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## Planning Statement

Cookham Dene, Cookham Dene Close,  
Chislehurst, BR7 5QD

CLIENT: MATT BENARON

NOVEMBER 2023  
DHA/17139



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# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS STATEMENT

1.1.1 This Planning Statement has been prepared by DHA Planning on behalf of the applicant, Matt Benaron, in support of a Householder Planning Application for the reconfiguration of the existing garage, demolition and replacement of existing hardstanding and greenhouse and erection of tennis court and loggia on the footprint of the demolished hardstanding at Cookham Dene, Cookham Dene Close, Chislehurst, BR7 5QD.

1.1.2 The application is described as such:

*"Reconfiguration of existing garage. Demolition of existing hardstanding and greenhouse and erection of replacement facilities alongside associated store. Erection of tennis court and ancillary loggia on the footprint of the demolished hardstanding."*

1.1.3 This Statement provides a detailed overview of the Site, its context, relevant planning history, the proposals, as well as a review of the applicable Development Plan, the National Planning Policy Framework and other relevant guidance. It then assesses the key planning consideration of the application to demonstrate its suitability and availability for the proposed development.

## 1.2 APPLICATION DOCUMENTS AND PLANS

1.2.1 This Statement summarises the proposed development and appraises it in the context of the relevant planning policy requirements. It should be read together with the following documents and plans:

### Documents:

DOCUMENT	REFERENCE	AUTHOR
<b>Application Forms and Ownership Certificate</b>	n/a	DHA Planning
<b>CIL Form</b>	n/a	Matt Benaron
<b>Planning Statement</b>	DHA/17139 (this document)	DHA Planning
<b>Design and Access Statement</b>	30558A_OB_Design and Access Statement	Clague Architects
<b>Heritage Impact Assessment</b>	8234A	HCUK
<b>Tree Survey</b>	AS/MF/087/23	Marcus Foster Arboricultural Design & Consultancy

<b>Arboricultural Survey Impact Assessment and Method Statement Report</b>	AIA/MF/087/23	Marcus Foster Arboricultural Design & Consultancy
<b>Preliminary Ecological Appraisal</b>	KB Ecology PEA Cookham Dene Close Chislehurst	KB Ecology
<b>Bat Survey and Mitigation Strategy</b>	2022/11/22	KB Ecology
<b>Greenbelt Planting Palette</b>	0171_Cookham Dene_Greenbelt Planting Palette_2023.11.01	Farlam & Chandler

TABLE 1.1: SUBMITTED DOCUMENTS

Plans:

PLANS	REFERENCE	AUTHOR
<b>Site Location Plan</b>	30558A_00	Clague Architects
<b>Existing Site Plan</b>	30558A_02	Clague Architects
<b>Proposed Site Plan</b>	30558A_50	Clague Architects
<b>Proposed Garage Floor Plans &amp; Elevations</b>	30558A_1000	Clague Architects
<b>Proposed Glass House</b>	30558A_1200	Clague Architects
<b>Proposed Tennis Loggia</b>	30558A_1300	Clague Architects
<b>Landscape Plan</b>	FCGD_0171P_201_LANDSCAPE PLAN_B	Farlam & Chandler
<b>Soft Landscaping Strategy</b>	FCGD_0171P_202_SOFT LANDSCAPING STRATEGY_B	Farlam & Chandler
<b>Landscape Plan</b>	FCGD_0171P_203_LANDSCAPE PLAN_B	Farlam & Chandler

TABLE 1.2: SUBMITTED PLANS

## 2 SITE AND SURROUNDINGS

### 2.1 SITE OVERVIEW

- 2.1.1 The Site comprises Cookham Dene, a large two-storey detached 19<sup>th</sup> Century dwelling, associated coach house, detached modern garage building, extensive grounds to the east and south, and a large area of hardstanding to the north. The Site is accessible via Cookham Dene Close.
- 2.1.2 To the north, the Site is bound by residential development, comprising of large, detached dwellings, and St. Pauls Cray Road (the A280) beyond this. To the east the Site is bound by woodland and the A280 beyond this. To the south the Site is bound by further large detached residential dwellings associated with Cookham Dene Close, which historically formally constituted part of the wider Cookham Dene estate. To the west, the Site is bound by large detached residential dwellings associated with Manor Park with Cooper's School beyond this.



