

Committee Date	13.06.2024	
Address	Holwood House Westerham Road Keston BR2 6HB	
Application Number	24/00109/FULL1	Officer - Stephanie Gardiner
Ward	Bromley Common And Holwood	
Proposal	The extension of the existing garage at ground level, with basement level garage and games/leisure room	
Applicant	Agent	
Peter Waddell	Mr John Collins	
Holwood House Westerham Road BR2 6HB United Kingdom	Eclipse House Eclipse Park Sittingbourne Road Maidstone ME14 3EN	
Reason for referral to committee	Councillor call in	
	Call-In	Cllr Jeffreys: call-in if officers are minded to refuse the application.

RECOMMENDATION	REFUSE
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<p>KEY DESIGNATIONS</p> <p>Areas of Archeological Significance</p> <p>Ancient Monuments</p> <p>Article 4 Direction</p> <p>Biggin Hill Noise Contours</p> <p>Biggin Hill Safeguarding Area</p> <p>Green Belt</p> <p>Historic Parks and Gardens</p> <p>Historic Landfill Sites</p> <p>London City Airport Safeguarding</p> <p>Statutory Listed Buffer</p> <p>London Loop</p> <p>Sites of Interest for Nat. Conservation</p>

Smoke Control SCA 14
Statutory Listed Building

Representation summary	The application was advertised by way of a site notice and press advert. Letters were sent to neighbouring residents/properties on 5 th February 2024.
Total number of responses	2
Number in support	1
Number of objections	1

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed extension would result in a 25.3% increase in floorspace. It would therefore result in a disproportionate addition that would amount to inappropriate development in Green Belt. Furthermore, it would not preserve the openness of the Green Belt, which would conflict with the purposes of including land within it contrary to Policies 49 and 51 of the Bromley Local Plan, Policy G2 of the London Plan and Chapter 13 of the NPPF.

2. LOCATION

2.1 The site is located to the south of Keston Village and Westerham Road and set within approximately 50 acres of parkland and gardens. Holwood Mansion is a grade I listed dwelling, and the site is also a Grade II registered historic park. The Holwood Camp Scheduled Monument is also located to the north of the building. The site is also designated as an area of Archaeological priority and Green Belt. Holwood Mansion is located at the top of Holwood Hill at an elevated point, with the land sloping downwards on three sides and there are views of the gardens and hills to the south. To the north there is a tennis court and walled garden.

2.2. The Historic England list description for Holwood Manson is as follows:

"William Pitt the younger had a house here on this site. This was demolished and rebuilt by Decimus Burton for John Ward in 1825. Lord Cranworth, who was Lord Chancellor from 1852-8 and from 1865-6 also lived here. 2 storeys. 13 windows. White brick on a stone base with stone stringcourse cornice and parapet. The north-west or entrance front has a central projecting portion of 3 windows with a recessed porch in this having 2 fluted stone Greek Doric columns, a window on each side of the porch flanked by pilasters and a stone entablature with pediment over. At each end is a one-storey pavilion of 3 round-headed windows with a pediment over. At the north-east end is a service wing of 9 windows. The south-east or garden front has a central bow with 4 free-standing fluted Ionic columns and 2 Doric pilasters standing on a plinth of 6 semi-circular steps and rising the whole height of the house with a stone entablature above. The 3 window bays at each end are recessed. Their ground floor has 2 fluted

Doric columns and 2 pilasters. To the south-east of the house is a very fine cedar tree at least as old as Pitt's time.

