

<b>Committee Date</b>	22.02.2024	
<b>Address</b>	Car Park High Street West Wickham	
<b>Application Number</b>	23/04247/FULL2	<b>Officer</b> - Susanna Stevenson
<b>Ward</b>	West Wickham	
<b>Proposal</b>	Change of use of 14 car parking spaces (bays) in a car park to be used as space for a car wash including container for storage and staff office.	
<b>Applicant</b>	<b>Agent</b>	
APCOA Parking (UK) Ltd	Mr Neil Jones	
c/o agent NL Jones Planning Duke House, Duke Street Skipton BD23 2HQ United Kingdom	Duke House Business Hub Duke Street Skipton BD23 2HQ	
<b>Reason for referral to committee</b>	Council-owned site and Call in.	<b>Councillor call in</b> Yes – <b>Cllr Mark Brock</b> - Loss of further parking spaces to the High Street Loss of amenity for the residents that this will directly affect (noise, spray etc.). Call in conditional – should it be recommended that planning permission be granted.

<b>RECOMMENDATION</b>	Application Refused
-----------------------	---------------------

<p><b>KEY DESIGNATIONS</b></p> <p>Biggin Hill Safeguarding Area Open Space Deficiency RAF Birdstrike Consult Smoke Control SCA 51 Town Centre Boundaries</p>
--

Land use Details	
Use Class or Use description	Public surface car park

Representation summary	Local residents were notified of the application on 21 <sup>st</sup> November 2023.	
Total number of responses	221	
Number in support	4	
Number of objections	217	

## 1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- Inadequate information has been provided with regards to the noise and general disturbance associated with the proposed car wash and the impact on the residential amenities of neighbouring dwellings.
- Insufficient information has been provided with regards to the impact of the proposal on the typical usage/parking demand of the car park, with regards to congestion on the access, the loss/impact on disabled parking bays and with regards to the safety of pedestrians and car park users.

## 2. LOCATION



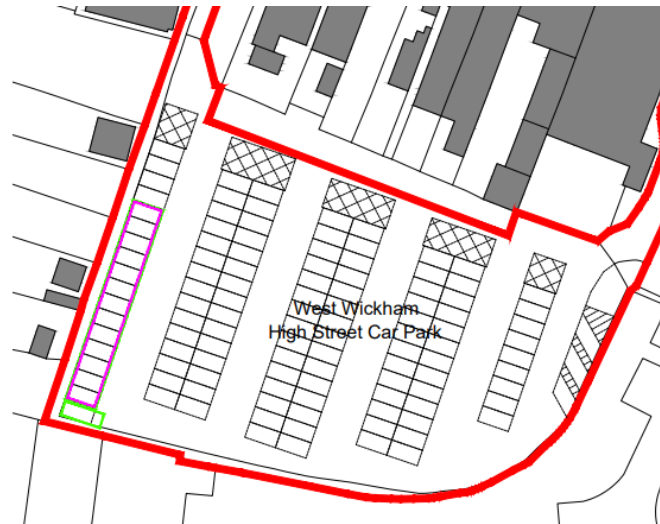
**Figure 1: Site location plan**

- 2.1 The application site forms part of the main car park in West Wickham District Centre. The car park is located on the southern side of the High Street and is accessed via a narrow road leading between 85 and 87 High Street. The roadway is straight for the depth of the adjacent buildings before angling left at the car park approach. The access road is approx. 3m wide and a 1m wide (approx.) pedestrian pavement runs along its western side.



**Figure 2 – Access from High Street**

- 2.2 Vehicles exit the car park from a separate roadway which runs between 107 and 109 High Street and is approx. 3.4m wide with a narrow pavement along its western side, which is approx. 0.8m wide.
- 2.3 The car park is bounded to the west by the rear gardens of dwellings fronting Grosvenor Road, to the south by residential dwellings fronting Springfield Gardens and to the east by the parking/manoeuvring space associated with Knotley Way. Between the car park and the eastern and southern (part) boundaries of the site of the site is an area TPO (TPO 253A, 09/01/1990).
- 2.4 To the north of the car park are the rear parking, access and outside areas associated with the properties fronting the High Street.
- 2.5 The specific application site is referred to as comprising 14 no. car parking spaces which are arranged perpendicular to and approx. 1.65m from the western boundary of the car park with the rear gardens of dwellings fronting Grosvenor Road and Springfield Gardens.