FIGURE 1.1: EXISTING SITE PLAN EDGED IN RED (CLAGUE ARCHITECTS)

## 2.2 SITE DESCRIPTION

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- 2.2.1 The Site is approximately 1.56 hectares in size and is located within the urban area of Chislehurst and is within the administrative boundaries of the London Borough of Bromley Council ('Bromley Council', 'LBBC', or 'the Council').
- 2.2.2 In reviewing the Council's Planning Policy Map, the Site is located entirely within the Chislehurst Conservation Area, with the grounds located within the Metropolitan Green Belt. It is noted that the east and south Site boundary are immediately adjacent to land designated as Sites of Importance for Nature Conservation (SINC).
- 2.2.3 According to Historic England, there are a number of heritage assets within 400 metres of the Site. Which includes the Grade II Listed Buildings 'Cookham Dene' (located on Site), 'Walsingham Cottage and Attached Walls, Gatepiers, Steps and Gates', 'Saxby's', and 'Manor Court (No 2 Manor House) Nimrod (No 3 Manor House) The Manor House'. Despite this, it is noted that with the exception of Cookham Dene and the Chislehurst Conservation Area, it is not considered that the Site is located within the setting of these heritage assets by virtue of distance, intervening existing built form and vegetation.
- 2.2.4 The Site in its entirety is identified as being located within Flood Zone 1 and consequently is at the lowest risk of flooding.
- 2.2.5 The Site is in close proximity to a number of facilities and services, including a village hall, church, pharmacy, open space, restaurants, convenience store, café, golf course, secondary school, train station, and bus stops. The surrounding areas is characterised by residential development.

## 2.3 ACCESSIBILITY

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- 2.3.1 The Site, according to the Transport for London (TfL) Public Transport Access Level (PTAL) map, the Site has a PTAL rating of 1b.
- 2.3.2 The Site is accessible from Cookham Dene Close, which connects to Manor Park and St. Pauls Cray Road (the A208) beyond this, which provides a connection to Coldharbour Estate and Eltham when travelling north, and Petts Wood and Orpington when travelling south. By car, the Site is approximately 2.6 miles from the Sidcup By-Pass Road (the A20), the A20 provides a connection to surrounding locations such as Swanley, Orpington, and Sidcup in the east, and Eltham and Lewisham in the west.
- 2.3.3 The closest bus stop 'Manor Park Road' Stop ID: 50099 is located approximately 170 metres north of the Site. From this stop, the '273' and '61' can be accessed, which provides a frequent connection to Bromley North and Petts Wood. Alternatively, 'Manor Park Road' Stop ID: 49874 is located approximately 275

metres north west of the Site which provides access to the same frequent services, which provide a connection to Lewisham and Chislehurst.

- 2.3.4 Chislehurst Train Station is located approximately 1.57 kilometres west of the Site and provides access to regular services to Orpington, London Cannon Street, London Charing Cross, and Sevenoaks via the southeastern service.
- 2.3.5 From the mouth of Manor Park, all of the above services can be reached by foot on continuous, wide, and lit footpaths that are in good condition.

## 2.4 PREVIOUS PLANNING HISTORY

- 2.4.1 It is noted that whilst the wider Site has been the subject of a number of planning applications, it is considered that their relevance is reduced due to the large amount of time and changes in planning context, since the applications were permitted and therefore, they are not considered entirely relevant to this application. For completeness, the Site has been the subject of the following applications:

REFERENCE	DESCRIPTION	DECISION
<b>83/01018/OUT</b>	USE OF PART OF GROUND FLOOR AS OFFICES AND FIRST AND SECOND FLOORS AS 3 SELF CONTAINED FLATS COOKHAM DENE ERECTION OF 6 DETACHED HOUSES IN GROUNDS PART OUTLINE.	Granted Outline Permission August 1983.
<b>85/00842/FUL</b>	DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF DETACHED REPLACEMENT BUILDING	Refused Permission December 1985.
<b>87/00947/FUL</b>	DETACHED BLOCK OF 3 REPLACEMENT GARAGES	Refused Permission August 1987.
<b>89/02272/FUL</b>	DETACHED TRIPLE GARAGE WITH STORE OVER	Refused Permission November 1990.
<b>93/01611/CON</b>	DEMOLISH EXISTING WALL TO YARD CONSERVATION AREA CONSENT THE LODGE COOKHAM DENE CLOSE MANOR PARK.	Refused Permission September 1993
<b>03/04001/CAC</b>	DEMOLITION OF TRIPLE GARAGE CONSERVATION AREA CONSENT	Granted Conservation Area Consent December 2003.
<b>06/02446/FULL1</b>	DEMOLITION OF EXISTING OUTBUILDING AND REPLACEMENT WITH DETACHED TWO STOREY BUILDING WITH DOUBLE GARAGE AND SWIMMING POOL AT GROUND FLOOR WITH PRIVATE GYMNASIUM AND CHANGING ROOM FACILITIES AT FIRST FLOOR WITH TWO FRONT DORMERS.	Refused Permission October 2006
<b>06/02447/CAC</b>	DEMOLITION OF EXISTING OUTBUILDING CONSERVATION AREA CONSENT	Refused Permission October 2006.
<b>16/03081/TREE</b>	VARIOUS TREEE WORKS (FULL DETAIL AVAILABLE ON BROMLEY COUNCIL WEBSITE).	No Objection August 2016.



TABLE 2.1: PLANNING HISTORY (EXTRACTED FROM BROMLEY COUNCIL'S PLANNING APPLICATION SEARCH)

## 2.5 GARAGE BUILDING APPLICATIONS

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- 2.5.1 As noted in Table 2.1 above, the Site has previously been the subject of a number of applications (85/00842/FUL, 87/00947/FUL, 89/02272/FUL, 03/04001/CAC, 06/02446/FULL1, and 06/02447/CAC) for works to the existing triple car garage comprising renovations, extensions, demolition, and redevelopment. In all instances, the applications were subsequently refused, barring application reference: 03/04001/CAC for the building's demolition. For the refused applications, the reasons for refusal relate to conflicts with the Green Belt, Conservation Area or Listed Building.
- 2.5.2 It is noted that whilst a number of the above applications are relevant to the development as proposed it is noted that application references: 85/00842/FUL, 87/00947/FUL, 89/02272/FUL, and 03/04001/CAC, when viewed on the Council application portal are not supported by any drawings. However, it is noted that application reference 06/02446/FULL1 and associated Conservation Area Consent application (reference: 06/02447/CAC) are supported by a full suite of drawings. Within these drawings it is noted that the proposed garage and swimming pool building was substantially larger than the existing garage, in addition to this they do not reflect the architectural style or materials of the existing buildings on Site.

## 3 PROPOSED DEVELOPMENT

### 3.1 OVERVIEW

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3.1.1 As previously noted, the Applicant seeks Householder Planning Permission for the reconfiguration of the existing garage, demolition and replacement of existing hardstanding and greenhouse and erection of tennis court and loggia on the footprint of the demolished hardstanding at Cookham Dene, Cookham Dene Close, Chislehurst, BR7 5QD.

3.1.2 The application is described as such:

*"Reconfiguration of existing garage. Demolition of existing hardstanding and greenhouse and erection of replacement facilities alongside associated store. Erection of tennis court and ancillary loggia on the footprint of the demolished hardstanding."*

### 3.2 EXISTING SITUATION

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3.2.1 It is noted that the Site currently benefits from a large triple garage building (demarked in red) and a large area of hardstanding with planting areas and associated greenhouse (demarked in red dashes) as shown below in Figure 3.1.



FIGURE 3.1: SATELLITE PHOTOGRAPH OF THE EXISTING SITE (GOOGLE EARTH)

### 3.3 RECONFIGURED GARAGE

- 3.3.1 It is proposed that the existing garage building will be reconfigured externally, the reconfigurations comprise extending the two garage doors and the addition of a pedestrian access door on the principal elevation, the façade of the garage building will be altered to ensure the garage building, by virtue of being a modern appearance, will be made to be more sympathetic to the existing buildings on Site, the Chislehurst Conservation Area, and Cookham Dene. It is noted that the garage is a modern garage and therefore is not curtilage listed, in view of this no Listed Building Consent is required for the proposed garage works.
- 3.3.2 Internally, the building will offer space for two vehicles on the ground floor, with a staircase proposed in the north eastern corner of the building, which will provide access to the security office on the first floor, as shown in Figure 3.2. below.