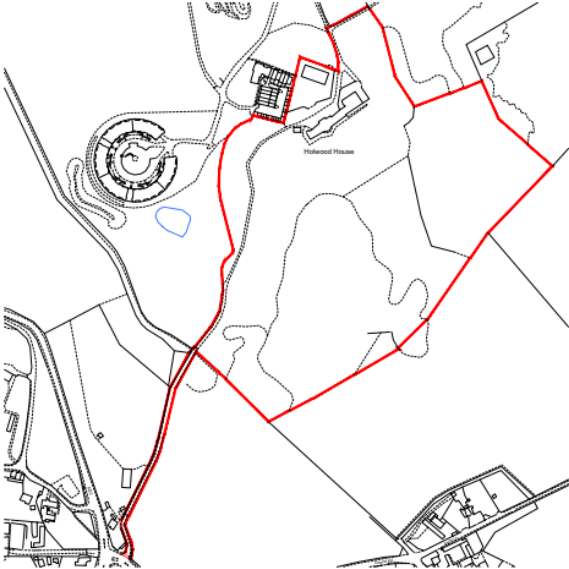


Fig 1: Site Location Plan

3. PROPOSAL

3.1 Planning permission is sought for the extension of the existing garage at ground level, with basement level garage and games/leisure room. The extension above ground would measure 17.5m in width and 18.5m in depth.

