

<b>Committee Date</b>	15.09.2022	
<b>Address</b>	Glendale Holwood Park Avenue Orpington BR6 8NG	
<b>Application Number</b>	22/01141/FULL1	<b>Officer</b> - Case Management Team
<b>Ward</b>	Bromley Common And Holwood	
<b>Proposal</b>	Demolition of existing dwelling and detached triple garage, and erection of replacement two storey detached 8 bedroom dwelling with accommodation in roof space, basement accommodation including car parking, single storey rear pool projection, and garden shed and BBQ/dining shelter in rear garden	
<b>Applicant</b>	<b>Agent</b>	
Mr & Mrs Elswood	Mr Peter Hadley	
Glendale Holwood Park Avenue Orpington BR6 8NG	Robinson Escott Planning Downe House 303 High Street Orpington BR6 0NN	
<b>Reason for referral to committee</b>	Call-In	<b>Councillor call in</b> Yes

<b>RECOMMENDATION</b>	<b>APPLICATION REFUSED</b>
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<p><b>KEY DESIGNATIONS</b></p> <p>Conservation Area: Keston Park  Article 4 Direction  Biggin Hill Safeguarding Area  London City Airport Safeguarding  Open Space Deficiency  Smoke Control SCA 14</p>
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<b>Land use Details</b>		
	Use Class or Use description	Floor space (GIA SQM)
Existing	Residential (Class C3)	698.5
Proposed	Residential (Class C3)	1666

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

<b>Vehicle parking</b>	Existing number of spaces	Total including retained	proposed spaces	Difference in spaces (+ or -)
Standard car spaces	6	6		0
Disabled car spaces	0	0		0
Cycle	0	0		0

<b>Electric car charging points</b>	1 (active)
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**Photograph 1: Front view as existing**



**Photograph 2: Rear view as existing**

### 3. PROPOSAL

- 3.1 The application proposes the demolition of the existing dwelling and detached garage, and the erection of a replacement two storey detached 8 bedroom dwelling with accommodation in roof space, basement accommodation including car parking, single storey rear pool projection, and garden shed and BBQ/dining shelter in rear garden.
- 3.2 The application submission describes the proposed replacement dwelling as having been designed in a symmetrical neoclassical form, essentially Palladian in inspiration, with a main block of seven bays facing Holwood Park Avenue, the central five bays of which are set forward under a pediment with a deep entablature and giant tetrastyle pilasters. A hipped roof is proposed on the main block, behind a parapet. All the windows are of sash type. External walls will be of facing brickwork and Portland cast stone, with rusticated quoins. Two symmetrical pedimented pavilions will be attached to each side, each of two bays, with full-height arcaded openings and pilasters at ground floor.
- 3.3 The proposed dwelling would have a maximum width of 33m, a height from ground level of 10.2m and total depth (including the single storey rear element for the swimming pool) of 30m. The summer house would be positioned alongside the northern flank boundary and have a maximum height of 4m and a width of 4.6m. The outdoor dining/BBQ area would comprise a raised slab measuring 6m x 6.26m, with a covered cooking area and open dining area and would be positioned to the rear of the swimming pool element.



