers and was of asymmetrical design.



26 Longdon Wood



Original and approved front elevations 26 Longdon Wood

Planning permission (ref. 19/05034/FULL1 & 19/05034/RECON) granted for the demolition of the existing house 1960s and erection of a replacement house. The replacement dwelling is currently under construction and the site surrounded by construction hoarding. The pre-existing house was set over two storeys with a detached garage to the side. The revised scheme permitted in 2020 was for a substantial symmetrical dwelling with a central projecting gable, set over 2 storeys with accommodation at roof level. Objections were raised by APCA but no objections raised by the Conservation Officer who noted that the existing dwelling was part of a 1960s development and that the scheme had been reduced in scale compared to a previous submission. The design and scale were noted to be not dissimilar to other replacement dwellings in the area.

30 Forest Ridge

Appeal allowed under ref. 18/03957/FULL1 for the demolition of the existing two storey detached 5 bedroom dwelling and the erection of a replacement dwelling.



Pre-existing front elevation



Approved front elevation (allowed on appeal)

The Inspector opined that in their view “the significance of the CA derives from how the properties and the park have been developed within the landscape.” It was acknowledged that a building had existed on the site since the early phase of the park’s development, but the Inspector noted that the house had since been altered with the implementation of various planning permissions including a two storey and single storey extension to the rear, a single storey side extension, side and rear dormers and an ancillary outbuilding.

8 Longdon Wood

Planning permission refused in 2018 under reference 18/05619/FULL1 for the demolition of the existing detached dwelling, centrally positioned within its plot, and erection of a two storey dwelling with a plot approx. 6m narrow than the current application site. No objections from a conservation officer perspective, but objections were received from the Advisory Panel for Conservation Areas. The proposal was to replace an original single storey building with a two/three storey dwelling of similar proportions to that currently proposed and was refused on the basis of trees impact.



8 Longdon Wood



8 Longdon Wood, existing and proposed (refused under reference 18/02619/FULL1)

7.1.18 The planning history of the immediate conservation area locality presents what are referred to by the applicant as precedents for this current proposal; it also simultaneously demonstrates the extent to which there have been significant changes to the locality and why local planning authorities may need to consider the concept of “cumulative harm.”

7.1.19 In this specific case the main issues relate to the individual site, the existing building and the contribution these make to the qualities of the street scene and area in

general as well as to the character and appearance of the conservation area. The assessment relates fundamentally to the way in which this specific proposal on this specific site would impact on the conservation area and visual amenity.

7.1.20 The application site is generously wide and currently occupied by an (extended) original single storey building. Originally conceived, according to the Heritage Statement, as a double plot, the building was extended to the side when the double plot scheme was abandoned. Despite the extension of the original building to the side, the site is appreciably spacious, and provides a visual and welcoming break in the more uniform development of Longdon Wood in surrounding sites.

7.1.21 Open space is retained about the building which occupies a strong landscape setting. The site is dominated by the landscaping and the openness to the sides and around the dwelling. There are concerns regarding the scale, design and massing of the proposed replacement dwelling which would be disproportionate in the context of the existing site development and the valuable contribution made to the character of the area and the appearance of the street scene by the existing development/site ratio.

7.1.22 Side space would be provided which would generally meet the requirements for designated areas and would not be inconsistent with other development in the locality. However, the site is particularly wide, and the proposed dwelling appears to dominate it, with the width of the dwelling being stretched to fit the site proportions rather than allowing the retention of some of the expansive spaciousness currently characteristic of the site.



7.1.23 That there are examples of other site redevelopments within the locality is acknowledged. It is noted that as each site, dwelling, and contribution to the character and appearance of the conservation area differs subtly, the maxim that each case should be considered on its merits is underscored. The Keston Park

Conservation Area SPG refers to “the landscape dominance and individualistic lack of a common architectural theme” and development in the park being more characteristic of America than Britain. The proposed dwelling would lack individuality and the landscape dominance of the site would be undermined through the width of the proposed development on the site and the articulation/massing of the building.