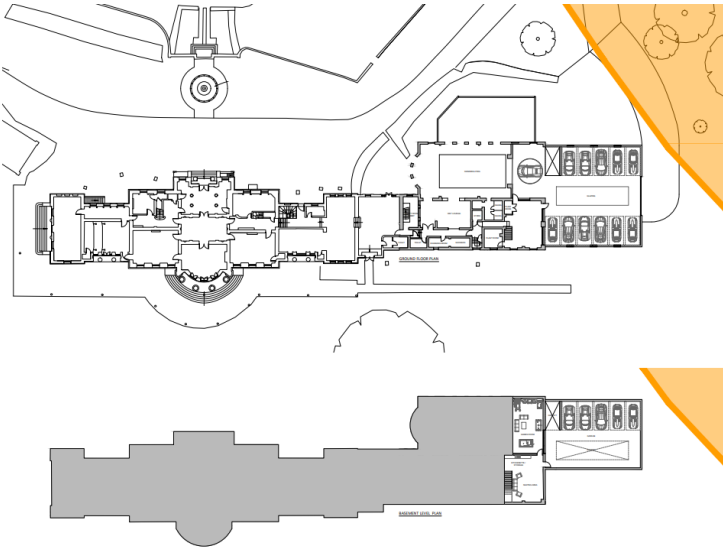


Fig 2: Proposed Plans

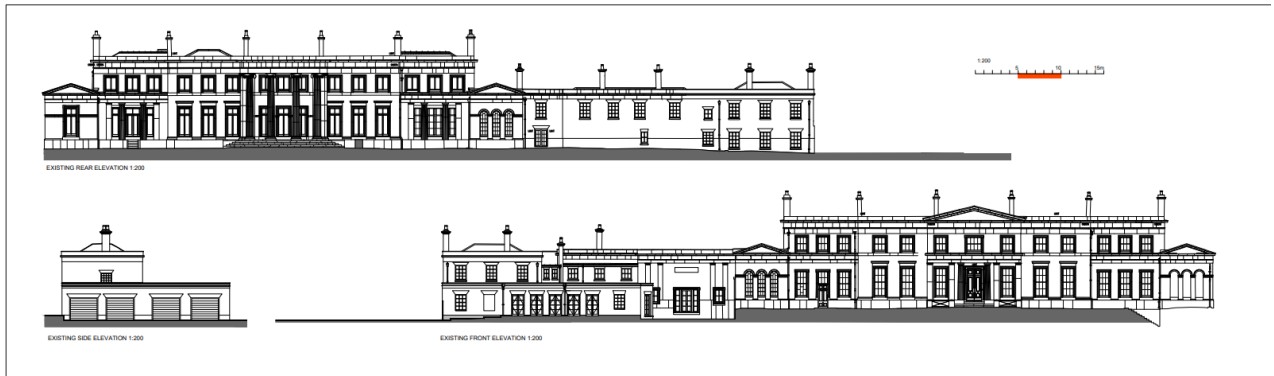


Fig 3: Existing Elevations

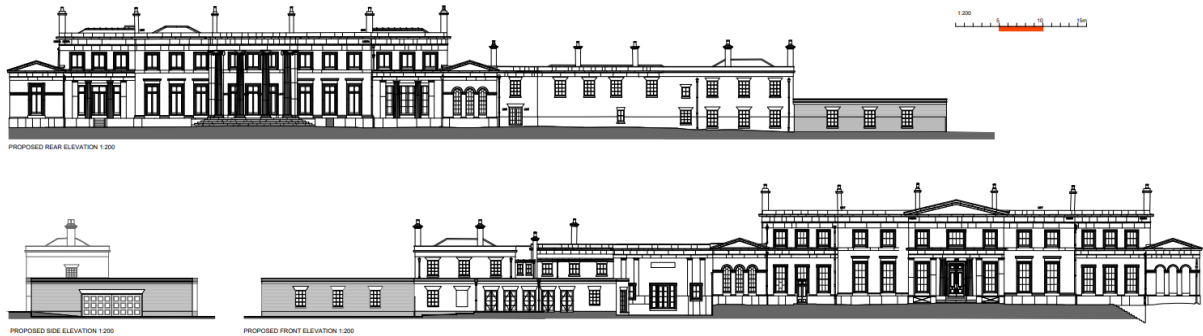


Fig 4 : Proposed Elevations

4. RELEVANT PLANNING HISTORY

The relevant planning history relating to the application site is summarised as follows:

There is a long planning history for this site however only the following are considered relevant:

99/00928/FULL2 - Change of use of mansion and part of grounds from offices (Class B1) to dwelling with domestic curtilage - Approved - 15.06.2001

99/01478/LBC - Demolition of Perry Block stable yard building and the stable yard/garden wall and structures adjacent to the north-eastern corner of Holwood House (Renewal of LISTED BUILDING CONSENT 93.0279) - 03.08.1999

99/03174/FULL1 - Partial demolition, elevational alterations and hard landscaping - Permission - 12.02.2001

99/03175/LBC - Partial demolition and elevational and internal alterations to facilitate conversion to dwelling with hard landscaping LISTED BUILDING CONSENT - 01.02.2001

05/00172/FULL6 - Single storey extension comprising swimming pool and garages - Permission - 10.03.2005

05/00260/LBC - Single storey extension comprising swimming pool and garages and internal alterations LISTED BUILDING CONSENT - 10.03.2005

05/01951/FULL1 - 2 entrance wall features at access to Westerham Road (1m high) - Approved - 18.08.2005

17/05118/FULL6 - Regularisation of works to renovated and restored Holwood House and part of the swimming pool/garage extension works together with repairs/rebuilding of roof structure - Permission - 21.05.2018

18/00920/LBC - Regularisation of works to renovated and restored Holwood House and part of the swimming pool/garage extension works together with repairs/rebuilding of roof structure LISTED BUILDING CONSENT - 21.05.2018

18/03151/FULL6 - Application for the construction of deer proof fencing, security fencing, railings and new gates - Approved

18/05371/FULL1 - Erection of a fountain in the grounds of Holwood House, Keston - Approved

18/05372/LBC - Erection of a fountain in the grounds of Holwood House, Keston - Approved

18/05386/FULL1 - Extension of the existing garage to provide further garaging of vehicles and associated external works. Permission

18/05383/LBC - Extension of the existing garage to provide further garaging of vehicles and associated external works. Consent

19/01099/FULL6 - The construction of a garden/parkland maintenance building, with associated access works at Holwood House, Keston. Permitted

23/00950/FULL1 - Side extension of existing garage at ground level, with basement level garage including turntable and games/leisure room. Refused for the following reason:

1. The proposal would result in a disproportionate addition that would amount to inappropriate development in Green Belt. Furthermore, it would not preserve the openness of the Green Belt and would conflict with the purposes of including land within it contrary to Policies 49 and 51 of the Bromley Local Plan, Policy G2 of the London Plan and Chapter 13 of the NPPF.