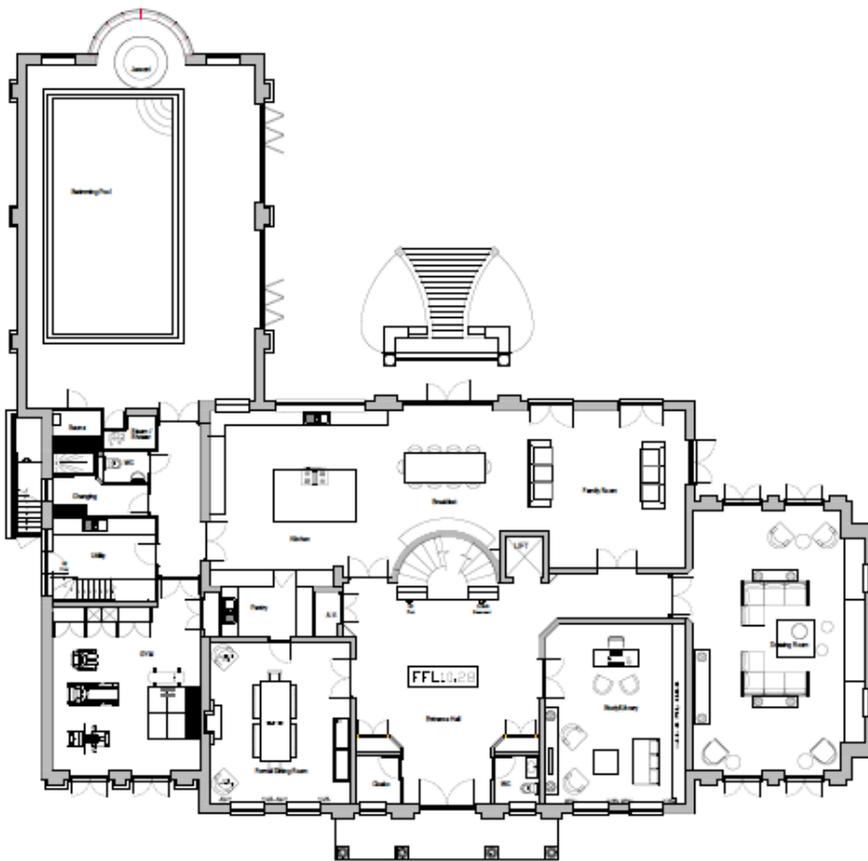
**Figure 2: Proposed front elevation**

*DE ELEVATION*



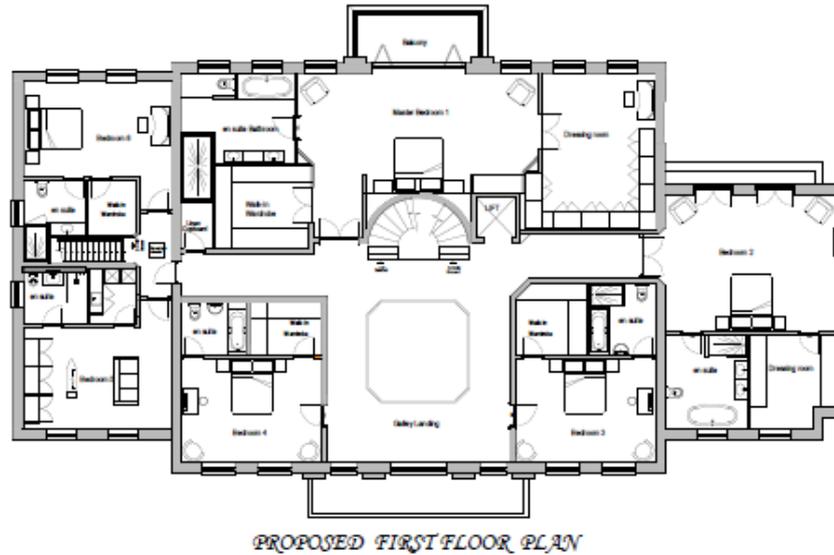
*PROPOSED SOUTH EAST REAR ELEVATION*

**Figure 3: Proposed rear elevation**



*PROPOSED GROUND FLOOR PLAN*

**Figure 4: Proposed ground floor plan**



**Figure 5: Proposed first floor plan**

#### **4. RELEVANT PLANNING HISTORY**

00/01122/FULL1	Single storey rear extension for conservatory - PERMITTED
96/01371/FUL	Front boundary wall piers and gates - PERMITTED
96/00248/FUL	Detached triple garage - PERMITTED
95/02030/FUL	First floor front and rear extensions, addition of pitched roof to existing flat roof and elevational alterations - PERMITTED
95/02031/CON	Demolition of sloping roof and part rear wall and removal of front dormer - CONSERVATION AREA CONSENT GRANTED
95/01362/LBC	Demolition of front gable and part rear wall and removal of front dormers - CONSERVATION AREA CONSENT REFUSED
95/01372/FUL	Detached double garage - PERMITTED
95/01373/FUL	First floor front and rear extensions addition of pitched roof to existing flat roof and elevational alterations - REFUSED

## 5. CONSULTATION SUMMARY

### A) Statutory

#### Thames Water – NO OBJECTION

- Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

#### LBB Highways – NO OBJECTION

- Holwood Park Avenue is a private road. The proposed dwelling has the same access arrangements as the existing. There is ample parking provided including a basement parking area. I would have no objection to the application.