**Figure 3 – Car park layout (proposed)**

2.6 However, it was observed on site that the layout of the existing parking bays does not precisely tally with that indicated on the submitted drawings – with the information within the application not reflecting the current layout which includes new disabled bays positioned in the western row of parking spaces. The submitted block plan indicates with a red line that the development would consume 14 spaces, with 4 no. spaces retained between the car wash site and the yellow box markings. On site the spaces between the south western corner of the car park and the barrier/box markings were counted as comprising 12 regular sized bays, with 4 disabled bays.



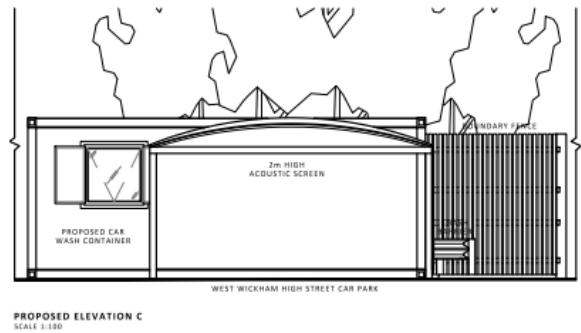
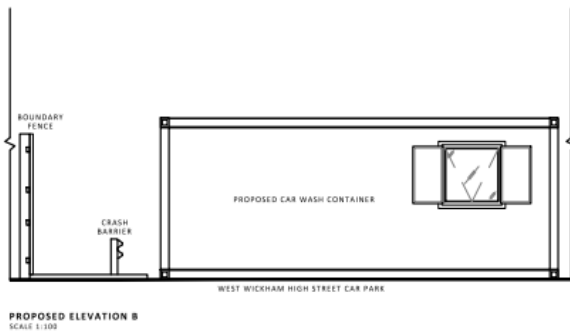
**Figures 4 and 5 – South west corner and western boundaries**



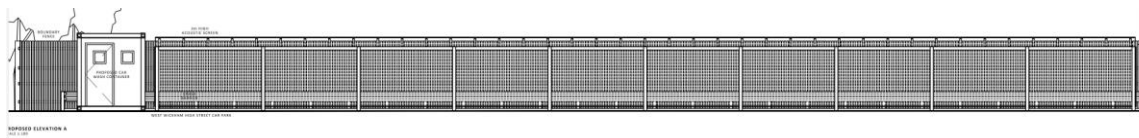
**Figure 6 – Western boundary with rear of Grosvenor Road dwellings**

### 3. PROPOSAL

- 3.1 It is proposed to change the use of an area of public car parking spaces in the southern/western part of the car park to allow for the operation of a commercial car wash service.
- 3.2 A partially enclosed wash bay structure would be installed in conjunction with the car wash bays, along with a 2m high acoustic fence along part of the western and southern boundaries adjacent to the car wash operation. The screening structure is indicated on the submitted drawings as being 2m high with a curved roof above (max. approx. 2.35m high).



**Figures 7 and 8 – northern and southern elevations**



**Figure 9 - western elevation (towards rear of Grosvenor Road)**





**Figure 10 – example image of enclosure type (source – Noise Impact Assessment)**

- 3.3 A pre-fabricated structure/container would be positioned in the south western corner of the site.
- 3.4 The application has been submitted with the following supporting documents:
- Technical Note – Review of Car Park Occupancy Survey project no. 23274 dated 5th September 2023
  - Noise Impact Assessment – Car Wash project no. 2322049 dated 8th September 2023
  - Surface Water Drainage Strategy (September 2023)
- 3.5 The application form refers to the proposal being operated by 3 no. full-time equivalent employees with the car wash operating between 09.00 and 18.00 Monday – Saturday and 09.00 – 16.00 on Sundays and Bank Holidays.