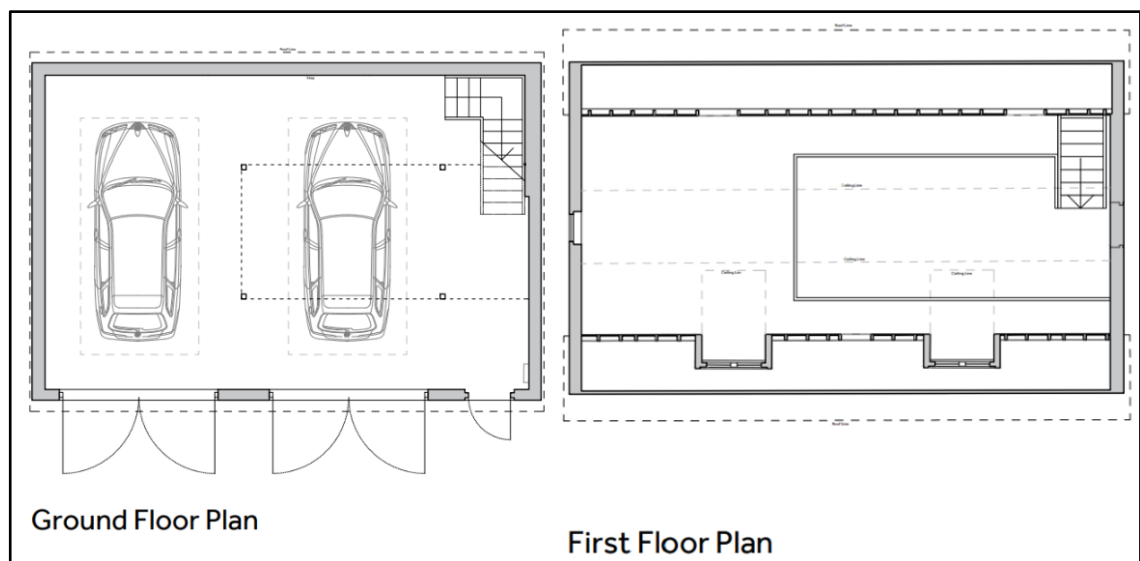


FIGURE 3.2: PROPOSED GARAGE FLOOR PLANS (CLAGUE ARCHITECTS)

- 3.3.3 The garage will continue to be accessed on the south elevation via one of two garage doors or the pedestrian door as shown below in Figure 3.3.

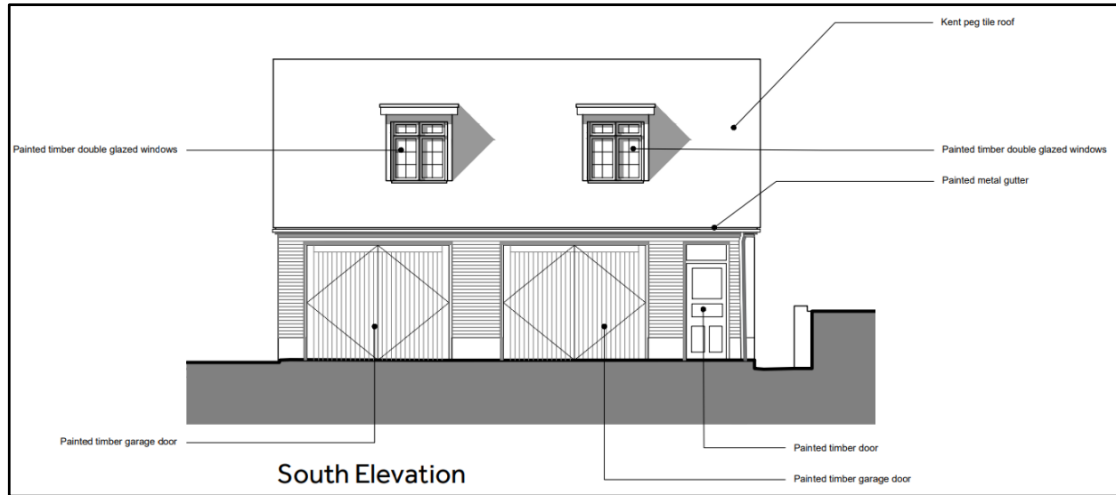


FIGURE 3.3: PROPOSED SOUTH ELEVATION OF GARAGE (CLAGUE ARCHITECTS)