#### LBB Drainage – NO OBJECTION

- Please impose standard condition regarding surface water drainage.

#### LBB Trees Officer – NO OBJECTION

- The property is located in the local conservation area, applying broad tree protection. Tree constraints have been addressed by the submission of an Arboricultural Report. Some technical specifications have been referred to within the report and a method statement alluded to. Supervision will form a key part of implementation and the arboricultural consultant will need to be retained throughout the project. Standard conditions regarding Tree Protection and Landscaping is requested.

### B) Local Groups

- No local groups commented.

### C) Adjoining Occupiers

#### Objections

- Property sited too far to the north, should be positioned centrally as per others in Holwood Park Avenue (addressed in para 7.2.2)
- Siting and increase in scale will result in shadowing over the neighbouring garden (addressed in para 7.2.2)

- The swimming pool complex is also sited alongside boundary as is the outdoor BBQ kitchen, some 30 meters to the rear (addressed in para 7.2.2)
- Both of these structures will impact neighbouring amenity space, namely the quiet enjoyment of the garden (addressed in para 7.2.2)
- Concern regarding potential loss of yew trees to facilitate swimming pool construction (addressed in para 7.5.4)

### Support

- No objection in principle
- Development is appropriate for the plot and positively contribute to the road and Keston Park Estate
- High quality design and similar to others in Holwood Park Avenue
- Architectural merit and scale is in keeping with other houses in the street and the approved dwelling at 30 Forest Ridge that was allowed on appeal.
- The proposed dwelling, although substantial would respond to the characteristics of the site with the existing house being very large in terms of its overall, scale and height
- The new dwelling would sit comfortably with the street scene and would enhance the character of this part of Keston Park.
- The application is noted to have been accompanied by a detailed tree report that confirms that all important landscaping including important landscaping on the front of the property is to be preserved.
- The new dwelling would sit comfortably with the site, the existing house has been extended and altered over time like many houses that have been granted permission to be replaced within the road and no objections are raised to its demolition.

## **6. POLICIES AND GUIDANCE**

### **National Planning Policy Framework (NPPF) 2021**

### **National Planning Practice Guidance (NPPG)**

#### **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

## **Mayor Supplementary Guidance**

Housing SPG

## **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

## **Bromley Supplementary Guidance**

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

## **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 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 Keston Park Conservation Area SPG includes the following guidance of relevance to this proposal:

*Para 2.3: - Although the Arcadian estate that resulted is similar to estates that were produced by developers within the Arts & Crafts or Garden City movements, it appears that it also paid reference to early 20th century suburban developments in the United States. Frederick Rogers had observed such estates whilst on a world tour in 1911. The development density is low, even by the standards of the most generous of British developers, mirroring the approach taken on the fringes of American cities where land was more plentiful and lower in price. The landscape dominance and the individualistic lack of a common architectural theme within the estate are also far more characteristic of America than Britain.*

*Para 3.19 - There are a number of buildings that make a positive contribution towards the character or appearance of the estate. Every effort should be made to retain these buildings and to ensure that characteristic details are not lost. The Council will advise in any given case whether it feels a building makes a positive contribution. Where a building is not identified in this way, there is no obstacle in principle to its demolition and replacement, subject to the satisfactory design of a replacement and the submission of a detailed landscape proposal, demonstrating that any replacement dwelling would sit well within the established "strong landscape framework". Particular attention should be given to the maximising of front and side space and reducing the visibility of the proposed dwelling from neighbouring properties."*