The above application is currently at appeal under ref: APP/G5180/D/23/3334959 and is still being considered.

23/00951/LBC - Listed Building Consent for Side extension of existing garage at ground level, with basement level garage including turntable and games/leisure room. Granted.

23/04011/FULL1 - The extension of the existing garage with related works at Holwood House Keston Kent. Permission

23/04012/LBC - The extension of the existing garage with related works at Holwood House Keston Kent. Granted.

24/00110/LBC - Listed Building Consent for the extension of the existing garage at ground level, with basement level garage and games/leisure room. Pending

Please note that a full list of the planning history can be found on the Council's website.

5. CONSULTATION SUMMARY

A) Statutory

Conservation Officer: No objections

Historic England – The proposals are very similar to the planning application 23/04012/LBC (to be determined) albeit now includes a basement extension beneath the new extension. This variation does not raise any additional heritage concerns. With regards to the design of the proposed extension in relation to Holwood House, we remain content it would be closely matched to the host building, so would appear part of the seamless whole, and would be deferential by stepping in from the façade line. The success of the extension being able to blend in and avoid adversely impacting Holwood House is however highly dependent on the quality of the new brickwork, render, stone detailing, and windows, as well as how well they are laid out. To safeguard this, should your council be minded to grant consent, we recommend samples of these materials should be approved by your Conservation Officer, which could be secured through condition.

The proposed extension does not encroach on the defined and protected area of the scheduled monument of Holwood Camp (monument number LO 101), however the proposed road surface to the extended garage and any landscaping would extend into the monument boundary. No details of these works nor any assessment of how the monument would be impacted by these works has been provided, which has been one of our principal concerns with the various iterations of this scheme. Unless the applicant amends the scheme to remove all parts from the Monument's boundary, an application for Scheduled Monument Consent will be needed. Falling within the boundary of the monument raises the potential the scheme could cause harm and therefore in accordance with Paragraph 201 of the NPPF the applicants will need to demonstrate the harm has been avoided or minimised as far as possible. We remain

unconvinced this has been suitably provided. We therefore recommend the applicant should explain why the access road needs to encroach on the monument, what landscaping is proposed on the monument, what the impact would be and what mitigating measures have been taken.

Even if the proposals are entirely removed from the monument's boundary the proposals still get very close to it. It's important that the works do not encroach on the monument, as it's very easy for construction to expand once on site. We recommend your council attaches conditions to any granting of planning permission to restrict the zone of the work. We recommend the applicant is requested to provide a method statement detailing how they will create an exclusion zone or protect the monument otherwise if they plan to drive over.

Paragraph 7.1.5 of the applicant's *Design and Access Statement* refers to additional landscape improvements and planting to soften views of the new extension and improve the setting and amenity. No details of this have been provided. We would strongly encourage any new planting or landscaping to be characteristics of a Repton designed landscape and informed by the late C17th/early C18th techniques for screening and filtering views. We would encourage this information is made available to your authority, which could be controlled via condition, should you be minded to grant consent. Any landscaping within the boundary of the monument would also need to be included in an SMC application.

Recommendation

Historic England has concerns regarding the applications on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 201 of the NPPF.

In determining these applications, you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your Authority should take these representations in account and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

The Greater London Archaeological Advisory Service (GLAAS) - The planning application is in an Archaeological Priority Area. The Archaeological context of the application site is in respect of the proximity of the largest Iron Age hillfort in Greater London and the possible extra mural settlement to its south. The archaeology is of national significance as reflected by its status as a Scheduled Ancient Monument.

Recommendation - The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. Recommend a planning condition requiring a written scheme of investigation (WSI) to be submitted to and approved in writing prior to commencement of development.