- 7.1.24 The Heritage Statement submitted with the application states at 3.7 that the character of the conservation area “lies primarily in the quality of the relationship between buildings and spaces, rather than on the quality of the architecture itself.” This is consistent with the SPG and past appeal Inspector assessments - that much of the conservation area’s value comes from the spaces between and in front of buildings in tandem with the landscaping opportunities that this space affords.
- 7.1.25 The application site and host dwelling contributes to this character as a consequence of the low level of the building upon the site and the significant gaps between development on either side of the boundaries at first/second floor level. While the host building has been extended some considerable time ago, as is noted within the Heritage Statement, its general scale and siting in relation to the plot is of special interest in the extent to which it evidences the history of the estate and the evolution of development within it.
- 7.1.26 It is acknowledged that, as is stated within the Heritage Statement, Longdon Wood has rather more uniformity in siting and spacing than other more informal parts of the conservation area. However, that is not to say that the existing development and its relationship to the width and proportions of the site undermines the character of the conservation area – as stated above much of the value of the application site and dwelling and its contribution to the area comes from the generous proportions of the site in juxtaposition with the modest original building upon it. In contrast, the proposed development would encompass the width of the site, resulting in a dwelling of significant scale that would erode the existing space between development particularly with regards to either side of the northern boundary. The site would be building-dominated rather than landscape-dominated, and this would undermine the appearance of the site, its contribution to the visual amenities of the street scene and the character and appearance of the Conservation Area.
- 7.1.27 It is considered that the proposal would cause less than substantial harm under the definition provided by the NPPF which recognises three categories of harm: substantial harm, less than substantial harm and no harm. The PPG notes that in general terms, substantial harm is a high test and may not arise in many cases. The NPPF makes clear that any harm to a designated heritage asset requires clear and compelling justification. “Where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”
- 7.1.28 In terms of the general design of the dwelling, the width of the development is emphasised in the massing of the front/side elevation with the symmetrical and dominant front gables to either side of the main bulk of the dwelling, which in context with the bulky crown roof result in a squat and imposing development which would be visually over-dominant in the context of the site. It is noted that some articulation

is provided through the dropping of the height of development in the subservient swimming pool/garage wing of development, but this articulation is not considered to display the visual interest and individuality recognised within the modest Arts and Crafts origins of the parkland development.

- 7.1.29 The front gables and symmetrical appearance of the main bulk of the dwelling result in a design that is not reflective of the Arts and Crafts origins and architectural language of the locality. The design is described within the application submission as comprising an “evolved form of a detached Edwardian style” which references William and Mary as well as Queen Anne influences. The design includes materials of a high quality, but the grand, imposing and visually dominant appearance of the dwelling in contrast with the site’s existing modest building and the landscape emphasis of the existing site is considered unacceptable.
- 7.1.30 It is acknowledged that there is significant variety in the external appearance/design of dwellings in the locality, with this “individualistic” character being referred to within the Conservation Area SPG, which also refers to the landscape dominance of the character of the conservation area. The proposal appears to draw from other examples of mansion-style dwellings in the locality rather than responding to the characteristics and visual contribution of the existing plot and development.

7.2 Neighbourhood Amenity – Acceptable

- 7.2.1 Policy 37 of the Bromley Local Plan 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.
- 7.2.2 In terms of its relationship with neighbouring properties to the north and south the proposed dwelling would have no significant impact on the enjoyment and amenities of these dwellings. With regards to the siting of the dwelling in relation to properties at the rear, to the west of the site, in view of the generous proportions of the site it is not considered that the proposal would have any significant impact with regards to daylight, sunlight, overshadowing or visual impact. The proposal does include rear facing terraces at first/second floor but these are contained well within the proposed dwelling and positioned so as to minimise any impact associated with their use – with regards to loss of privacy or noise and disturbance.
- 7.2.3 Having regard to the above, it is considered that no significant loss of amenity with particular regard to light, outlook, prospect and privacy would arise from the proposed development.

7.3 Standard of outlook and amenity for future occupiers - Acceptable

- 7.3.1 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.

- 7.3.2 Policy 4 of the Bromley Local Plan sets out the requirements for new residential development to ensure a good standard of amenity and refers to the London Plan Housing Supplementary Planning Guidance. The 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.
- 7.3.3 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 access arrangements to reflect the Governments National Technical Housing Standards.
- 7.3.4 The proposed new dwelling would comply with the minimum standards as set out within the National Technical Housing Standards.
- 7.3.5 The shape, room size and layout of the rooms are considered satisfactory and all habitable rooms would contain at least one window that would ensure it would achieve a good outlook and light.
- 7.3.6 Amenity space is provided by way of the existing garden space to the rear which would provide an acceptable amount of private amenity space in accordance with the Mayors Housing SPG.
- 7.3.7 Having regard to all the above, the proposal would meet the minimum standards as outlined within Policy D6 of the London Plan, Policy 4 of the Bromley Local Plan, the Mayors Housing SPG and The National Technical Housing Standards.