- 7.1.7 The application has been submitted with a Heritage Statement which considers that the significance of the Conservation Area, lies primarily in the quality of the relationship between buildings and spaces and how the properties and park have been developed within the landscape as part of the former Holwood House estate, rather than on the quality of the architecture itself. The statement goes on to say that this character has survived, and in many ways benefitted from, managed change. It is a sensitive balance, but it can absorb further modification over time, and it is important that it does not become fossilised or fixed at a single point in time. The Statement considers further that Holwood Park Avenue is capable of absorbing change without affecting the all-important landscape relationship with the former Park, and notes that it has already evolved considerably, since the 1920s.
- 7.1.8 The Statement considers that Glendale lacks the quality to be considered as a heritage asset in its own right. With no particular historical associations on which to draw, it is of modest heritage interest and makes an insufficient contribution to the character or appearance of Keston Park Conservation Area for there to be an automatic presumption in favour of its preservation. The overall conclusion of the applicant's assessment of the heritage impacts is that the proposal will be to remove an altered and eroded building and replace it with one that better suits the evolved character of the estate. The applicant concludes that there will be no residual harm to consider within the context of paragraphs 201 or 202 of the NPPF, and there will be preservation for the purposes of the council's duty under section 72(1) of the Act.
- 7.1.9 It is further acknowledged that there are a number of examples of replacement dwellings within the Conservation Area. Indeed in support of the proposal, the applicant's Planning Statement refers to other examples of substantial and individually designed new homes in close proximity to the application site. Notwithstanding the principle that each application must be assessed on its individual planning merits having regard to the specific details of the site and proposals in question, the specific cases have been set out below along with officer commentary.

#### Courtways, Holwood Park Avenue

- 7.1.10 Planning permission granted at appeal for a replacement dwelling in 2012 (LBB ref. 11/03468/FULL1). The Council had raised objections to the loss of the existing dwelling which was considered to make a positive contribution to the Conservation Area. At appeal, the Inspector considered that the original character of the dwelling had been eroded by previous extensions and alterations, including a modern rendered finish and UPVC windows, and concluded that the proposed replacement dwelling would be appropriate to its location and not amount to an overdevelopment.



### Mundendorrie, Holwood Park Avenue

7.1.11 Planning permission granted for a replacement 7 bedroom dwelling in 2014 (application ref. 14/01371/FULL1). In that case, the principle of the replacement of the existing dwelling had already been established with previous permissions originating in 2008.



### Rivenhall, Holwood Park Avenue

7.1.12 Planning permission granted for replacement dwelling in 2016 (application ref. 16/01216/FULL1). In granting planning permission it was noted that the dwelling would be at the end of the row of houses in Holwood Park Avenue with generous front boundary screening, and would be set well back from the front boundary in combination with the generously wide plot width that would mitigate the visual impact of the proposal.



Woodlands, Holwood Park Avenue

7.1.13 Planning permission granted for a replacement dwelling (application ref. 19/02269/FULL1).



7.1.14 Permission had been previously granted in 2016 for a similar application, following the refusal and dismissal at appeal of an earlier proposal for a replacement dwelling in 2015/16 (LBB ref. 15/03657/FULL1). In dismissing that appeal the Inspector concluded that the proposal to demolish the existing house and replace it with one influenced by Neo Classical design would therefore conform to the SPG and given the lower number of buildings on the road influenced by Neo Classical Design then would maintain the diverse appearance in the Park. However, the overall conclusion was that the specific proposal submitted for consideration would, given its design, have appeared unduly dominant in the street scene, creating a visually harmful, unique and obtrusive feature. The subsequent application submitted under ref. 16/03654/FULL1 was found to constitute an acceptable replacement dwelling.

Shirley, Holwood Park Avenue

7.1.15 Planning permission granted for replacement dwelling (Application ref. 20/02453/FULL1). Objections had been received from APCA and the Conservation Officer, and the application was recommended for refusal on the basis of the harm

that would be caused to the Conservation Area. However having considered the merits of the application Members of Plans Sub-Committee No.1 (at the meeting held on 26.11.2020) considered that the existing dwelling did not positively contribute to the Conservation Area and that the design, siting and spatial distances of the proposed replacement dwelling would not harm or appear out of keeping with the character and appearance of the Conservation Area and resolved to grant planning permission accordingly.