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

- 4.1 Under reference 22/03216/FULL2 planning permission was refused for development described “Change of use of 14 car parking spaces (bays) in a car park to be used as space for a car wash including a container for storage and staff office.”
- 4.2 Permission was refused on the grounds:
1. Insufficient information has been provided regarding the noise and other environmental impacts of the proposal and any potential mitigation measures. In the absence of this information, the proposal has a detrimental impact on the residential amenities of neighbouring residential properties, and is thereby contrary to Policies 37 and 119 of the Bromley Local Plan.
  2. Insufficient information has been provided to establish the impact of the loss of car parking spaces for West Wickham Town Centre. It could result in an increase in

demand for on-street parking and potential safety issues for pedestrians and other road users, thereby being contrary to Policies 30 and 32 of the Bromley Local Plan.

- 4.3 Under reference 19/02370/PLUD an application for a lawful development certificate for the use of 12 car parking bays as hand car wash and stationing of container in relation to car wash operation was refused on the ground:

“The proposal is considered to be development requiring planning permission as defined under Section 55, Part III of the Town and Country Planning Act 1990.”

## **5. CONSULTATION SUMMARY**

### **A) Statutory**

- Highways

The car parking survey was conducted in August – may not be representative of typical car park usage.

Limited detail on the impact of the car wash on congestion at the access to the car park.

Lack of detail on the impact on the recently marked disabled bays.

Limited information regarding surface water drainage and pedestrian/vehicular safety (should ice form during cold weather etc.).

- Drainage

It is unacceptable to rely on existing drainage at the site. The change of use to a car wash will increase discharge volume into the public sewer. A tank would need to be installed to restrict the flow of water entering the public sewer. Pre-commencement drainage condition recommended should planning permission be granted.

### **B) Local Groups**

West Wickham Residents' Association

- The High Street is a red route, with limited on-street parking for shoppers, business owners and employees
- Development of the Station Road/Croft Avenue car park has removed more than 60 spaces from the total of car park spaces in the locality – the closure of the other car park was justified in part by the remaining car park capacity locally
- While at times there may be free parking bays within the application car park, at times the occupancy is very high and the loss of 14 spaces will impact on residents

- The proposal will result in loss of disabled parking bays from the west end of the car park (sited close to the exit) or require them to be re-provided in a less accessible/convenient position
- Lack of information on how the run-off will impact on the environment
- Noise pollution daily and throughout the year will adversely affect residential enjoyment of the neighbouring properties, impacting on quality of life
- The District Centre requires the retention of adequate car parking in order to thrive and continue to be vibrant, protecting the valuable businesses/services provided and remaining accessible to disabled visitors

### **C) Local comments**

Objection

Highways and parking (addressed at 7.2)

- Loss of parking space when there is insufficient car parking in West Wickham
- The access to the car park is very narrow and while local residents know to take care, increased vehicle use will increase risk and impact on the safety of car park users and visitors
- The car park in Station Road West Wickham has been lost to development and the High Street is subject to red route restrictions which results in this car park being essential to support the local centre
- Would be preferable for the spaces to be converted to electric vehicle charging points as these will be needed in the near future
- The car park is always busy, particularly at weekends
- The car parking survey was undertaken during August and a period of fine weather when many people would have been on holiday/would have visited the centre on foot. Survey did not include weekend use. Survey should be undertaken at a time that reflects the average use of the car park
- Survey does not include additional cars within the parking area waiting for car wash service
- Lack of mother and baby car parking spaces/spaces for larger vehicles in the local area
- Often have to park in surrounding streets when the car park is full
- Will cause congestion on the access to the car park
- Impact on elderly car-park users and those with mobility issues – if unable to park within the car park which is already very busy
- Loss of disabled bays which were only recently been marked – if reprovisioned elsewhere within the car park, will lead to further loss of car parking spaces
- Water and grit from the car washing will make the remaining disabled bays slippery/icy
- Container will overhang the parking bays