This pre-commencement condition is necessary to safeguard the archaeological interest of the site. Approval of the WSI before works being on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternative suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with the NPPF Para 205.

It is envisaged that the archaeological fieldwork would comprise an Archaeological Strip-Map-Record. It is that all areas of ground disturbance associated with the development, both permanent and temporary, are subject to an archaeological strip-map-record program. Archaeological s-m-r is a structured investigation with defined research objectives which normally take place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-site s-m-r' assessment will be prepared followed by an appropriate level of further analysis, publication and archiving.

Archaeological Society: No comments received

Garden Trust - No comments received

The Georgian Trust - No comments received

Council for British Archaeology - No comments received

B) Adjoining Occupiers (addressed in Para. 7 - 8)

Nearby owners/occupiers were notified of the application and the following representations were received, which can be summarised as follows:

Objection

- Object if they use the entrance from Westerham Road to have deliveries and removal of debris from the house/site during renovation or construction.
- No objection if they use the private entrance, they have coming in from Downe Road exclusively.

Support

- For older buildings to survive they must support living in the modern context
- The storage of motor vehicles is a factor of modern life. If Holwood House is to continue to enjoy occupancy and maintenance it must be upgraded and maintained to support modern living
- Holwood House is located in a rural area and can only be seen from the private grounds or from other properties on Holwood Estate.
- Comment from neighbour on Holwood Estate confirming they cannot see the location of the proposed extension from their property nor they believe can their neighbours.
- Cannot therefore object on the ground as it being unsightly.

6. PLANNING CONSIDERATIONS

6.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

The National Planning Policy Framework was updated in 2023, and is a material consideration.

The development plan for Bromley comprises the Bromley Local Plan (Jan 2019) and the London Plan (March 2021). The NPPF does not change the legal status of the development plan.

The application falls to be determined in accordance with the following policies:

The London Plan (2016):

HC1 Heritage and Conservation and growth
D10 Basement Development
G2 Green Belt
G4 Open Space
T5 Cycle Parking
T6 Car Parking

Bromley Local Plan (2019):

Policy 6 Residential Extensions
Policy 37 General Design of Development
Policy 38 Statutory Listed Buildings
Policy 45 Historic Parks and Gardens
Policy 46 Scheduled Monuments and Archaeology
Policy 49 The Green Belt
Policy 51 Dwellings in the Green Belt or on Metropolitan Open Land
Policy 73 Development and Trees

Other Guidance:

Urban Design Guidance (Bromley 2023)

7. CONSIDERATION

7.1 Resubmission

7.1.1 The application follows several previous applications which have been set out in the planning history section of this report. The current proposal is a resubmission of Planning ref: 23/00950/FULL1, which was refused. To address previous objections, the applicant has reduced the size of the basement and removed the bowling alley. The percentage increase in built development has been reduced from 30.6% under the refused application to now 25.3%.

7.2 Heritage Impact – Acceptable

7.2.1 The NPPF sets out in section 16 the tests for considering the impact of a development proposal upon designated and non-designated heritage assets. The test is whether the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset and whether it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits. A range of criteria apply.