3.3.4 The proposed building has been sensitively designed to provide a modest yet functional floorspace, whilst ensuring the development reflects the appearance of a traditional 19<sup>th</sup> Century building. Materially, the building has been designed to complement Cookham Dene and the adjacent Coach House, comprising red brick walls. The two dormers finished with render panels as seen on the Coach House provide additional light internally through painted timber windows, allowing the building to assimilate within the Site, the roof will be finished with Kent peg tiles to match buildings within the Site, with a painted metal gutter fixed below the eaves on the north and south elevations. On the east and west elevations, painted timber verge boards are proposed to finish the roof, with masonry and render panels within the gable ends as demonstrated in Figure 3.3 above, and Figure 3.4 below.

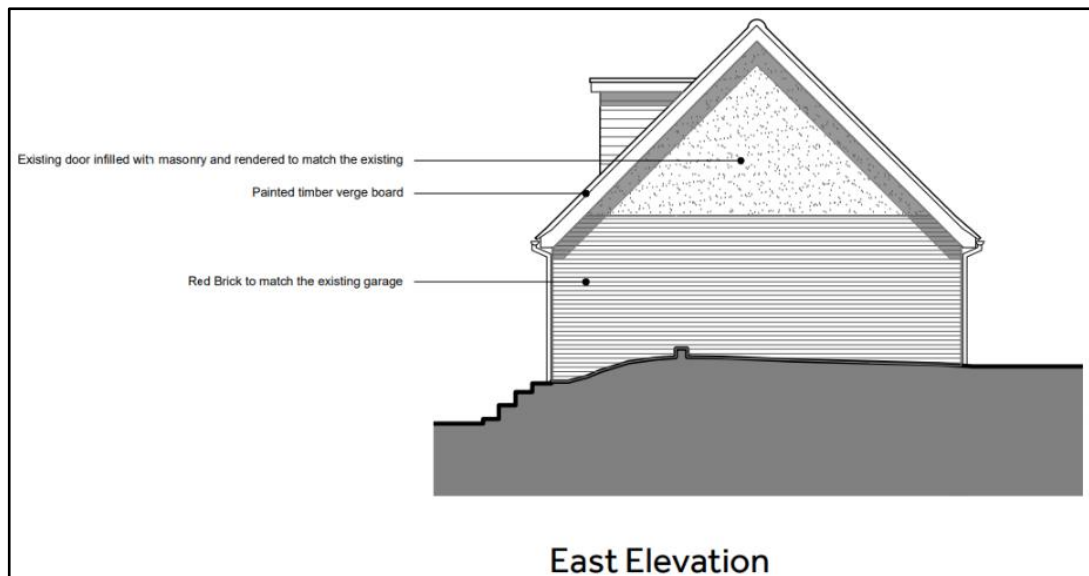


FIGURE 3.4: PROPOSED EAST ELEVATION OF GARAGE (CLAGUE ARCHITECTS)

### 3.4 PROPOSED KITCHEN GARDEN AND GREENHOUSE

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- 3.4.1 The proposed kitchen garden and greenhouse with associated store will be located approximately 40 metres north east of Cookham Dene, its location has been selected due to being within a well screened and compartmentalised section of the Site, ensuring the preservation of the openness of the Green Belt.
- 3.4.2 The kitchen garden will be broadly rectangular in shape, being of a similar scale of the existing kitchen garden. The proposed greenhouse will take a broadly rectangular shape, with the associated store taking the shape of a square, both buildings are modest in scale and are suited to their required use.
- 3.4.3 The proposed kitchen garden, greenhouse and associated store have been sensitively designed to re-provide and improve the existing facility, whilst ensuring the development preserves the openness of the Green Belt and respects Cookham Dene and the Chislehurst Conservation Area. Materially, the proposed kitchen garden and greenhouse with store building have been designed to minimise any visual impact, helping the development to assimilate into the landscape of the wider grounds of Cookham Dene. The greenhouse will be erected on a red brick plinth and be constructed of PPC aluminium and glass, the supporting wall will be constructed of red brick to match the existing buildings on Site. The store to the rear will be finished with timber cladding and a felt roof.
- 3.4.4 The principal elevation of the greenhouse is south facing and addresses the kitchen garden, with the store addressing the northern Site boundary. The internal floorspace of the greenhouse and associated store measures approximately 9.19 metres in length and approximately 3.60 metres in width, externally the building is approximately 10.00 metres in length and approximately 4.00 metres in width. The building at its highest point (i.e., along the ridge line that runs east to west) is approximately 4.37 metres as shown in Figures 3.5 and Figure 3.6 below.