### Impact on neighbouring amenity (addressed at 7.3)

- Type of car wash is unregulated and noisy – use of pressure washers and vacuum cleaners would contribute to significant noise pollution
- Car washes have a lot of associated noise, like vacuums, shouting, car horns, banging of mats and loud music from clients – that won't be contained in an open-ended structure and should not be in a residential area
- Existing noise heard in neighbouring gardens is negligible – intermittent car doors shutting and cars starting only, and payment for parking by app has reduced the number of instances of car doors opening/shutting.
- Speed in car park is 5MPH, and in High Street is 20MPH – neither of which results in significant background noise, and Grosvenor Road to the rear is one way only – limited traffic noise as a background
- Possible overspray
- Impact on nearby eating facilities associated with premises opposite the carpark
- Sunday operation would impact on amenity
- Odours associated with the use of chemicals
- The noise, water run-off, increased traffic movement and movement of people will be disruptive to residents, business owners and their customers
- Impact on home working in nearby dwellings and amenity within gardens
- Concern that the information provided by the applicant does not correlate with the information within the acoustic assessment (applicant refers to vacuums with 73-79 dB output, then the acoustic assessment refers to 67dB)
- Will need a generator to operate the equipment – or else how will the equipment be powered (NB other sites have a generator)
- The report is inaccurate as it states that the noise levels from car wash activity was measured in August 2023, when there is no existing car wash in the car park
- Report refers to assessment of noise levels in Station Road – this is half a mile from the application site.
- The report equates the noise from the car wash to the noise associated with the existing car park – which is inaccurate since in car washes all doors are opened and closed etc.
- Limited acoustic fencing proposed
- Impractical for all jet washing and hoovering to take place inside the acoustic bays due to orientation of bays, and to reach front and rear of the car, and inside operatives will encroach into the manoeuvring space of the regular, retained bays, or will conflict with the confines of the acoustic structure
- Parked cars don't idle
- Concerns as to the exact positioning of the proposed 2m acoustic fencing – in front of the crash barrier it will decrease the length of the available space in the bay again making using machinery inside of the wash bays to mitigate noise even more impossible. If behind this will be very close to residents' private fencing making maintenance impossible.
- Impact on access from neighbouring rear gates into the car park
- Reference to the impacts arising from the unauthorised car wash at Beckenham Spa and current application. Noise abatement order issued and ignored, and lighting installed before application determined

#### Visual impact (addressed at 7.4)

- The proposed container/car wash would be an eyesore – will be visible from neighbouring gardens, particularly since the car park is on higher ground than the gardens
- Will encourage fly tipping
- Inappropriate place for a car wash

#### Other matters (addressed at 7.5)

- Concern over employment conditions for workers and the operation of the car wash
- Environmental impact of an additional car wash facility in terms of water usage etc. along with detergent and chemical run off into the local ecological environment – pollution and harm to wildlife
- No public benefit other than to the operators
- Lack of need for another car wash as there are at least three at garages within 1 mile of the High Street
- Impact on business within the High Street and upon Wickham Hall community centre
- Impact on property values
- The applicant controls the station carpark – that should be used instead
- Will lead to application for lighting to allow for operation in winter months

#### Support

- A car wash is needed and there is always plenty of room in the car park

## **6. POLICIES AND GUIDANCE**

### **National Planning Policy Framework (NPPF) December 2023**

#### **NPPG**

#### **The London Plan (LP) 2021**

- GG5 Growing a good economy
- D3 Optimising site capacity through the design-led approach
- D13 Agent of change
- D14 Noise
- SI1 Improving air quality
- SI12 Flood risk management
- SI13 Sustainable drainage
- T6 Car parking

## **Bromley Local Plan (BLP) 2019**

30 Parking  
32 Road Safety  
37 General Design of Development  
94 District Centres  
116 Sustainable Urban Drainage  
119 Noise Pollution  
123 Sustainable Design and Construction

## **Supplementary Guidance**

Mayor's Ambient Noise Strategy  
Urban Design Supplementary Planning Document (Bromley 2023)

## **7. ASSESSMENT**

### **7.1 Resubmission**

7.1.1 The current application differs from that refused under reference 22/03216/FULL2 in the following key respects:

- Submission of parking stress survey, drainage documentation and a noise impact assessment
- Drawings of proposed container, and size and siting provided, and showing installation of 2m high acoustic screen between the crash barrier and the affected parking bays, with curved canopy

7.1.2 In the assessment of the previous scheme it was considered that in view of the site's location immediately adjacent to residential rear gardens in Grosvenor Road and Springfield Gardens, the location of the proposed facility was unacceptable in principle.