7.2.2 Paragraph 208 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should

be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. The effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- 7.2.3 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on a local planning authority, in considering development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting, or any features of architectural or historic interest it possesses.
- 7.2.4 The host building is Grade I Listed which is set within c.50 acres of park land and gardens. It is sited towards the top of Holwood Hill in an elevated position, looking out towards gardens, hills, and trees to the south. To the north of the house there is a tennis court, walled garden, pavilion and Holwood Estate development. There are numerous trees surrounding the building.
- 7.2.5 Policy 38 of the BLP states that applications for development involving a listed building or its setting, or for a change of use of a listed building, will be permitted provided that the character, appearance and special interest of the listed building are preserved and there is no harm to its setting. These policies are supported by London Plan Policy HC1.
- 7.2.6 The site is also a Grade II registered Historic Park and as such Policy 45 of the BLP needs to be considered. These policies state that application within or adjoining a registered historic park or garden will be expected to protect the special features, historic interest and setting of the park or garden. The Council will seek to ensure that the park or garden is appropriately managed or maintained in a manner which reflects its status and designation.
- 7.2.7 In addition, the site is located adjacent to the Holwood Camp Scheduled Ancient Monument (SAM) and is within an area of Archaeological Priority. Policy 46 relates to Scheduled Monuments and Archaeology. This policy is clear that planning permission will not be granted for development that would adversely affect SAMs or Nationally important Archaeological sites, involve significant alterations to them or harm their settings.
- 7.2.8 Policy 37 of the BLP requires all development proposals, including extensions to existing buildings, will be expected to be of a high standard of design and layout. Policy 6 of the BLP states that proposals for alterations and enlargements should respect and complement the host dwelling and be compatible with the surrounding area, this is supported by London Plan Policy D4.
- 7.2.9 Planning permission was granted in 2018 under ref: 18/05386/FULL1 and 2023 under ref: 23/04011/FULL1 for a similar development. However, this was only for a ground floor side addition, which was 5m smaller in width and did not include a basement.

- 7.2.10 Like that permission, the current proposal has been traditionally designed and would attach to an existing modern addition to the east of the building. Although the building has already been extended in the form of a contemporary addition to the east, which has resulted in some unbalancing to the property. However, no in-principle objections have been raised from a heritage perspective from either Historic England or the Council's Conservation Officer, subject to conditions relating to the submission of material samples and detailing, together with landscaping details. These are recommended as pre-commencement conditions and when having regard to the sensitive and historical significance of the building and Park, they are considered both reasonable and necessary to ensure the appropriate materials/details are selected and agreed prior to works commencing to protect the significant of the building and grounds.
- 7.2.11 Historic England have previously raised concerns surrounding wider landscape work within the Park and the number of planning applications which have been submitted over the years for this site, culminating in the overall need for 'site-wide conservation management plan' to help inform the ongoing management of the Park and building. However, this application relates to the extension only, in this case such a requirement is considered to not be directly related to the development and would not meet the necessary tests laid down by para 55 and 56 of the NPPF.
- 7.2.12 In respect of the SAM and Archaeological significance of the site, GLAAS have confirmed that the Archaeological context of the application site is in respect of the proximity of the largest Iron Age hillfort in Greater London and the possible extra mural settlement to its south. The archaeology is of national significance as reflected by its status as a Scheduled Ancient Monument.' No objections have been raised by GLAAS subject to a pre-commencement condition relating to the submission of a written scheme of investigation (WSI) with archaeological strip-map-record program. This pre-commencement condition is necessary to safeguard the archaeological interest of the site particularly given the basement extension. Approval of the WSI before works being on site would provide clarity on what investigations are required, and their timing in relation to the development programme.
- 7.2.13 The applicant has provided information demonstrating the location of the SAM boundary and its position in relation to the development. Although the extension itself does not encroach onto this designated area, the access road track does. An access road leading to the existing garage is already located in this area but would be amended and extended to provide access to the side of the extension. Historic England have recommended that this be relocated, however they have also indicated that if this is not possible then separate Scheduled Ancient Monument consent will be required. This approach was considered acceptable under ref: 23/04011/FULL1. It is therefore considered prudent to include an informative on any permission notifying the applicant of this.
- 7.2.14 In this case, the extension is wider than the previous approved scheme and extends to the basement, but the principle of a side addition was accepted under that 2018 and then 2023 permission, and the current proposal would continue to adjoin an existing modern addition. When having regard to the representations made by HE and the Council's Conservation officer, it is considered that the development would not result in unacceptable harm to, or detract from, the character, appearance and

significance of the Listed Building, Historic Park or the neighbouring Scheduled Monument. It is therefore considered to be in accordance with Policy 6, 37, 39, 45 and 46 of the Bromley Local Plan.