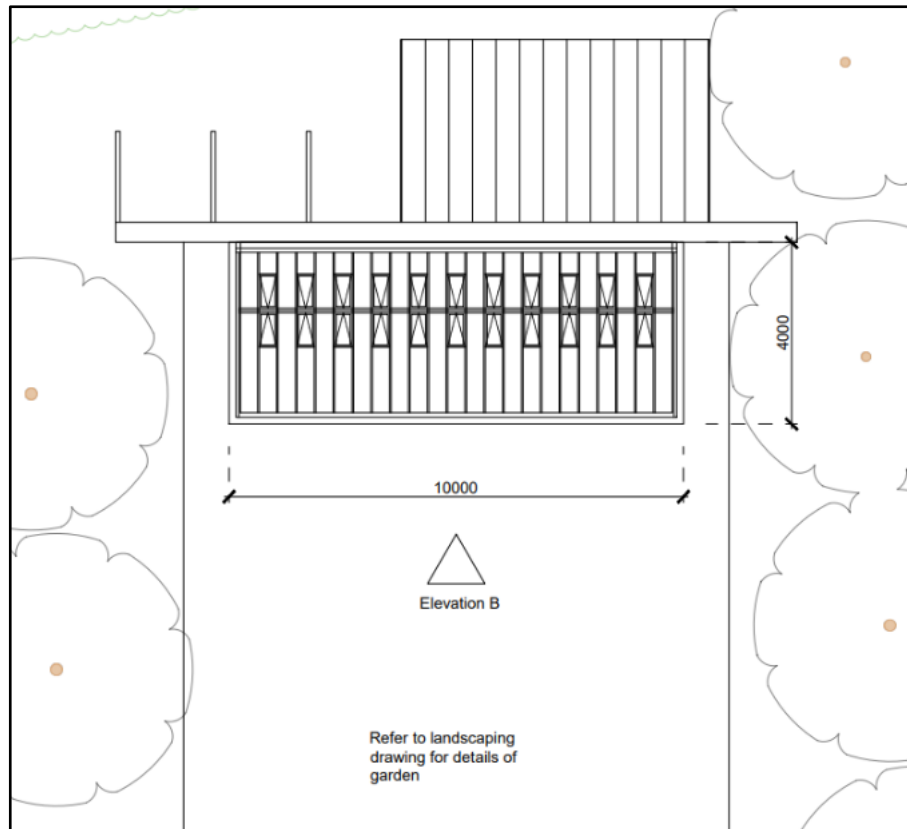


FIGURE 3.5: PROPOSED INTERNAL FLOOR PLANS OF GREENHOUSE AND ASSOCIATED STORE (CLAGUE ARCHITECTS)

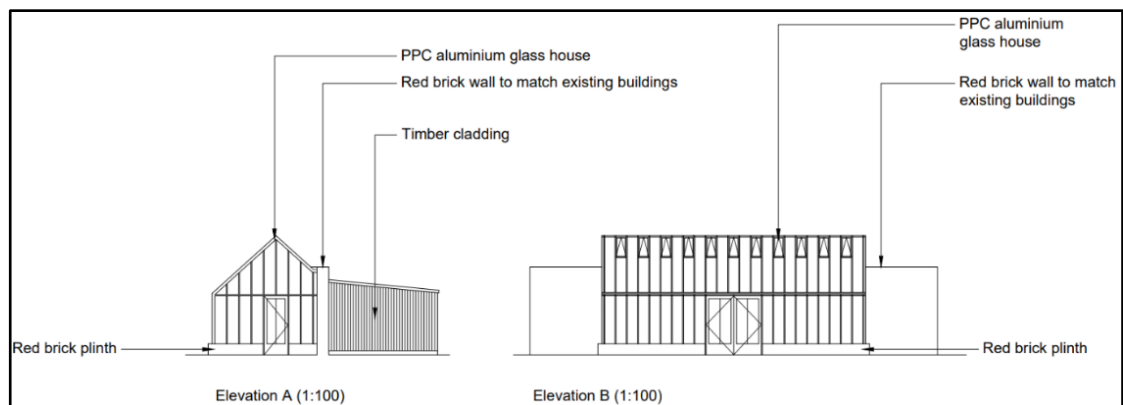


FIGURE 3.6: PROPOSED ELEVATIONS OF GREENHOUSE AND ASSOCIATED STORE (CLAGUE ARCHITECTS)