7.1.3 The current submission seeks to address specifically the grounds for refusal of planning permission which referred to:

- Noise and other environmental impacts
- Impact of the loss of car parking spaces and on highways safety (including pedestrian safety)

### **7.2 Highways and Drainage Impact - Unacceptable**

7.2.1 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.

- 7.2.2 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.
- 7.2.3 Policy 116 of the Bromley Local Plan relates to Sustainable Urban Drainage Systems (SUDS).
- 7.2.4 Comments from the Highways officer have been received and objections have been raised. While a parking survey has been provided, it was undertaken at a time that may not be representative of the typical day to day usage of the car park. Furthermore, it is noted that limited information has been provided regarding highways drainage and the potential impact of water associated with the intended use on pedestrian and vehicular safety, as well as with regards to the impact the proposal would have in terms of the loss of existing disabled parking bays at the site.
- 7.2.5 It is noted that the access and egress to and from the car park is single car width only, and pedestrian and vehicular access comes into close proximity with each other, resulting in a potential conflict between the two, which could be exacerbated if the comings-and-goings associated with the proposed use of the site are increased. Limited information has been provided on this, and while the proposal would reduce the overall quantum of parking provision within the car park, it would introduce a more intensive use of those re-purposed spaces, with potentially increased turnover/frequency of use of those car wash spaces.
- 7.2.6 It was noted on site that the submission does not accurately show the layout of the car park as existing, in terms of the potential number of spaces impacted and with regards to the 4 no. disabled parking spaces. It is unclear also, in terms of the drawings and example of acoustic enclosure included in the Noise Impact Assessment, how practicable the manoeuvring of vehicles into and out of the bays to allow operative access while maintaining the passage of non-car wash vehicles along/adjacent to the bay would be.
- 7.2.7 The application has been submitted with a Surface Water Drainage Strategy which states that the existing car park is surface is 100% impermeable and hard-standing areas would not be increased as a consequence of the development – stating “therefore, no attenuation of surface water runoff will be required for the proposed development.” It sets out assumptions regarding the water environment impact of the proposal, stating that it is assumed that runoff from the car park also discharges into the foul sewer network, existing gullies and manholes are assumed to have sumps to capture sediment and other pollutants, it is likely that there is an oil interceptor installed near the site’s drainage outfall and that the car wash will use water-based cleaning products.
- 7.2.8 The drainage officer has expressed concern at the intended use of the existing drainage provision at the site to address run-off, stating that a tank would need to be installed to allow for flow-restriction, noting that the car wash will increase discharge

volume into the public sewer. While these concerns are noted, the drainage officer has recommended that should planning permission be granted for the proposal, a pre-commencement drainage condition may be applied in order to satisfy the above points. The reasons for refusal in the determination of the previous application did not specifically refer to the drainage impact of the development and comments from the drainage officer taken into account in the assessment of that application referred solely to the need for an oil interceptor to be installed at the last outfall. However, that application was not supported by a site-specific Surface Water Drainage Strategy – i.e. more detail has been provided regarding the intentions of the applicant in relation to the management of drainage at the site arising from the proposed development.

7.2.9 The use of a suitably worded pre-commencement planning condition, should planning permission be granted, would provide the opportunity for greater detail to be provided in relation to the drainage matters raised within the Surface Water Drainage Strategy and by the Council's drainage officer. In note of the planning history of the site and the potential that technical drainage matters could be appropriately dealt with by way of condition it is not considered that the refusal of planning permission on this specific concern would be warranted in this instance.

7.2.10 Taking the above into account, it is considered that the proposal would have a detrimental impact on conditions of safety within the car park/accesses, as well as resulting in the unacceptable loss of parking spaces including designated accessible/disabled parking bays. While the application has been supported by information including a parking stress survey, the information provided is not sufficient to address the concerns expressed above with regards to the potential highways impacts of the proposal.