7.3 Impact on the Green Belt – Unacceptable

7.3.1 Paragraphs 142- 156 of the NPPF sets out the Government's intention for Green Belt. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

The Green Belt is intended to serve five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.3.2 Para. 153 deal specifically with development proposals in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

7.3.3 When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

7.3.4 Paragraphs 154 states a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include c) the extension or alteration of a building provided that it does not result in a disproportionate addition over and above the size of the original building.

7.3.5 Policy G2 of the London Plan similarly indicates Green Belts should be protected from inappropriate development. Policy 49 of the BLP is in accordance with the Framework, confirming a presumption against inappropriate development unless very special circumstances exist.

7.3.6 Policy 51 states that extensions or alterations to dwellinghouses in the Green Belt or Metropolitan Open and (MOL) will only be permitted if:

- a - The net increase in the floor area over that of the original dwellinghouse is no more than 10%, as ascertained by external measurement; and
- b - Their size, siting, materials, and design do not harm visual amenities or the open or rural character of the locality; and
- c - The development does not result in a significant detrimental change in the overall form, bulk, or character of the original dwellinghouse.

- 7.3.7 Other development within the curtilage is inappropriate by definition and would only be permitted where very special circumstances have been demonstrated.
- 7.3.8 The Council wishes to ensure that there is no incremental harm to the Green Belt that collectively may jeopardise the open nature of the countryside, or other open land. Development which falls outside the appropriate uses is, by definition, harmful to the Green Belt. The openness and visual amenity of the Green Belt shall not be injured by any proposals for development within or conspicuous from the Green Belt which might be visually detrimental by reasons of scale, siting, materials, or design.
- 7.3.9 When considering an extension, the 'original dwelling' follows the definition of 'original building' in the NPPF: 'A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally'.
- 7.3.10 The current proposal comprises a ground floor and basement extension to provide a car garage over two floors and games room. The bowling alley has been removed from the scope of this application.
- 7.3.11 As noted above, the host building is set within c.50 acres of park land and gardens. It is sited towards the top of Holwood Hill in an elevated position, looking out to out towards gardens, hills, and trees to the south. To the north of the house there is a tennis court, walled garden, pavilion, and Holwood Estate development. There numerous trees surrounding the building.
- 7.3.12 The property has an extensive planning history. This includes a swimming pool and garage extension which was granted under ref: 05/00172/FULL6. At the time of that application, it was noted that the extension was to be in place of several demolished buildings and outbuildings. Based on historical ordnance survey maps and photographs there does appear to have been several structures in this location prior to 2005. The applicant has also provided a floor plan and floor space breakdown for the building as it stood in 1948, existing (current) and proposed. This comparison suggests that the current building is comparable in size to the dwelling that stood in 1948, with it now being c.1sqm smaller at ground floor.
- 7.3.13 The submission shows that the GEA of the proposed ground floor addition to be 325sqm.
- 7.3.14 The basement extension would have a GEA of 325sqm.
- 7.3.15 The total GEA of the additional extended floor area would therefore be 650sqm.
- 7.3.16 The existing building (as it currently stands) has a GEA of 2678sqm and the proposed GEA including basement would measure 3357sqm.
- 7.3.17 This would amount to a 25.3% increase in floor space. This has been reduced from a 30.6% increase in floor space within the refused application.
- 7.3.18 It is noted that planning permission has been granted under ref: 23/04011/FULL1 for a similar development. However, this only allows for ground floor addition, which is also is 5m smaller in width and does not include a basement. At the time, this was

only considered to represent an 8.4% increase in floor area. The current proposal is therefore significantly larger. If, however, the current proposal was contained to the ground floor element only and did not include the basement, the percentage increase would amount to 12.13% as the current ground floor addition is c.99sqm larger than the extant permission.