### 30 Forest Ridge

7.1.16 Planning permission granted at appeal for a replacement dwelling, of two alternative designs (LBB refs. 18/03957/FULL1 and 18/05640/FULL1).

7.1.17 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.



## *Analysis*

7.1.18 The Advisory Panel for Conservation Areas has reviewed the application and object to the proposal. They consider that whilst the host building has been altered it clearly still makes a positive contribution to the character and appearance of the Conservation Area in the originality of its design and relationship to many other houses in the Park. The building is one of the originals designed within the ethos of Keston Park of low-density individualistic development with a traditional and Arts & Crafts references in a strong landscape and spatial setting. This is described in the SPG para 2.3. The Panel consider that the proposed replacement is an overdevelopment causing loss of the spatial standard of the park and of a design quite out of character with the CA characteristics as outlined in the SPG.

7.1.19 The Council's Conservation Officer has reviewed the application and carried out a site visit. Objections are raised on the basis that the current house has an attractive historic asymmetrical character and appearance with different roof slopes on visually attractive different planes, attractive swept eaves, prominent tile creasing, English brick bond visible on the prominent front buttress features and an attractive assortment of front gables. The current house does undoubtedly have some historic significance as it dates to the 1920s and is therefore one of the original buildings in the Conservation Area.

7.1.20 The Conservation Officer considers that the proposed building is too austere and grand for these surroundings, being too large and out of proportion with the street scene and the cumulative harm caused by this proposal as outlined in planning policy guidance para 013 is harmful. The destruction of many of these historically and architecturally important interesting, uncharacteristic houses is, in the view of the Conservation Officer, eroding the significance of this Conservation Area. The scale of harm according to the language in the Government's National Planning Policy Framework is 'less than substantial' in the view of the Conservation Officer.

7.1.21 It is clearly the case that a number of dwellings in the immediate vicinity of the site have been given planning permission for demolition and replacement, including replacement dwellings of neo-classical design as outlined above. Indeed previous decisions by Planning Inspectors have acknowledged the content of the Keston Park Conservation Area SPG which identifies the significance of the Conservation Area as being derived from its landscape qualities and individualistic designs of dwellings. In determining the appeal in relation to 'Woodlands' as mentioned above (APP/G5180/W/15/3140187), the Inspector commented as follows:

*3. "The landscape from Holwood Park has been incorporated into a high quality built development, allowing scope for the construction of large and individualistic private homes in a manner typical of American suburban development. No two houses are the same, and most are subordinate to the mature woodland landscape setting of the park. Design and construction has tended to be influenced by the Arts & Crafts movement (resulting in buildings with an informal farm or cottage appearance) or neo Classical tradition (tending to be more formal, symmetrical and based on Greek and*

*Roman architecture as reinterpreted in-Europe and North America during and after the 18th century)”*

*4. The majority of properties on Holwood Park Avenue have been influenced by the Arts and Crafts movement. However there are some examples of neo-classical design. All the houses are set in large plots with significant planting and trees creating a landscaped setting...”*

7.1.22 The application site is currently occupied by a substantial detached dwellinghouse set over two storeys with roofspace accommodation. The dwelling does have a pleasing and distinctive appearance, derived from its Arts and Crafts style and is considered to sit well in this landscaped setting as a subordinate backdrop to the two substantial Cedars at the front of the site. It is clear that the house has been altered (see planning history section above) but it does still retain a very clear Arts and Crafts style appropriate to its setting and contributes positively to the character of the Conservation Area.

7.1.23 The Conservation Officer considers that the proposed replacement would be too grand and austere for the surroundings, and whilst in terms of architecture it is acknowledged that Keston Park does display a mix of styles including dwellings of neo-classical design as illustrated elsewhere in this report, on this site the formality and symmetry of the proposal would represent a stark contrast to the existing dwelling and its characteristics as described above. It must also be noted that the individuality in designs as referenced in the SPG at para 2.3 is a key characteristic of the Conservation Area. It is not clear how this proposal provides an individual design in response, noting the other examples of neo-classical dwellings permitted in the Park, in particular those at 30 Forest Ridge which are notably of similar form to this current proposal.