7.2.11 The concerns raised regarding the proposal including with regards to the accuracy of the submission in relation to the disabled bays/number of parking bays affected by the proposal were communicated to the applicant's agent, who requested that the application be determined as submitted.

### 7.3 Impact on residential amenity - Unacceptable

7.3.1 Policy 37 of the Local Plan seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties including general noise and disturbance.

7.3.2 Policy 119 of the Bromley Local Plan relates to noise, and states that proposed developments likely to generate noise will require a noise assessment to identify issues and appropriate mitigation measures.

7.3.3 The application has been submitted with a Noise Impact Assessment (dated 8th September 2023). This sets out 2 proposed mitigations that are intended to address the potential impact associated with noise:

- Installation of a partly enclosed structure associated with the proposed car wash bays
- Installation of 2m high acoustic fencing along part of the southern and western boundaries of the site (relative to neighbouring residential gardens).

7.3.4 The neighbouring objections are noted. The site is located within an area with a mixed character, and while the site itself lies behind West Wickham High Street with commercial use, the car park is also surrounded by residential properties along Grosvenor Road and Springfield Gardens.

7.3.5 The submitted Noise Impact Assessment at Table 5 makes an initial assessment that identifies a significant adverse impact. It also refers at paragraph 5.2 to on-site measurements having been taken to assess the noise associated with car washing activity, and in Table 5 to the application being retrospective although this application is not retrospective in nature and no existing car washing service is provided at the site. Table 5 also refers to a previous application reference 22/03224/FULL2 - that application reference refers to a separate site at the Car Park, Station Road, Bromley, rather than to this application site.

7.3.6 The Environmental Health (Pollution) officer has been consulted and raises objections to the proposal, stating that the nature of the use on the basis of the submission, the noise predictions and lack of detail on mitigation performance, does not address the previous concerns. In summary, the following key issues are raised:

- BS4142 assessment bases the significance of the noise impacts upon exceedance of existing background noise levels. This is in accordance with the correct methodology, however the assessment was only undertaken on a single day, and the time of day when measurements were taken is not provided. There is therefore significant uncertainty as to whether this reading is representative.
- L90 background levels in back gardens are likely to be significantly lower than those measured adjacent to the car park (considering a reduction is required for fence and distance from the carpark). I would conservatively estimate background levels in the garden areas to be at least 5 dB(A) lower than the level quoted in the report.
- The maximum car wash usage (which is assumed in the report at being 75%) is also queried – a worse case consideration of summer weekend use, when often such facilities have lengthy queues and are in constant use is considered more appropriate in this instance, particularly in note of these busy periods being likely to coincide with periods when neighbouring residents may wish to use their garden spaces.
- Jet washing is not a continuous noise, being dependent on a variety of factors – including panel thickness, manner of mounting, type of material and how dirty the vehicle is, as well as the proximity of the pressure jet to the panel and the power of the jet washer in operation. This leads to significant uncertainty in this element of the prediction methodology provided with the application – (EHO comments assume a 2dB(A) uncertainty may exist).
- The assertion at paragraph 4.1 of the Noise Impact Assessment that “Noise from cars manoeuvring in the car park, doors being closed and voices would be no different in level or character to the existing use of the car park and therefore are considered negligible” is noted. However, the report ignores the fact that these parking bays will be more intensively used than previously. The existing arrangement means that each bay is only likely to see relatively few parking movements every few



hours, where the proposed cleaning and vacuuming operations are likely to involve each door and the boot being opened at least once.

- The provision of a lightweight enclosure by way of mitigation is noted, but the acoustic performance of the structure has not been provided and the example provided in the assessment will not provide the required level of sound attenuation. To provide the necessary reduction of 20-30 dB(A) the enclosure would need to be a substantial, fully enclosed structure, for which a further noise assessment would be required.

7.3.7 The site is located very close to the rear boundary fenceline separating the car park from the neighbouring gardens. The nature of the use which will be reliant on a swift turnaround of vehicles using the facility is considered likely to result in an increased disturbance to neighbouring residents, associated with the operatives working at the site, idling vehicles, car radios, doors slamming etc. than would be associated with the basic existing operation of parking and leaving to use the shops/local facilities.