7.4 **Highways - Acceptable**

- 7.4.1 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 transport issues should be considered from the earliest stage of both plan making and when formulating development proposals and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 7.4.2 London Plan and Bromley Local Plan Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Car parking standards within the London Plan and Bromley Local Plan should be used as a basis for assessment.

7.4.3 The proposal is for the demolition of the existing single dwellinghouse and construction of a new single dwellinghouse. The application site is located on Longdon Wood which is shown in the Council's records as a private road.

7.4.4 The site would retain adequate off-street parking. The Council's Highways Officer has raised no objections to the proposal and it is considered that in terms of highways matters the proposal would be acceptable.

7.5 **Trees – Acceptable**

7.5.1 Policy 73 (Development and Trees) states that proposals for new development will be required to take particular account of existing trees on the site and adjoining land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained.

7.5.2 Policy 43 of the Bromley Local Plan refers specifically to Trees in Conservation Areas and states that development will not be permitted if it will damage or lead to the loss of one or more significant and/or important trees in a Conservation Area, unless a) the removal of the tree is necessary in the interest of good arboriculture practice, or b) the benefit of the development outweighs the amenity value of the tree.

7.5.3 Policy 77 refers more generally to landscape quality and character and seeks to safeguard the quality and character of the local landscape.

7.5.4 Comments have been received from the Council's Trees Officer referring to the application being supported by an Arboricultural Report. A detailed Arboricultural Method Statement has been recommended. Landscaping details would be a requirement of any permission for a proposal of this scale. It is recommended that should permission be granted a pre-commencement condition be imposed relating to the depth, extent and means of excavation of the foundations, along with a pre-above ground works condition requiring the submission and approval of full landscaping details (hard and soft landscaping).

7.6 **CIL**

7.6.1 The Mayor of London's CIL and Bromley's Local CIL are both a material consideration. CIL is payable on this application and the applicant has submitted the relevant form.

8. CONCLUSION

8.1 Having had regard to the above, it is considered that the proposed development is unacceptable.

8.2 It is acknowledged that the proposed development would not give rise to any significant loss of residential amenity to neighbouring occupiers and would not result in any harmful impact to levels of on-street parking within the area. It would also

provide a good standard of accommodation for prospective occupiers and, subject to conditions, detailed tree protection measures and landscaping proposals would be capable of being secured.

- 8.3 However, it is not considered that these matters would outweigh the harm that the proposed replacement dwelling would cause to the designated heritage asset (the Keston Park Conservation Area). Whilst the harm would be less than substantial, as stated within the NPPF, this harm should be weighed against the public benefits of the proposal, of which there are considered to be none.
- 8.4 The proposed replacement dwelling would also be excessive in width, and would include an overly large crown roof which would neither preserve or enhance the character and appearance of the Keston Park Conservation Area within which it lies. The site would be dominated by the building, rather than by the landscape. Furthermore, it is considered that the design of the dwelling would not sufficiently respond to the Arts and Crafts architectural “language” of the locality.
- 8.5 Having regard to this specific plot, the fact that the proposal would replace an existing single storey dwelling of modest proportions consistent with the original layout of development in the park setting, and in view of the scale and bulk of the proposed replacement dwelling, it is considered that the proposal does not successfully respond to the characteristics of the site and its setting within the conservation area.
- 8.6 The proposal is therefore contrary to the aims and objectives of Section 16 of the National Planning Policy Framework (2021), Policy HC1, D3 and D4 of the London Plan and Policies 4, 8, 37 and 41 of the Bromley Local Plan, as well as the Keston Park Conservation Area SPG. The demolition of the existing host dwelling would be premature in the absence of an acceptable scheme for the construction of a replacement dwelling.
- 8.7 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

For the following reasons:

1. The existing building and its relationship to the host site makes a positive contribution to the Keston Park Conservation Area and its demolition in the absence of an acceptable scheme for the construction of a replacement dwelling would have a detrimental impact on the character and appearance of the Conservation Area generally, thereby contrary to the aims and objectives of Section 16 of the National Planning Policy Framework, Policy HC1 of the London Plan and Policy 41 of the Bromley Local Plan.
2. The proposed replacement building by reason of its design, scale, bulk and massing in relation to the width and proportions of the host site and including an overly large crown roof design would neither preserve nor enhance the character and appearance of the Keston Park Conservation Area, thereby contrary to the aims and objectives of Section 16 of the

National Planning Policy Framework, Policies HC1, D3 and D4 of the London Plan, Policies 4, 37 and 41 of the Bromley Local Plan, and the Keston Park Conservation Area Supplementary Planning Guidance.