3.4.5 A supporting brick wall abuts the greenhouse on the north and is approximately 3.22 metres in height, runs the length of the greenhouse, and is approximately 0.44 metres in width, shown in Figure 3.4 above. Beyond this, the associated store is approximately a maximum of 2.58 metres in height, reducing to 2.19 metres. The internal floorspace of the associated store is approximately 14.80 metres in length, and 2.89 metres in width, externally the building is

approximately 14.99 metres in length, and 2.99 metres in width as shown in Figure 3.4 above and Figure 3.7 below.

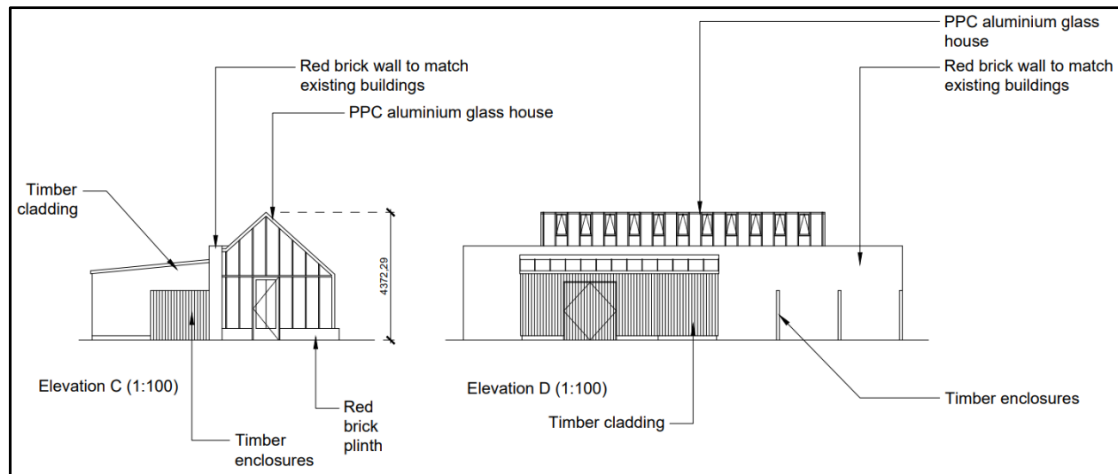


FIGURE 3.7: PROPOSED ELEVATIONS OF GREENHOUSE AND ASSOCIATED STORE (CLAGUE ARCHITECTS)

### 3.5 PROPOSED TENNIS COURT

- 3.5.1 The proposed tennis court and associated loggia is located approximately 50 metres east of Cookham Dene, its location has been selected due to being located in the same location of the existing greenhouse, hardstanding, and kitchen garden. Redeveloping this section of the Site with a development of a similar scale ensures the preservation of the openness of the Green Belt.
- 3.5.2 The tennis court takes the shape of a broad rectangle, with the tennis loggia taking a similar shape at a reduced scale. The loggia is modest in scale and entirely suited to its ancillary function as a rest area for those utilising the tennis court, the court itself will take the form of a full-size tennis court. The loggia will provide covered seating and drinks store.
- 3.5.3 The tennis court and associated loggia have been sensitively designed to be located in a location of existing hardstanding, whilst ensuring openness of the Green Belt is preserved, with only the tennis loggia serving as built form, the development also respects the Chislehurst Conservation Area and Cookham Dene. Materially, the proposed tennis loggia has been designed to minimise any visual impact, which allows the development to easily assimilate within the wider grounds of Cookham Dene. The loggia will feature stacked Kent peg tile columns which will support the Kent peg tile roof.
- 3.5.4 The principal elevation of the loggia is west facing and addresses the proposed tennis court. Given the open-nature design of the loggia, the internal floorspace is akin to the building's external measurements. The internal floorspace of the loggia measures approximately 4.00 metres in width and approximately 10.00 metres in length as shown in Figure 3.8 below.