**Figure 11 – Position of parking bays relative to properties fronting Grosvenor Road**

7.3.8 While the site is located in an area of mixed character, to some degree the open car park provides a transition space between the busier High Street and the residential properties that surround the other three “sides” of the space. The land projects into the residential enclave to the rear of the High Street, and the proposed facility would be provided at the very far corner of the site, away from the commercial activities of the High Street and in close proximity to the neighbouring residential sites.

7.3.9 Taking into account the above assessment, including the comments from the Environmental Health team and neighbouring residents it is not considered that the proposal as set out in the application adequately addresses the previous ground for refusal relating to noise and disturbance arising from the proposed commercial car wash use.

#### 7.4 Impact on visual amenity - Acceptable

7.4.1 It is noted that while the previous application for planning permission was refused, this was on the basis of the impact of the proposal on the residential amenities of the area and with regards to the highways/parking impacts of the development. The

change of use of the car parking spaces and installation of a kiosk/staff quarters was not considered unacceptable in terms of the impact of this on the visual amenities of the area.

- 7.4.2 This application includes the installation of a partly enclosed wash bay structure which would extend for the full depth and length of the parking bays proposed to be used for the car wash. It would be 2m height, topped by a curved roof which would slope down towards the 2m high acoustic fence provided between the car park and the gardens of dwellings fronting Grosvenor Road.
- 7.4.3 While of somewhat utilitarian design, it is a reasonably lightweight structure that would not be significantly high relative to boundary enclosures/screening, and would generally be viewed in the context of the public car park, height restriction barriers and the quite varied commercial appearance of the rear of the High Street properties.
- 7.4.4 Taking this into account, it is not on balance considered that the proposal would result in a significantly adverse impact on the visual amenities and character of the area.

## 7.5 Other Matters

- 7.5.1 Representations have referred to there being no need for an additional car wash facility and the impact of the proposal on property values. With regards to the latter point, this is not a material planning consideration. With regards to the need for the development, the commercial benefit to the operators and there being existing car wash facilities locally, there is no requirement in planning policy to demonstrate need for the facility and it is a generally recognised principle that it is not the planning system's role to prevent competition.
- 7.5.2 Comments have also referred to the impact of the proposal's drainage on the environment. The Council's drainage officer was consulted on the application and confirmed that the change of use to a car wash would increase the discharge volume into the public foul sewer, if the existing drainage provisions are utilised. A tank would need to be installed to restrict the flow entering the public sewer. Should planning permission be granted a pre-commencement drainage condition would be necessary to address these matters.

## **8. CONCLUSION**

- 8.1 It is considered that the proposal fails to have sufficient regard to the impact of the proposal on the safety of pedestrians and vehicles within the site, the impact of the proposal with regards to loss of car parking (including disabled bays) along with the impact of the proposal on vehicular congestion/manoeuvring within the site and access.
- 8.2 On the basis of the information provided and the scope of the proposal it is considered that the proposal would lead to an unacceptable impact on the residential amenities of neighbouring residents, giving rise to increased noise and general disturbance that is not characteristic of the immediate location of the car wash relative

to the neighbouring residential gardens. It is not considered that the submitted details satisfactorily address the previous ground for refusal in this respect, or that the mitigation measures indicated would successfully limit the impact of the proposal to an adequate extent.

## **RECOMMENDATION: PERMISSION BE REFUSED**

**On the following grounds:**

- 1. The proposal would have a detrimental impact on the residential amenities of the area, resulting in unacceptable noise and general disturbance, and the submitted information and mitigation measures are considered inadequate to address and mitigate the impact associated with the use on neighbouring residential properties, thereby contrary to Policies 37 and 119 of the Bromley Local Plan.**
- 2. Insufficient information has been provided to demonstrate that the proposal would not have a detrimental impact on conditions of safety and the flow of traffic within and adjacent to the car park, as well as with regards to the loss of on-site car parking (including disabled bays), in the absence of which the proposal would give rise to an increased demand for on-street parking and potential safety issues for pedestrians and other road users, thereby being contrary to Policies 30 and 32 of the Bromley Local Plan.**