7.3.19 The property is not however a typical 'dwelling' in terms of its overall scale, and it is such that the floor to ceiling heights is more than 7m in some areas, meaning the existing building is much larger in volumetric terms than the floorspace would suggest.

7.3.20 However, the construction of new buildings within the Green Belt, is by definition, harmful. Exceptions to this include c) the extension or alteration of a building if it does not result in a disproportionate addition over and above the size of the original building.

7.3.21 Local Plan Policy 51 states that extensions or alterations to dwellinghouses in the Green Belt or Metropolitan Open Land (MOL) will only be permitted if the net increase in the floor area over that of the original dwellinghouse is no more than 10%. In this case, the proposal would represent a 25.3% increase. Although, the property is larger in scale than a 'typical' dwelling, the percentage increase in this case is significant and although the basement is below ground level it adds materially to the overall floorspace of the building.

7.3.22 It is however relative to consider the impact of the proposal on the openness of the Green Belt. This has visual and spatial aspects. A large percentage of the floor area and volume would be below ground level and access would be from the upper floor of the extension. This basement element would not therefore have an impact in relation to the visual aspect of openness. However, the widening of the structure by a further 5m over and above the historical permission adds to the mass of the built form and elongates the building to the east and extends the built form into the open setting of the surrounds. The overall quantum of floor space and volume from the basement is also considered to be a relevant consideration in constraining the spread of development in the Green Belt and preventing Urban Sprawl, even if the proposal is not readily seen. Paragraph 142 of the Framework states that 'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.' The absence of harm arising in respect to the visual aspect of openness from the basement is acknowledged but there would nonetheless be an impact on the openness of the Green Belt in relation to its spatial aspect.

7.3.23 It is therefore considered that the proposal would be a disproportionate addition amounting to inappropriate development and would conflict with the purpose of including land in Green Belt.

7.3.24 The Framework goes on to state that 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances.' The applicant contends that the development would enable the relocation and consolidation of several vehicles, which are parked around the building into one internal space which would improve the overall external appearance of the building and site generally, together with the openness of the Greenbelt. In this case, there is already a garage in place and there is no means of controlling how

many vehicles are stored on site, with additional vehicles potentially being stored externally in future even if the extension was built. It is not therefore considered that this justification would amount to VSC which would outweigh the harm to Greenbelt by reason of inappropriateness.

7.3.25 Accordingly, this revised proposal has failed to overcome previous objections and would continue to result in a disproportionate addition that would amount to inappropriate development in Green Belt. Furthermore, it would not preserve the openness of the Green Belt, which would conflict with the purposes of including land within it contrary to Policies 49 and 51 of the Bromley Local Plan, Policy G2 of the London Plan and Chapter 13 of the NPPF.

7.4 Neighbouring Amenity – Acceptable

7.4.1 Policy 37 of the Bromley Local Plan state that the development should respect the amenity of occupiers of neighbouring building and those of future occupants and ensure their environments are not harmed by noise and disturbance or by inadequate daylight, sunlight or privacy or by overshadowing.

7.4.2 Due to the location of the proposed extension the proposed works would not impact on any of the neighbouring occupiers in terms of creating a sense of enclosure loss of sunlight / daylight and loss of outlook.

7.4.3 For these reasons, it is considered that the proposed development is acceptable and complies with policy on neighbouring amenity.

7.5 CIL

7.5.1 The Mayor of London's CIL and Local Borough CIL is a material consideration. CIL is payable on this application.

8 Conclusion

8.1 Having had regard to the above it is considered that the development in the manner proposed is not acceptable as it would amount to inappropriate development in Green Belt and would conflict with the purpose of including land within it.

8.2 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: REFUSE

- 1. The proposal would result in a disproportionate addition that would amount to inappropriate development in Green Belt. Furthermore, it would not preserve the openness of the Green Belt and would conflict with the purposes of including land within it contrary to Policies 49 and 51 of the Bromley Local Plan, Policy G2 of the London Plan and Chapter 13 of the NPPF.**