7.1.24 It is also necessary to make an assessment as to how the much-enlarged replacement dwelling would sit within its plot and the wider landscape setting of the Park. The existing plot is notably wider than those immediately surrounding it, with the existing dwelling positioned towards the northern flank boundary. Whilst the existing triple garage is positioned between the southern flank wall of the house and the southern boundary it is of single storey construction and serves to preserve the sense of spaciousness to the south which is a distinct characteristic of this particular plot and contributes the setting of the Conservation Area. The proposed dwelling would occupy a much greater proportion of the width of the site, reducing the separation to the flank boundary from 23.5m to 13m and whilst being set slightly further back within the plot than the existing dwelling (by around 3.5m) would, in combination with the neo-classical architectural style adopted, appear as an unduly dominant form of development which would fail to preserve or enhance the character and appearance of the Conservation Area. Whilst the separation far exceeds the minimum requirements set out in Local Plan Policy 8, the increased width of the dwelling towards the southern boundary would be harmful in this instance where

higher standards of separation are characteristic of the highly dispersed setting of the Conservation Area.

7.1.25 Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. 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."

7.1.26 In summary, it is not considered that the proposal provides an appropriate response to the landscape setting of this specific site. The existing building is considered to make a positive contribution to the character and appearance of the Conservation Area in terms of its appearance, scale and the relationship with its setting including the generous separation to the southern side of the plot. The proposed replacement would be too grand and austere in this setting, dominating the site, and would not accord with the principle of individualistic design noted in the SPG. Accordingly it is considered that the proposal would fail to preserve or enhance the character and appearance of the Conservation Area.

## **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 property to the south the proposed dwelling would have no significant impact on the enjoyment and amenities of this dwelling, given the degree of separation that would be retained to the southern flank boundary. The property would, as per the existing dwelling, continue to be positioned closer to the northern site boundary but it is not considered that the main bulk of the dwelling would give rise to a significantly greater impact than existing. It is noted that objection comments have been received from the adjacent property to the north with particular regard to the swimming pool projection and the outdoor dining/BBQ area. The pool enclosure would result in a significant rearward projection but it would be limited to single storey construction and well separated from the flank boundary, providing an opportunity for existing planting along that boundary to be retained. The BBQ/dining area and summer house are modest structures and their use is not considered to give rise to any impacts on amenity above that which would normally be expected in a domestic setting such as this.

7.2.3 With regards to the siting of the dwelling in relation to properties at the rear, given 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.

7.2.4 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.

7.3.4 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.

7.3.5 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.

7.3.6 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 Holwood Park Avenue which is shown in the Council's records as a private road. 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 advising that the property is located in the local Conservation Area, applying broad tree protection. Tree constraints have been addressed by the submission of an Arboricultural Report. Some technical specifications have been referred to within the report and a method statement alluded to. Supervision will form a key part of implementation and the

arboricultural consultant will need to be retained throughout the project. Landscaping details would be a requirement of any permission for a proposal of this scale. Standard conditions would be recommended in the event that the application were considered to be acceptable overall.

## **7.6 Other Matters - Acceptable**

### Drainage

- 7.6.1 The application has been reviewed by the Council's Drainage Officer and referred to Thames Water for comment. Subject to a standard condition and informative being included in any grant of planning permission no objections are raised.

### Community Infrastructure Levy (CIL)

- 7.6.2 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 regard to this specific plot, the fact that the proposal would replace an existing Arts and Crafts dwelling which retains a large separation to the boundary consistent with the original layout of development in the park setting, and in view of the design, 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.
- 8.2 The proposed development would provide a good standard of accommodation for prospective occupiers and not give rise to any significant loss of residential amenity to neighbouring occupiers. No technical highways or drainage objections are raised 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 it is considered that 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 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.

- 8.5 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**

### **Reasons for refusal:**

- 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 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.**