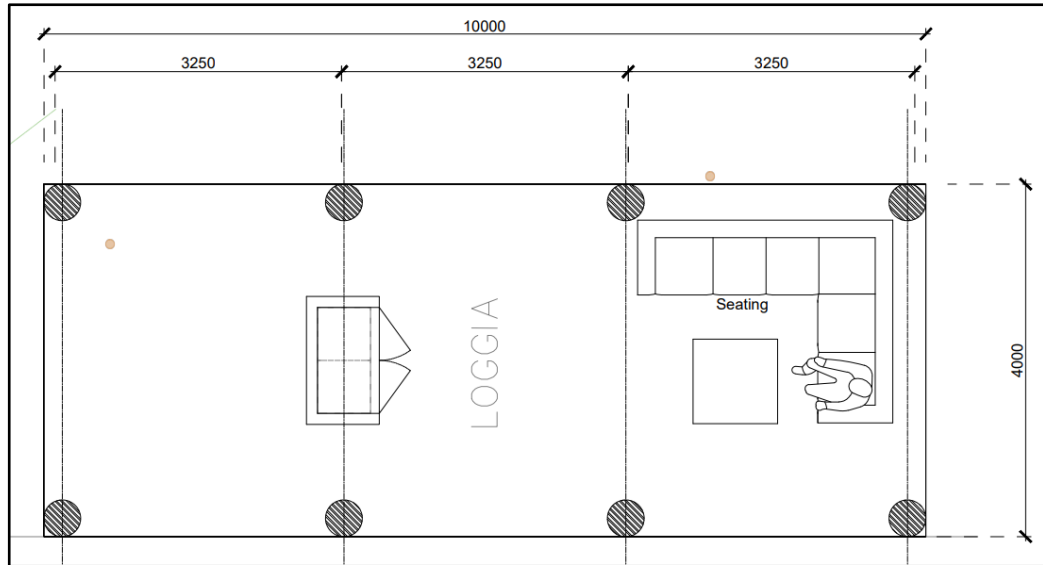


FIGURE 3.8: PROPOSED TENNIS LOGGIA FLOORPLAN (CLAGUE ARCHITECTS)

3.5.5 The loggia, at its highest point (i.e., along the ridge line that runs north to south) is approximately 4.78 metres, as shown in Figure 3.9 below. In regard to all elevations, it is noted that to ensure the preservation of openness, 8no. stacked Kent peg tile columns are proposed. Each stacked Kent peg tile column is approximately 0.42 metres in width and from the centre of each column, are set approximately 3.25 metres apart, as visible in Figure 3.8 above.

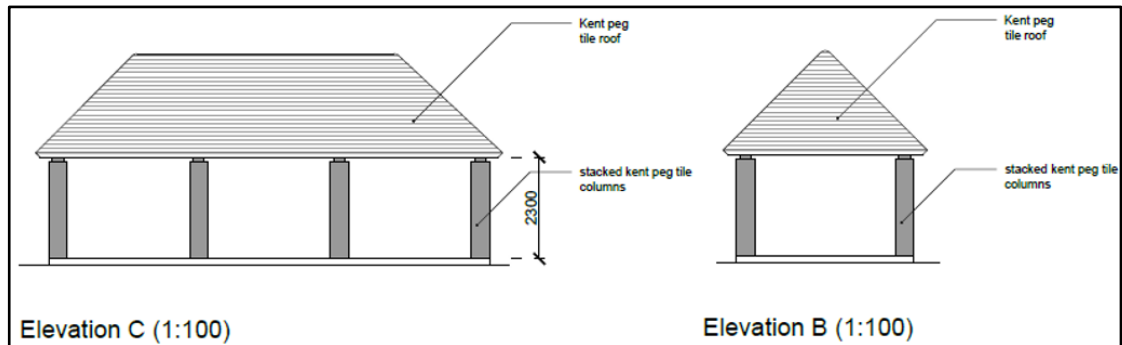


FIGURE 3.9: PROPOSED ELEVATIONS OF TENNIS LOGGIA (CLAGUE ARCHITECTS)



## 4 PLANNING POLICY FRAMEWORK

### 4.1 OVERVIEW

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- 4.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications are required to be determined in accordance with the provisions of the Development Plan in force unless material considerations indicate otherwise. This section sets out the relevant policies of the statutory Development Plan and refers to any other material considerations that should be taken into account in the determination of this application.
- 4.1.2 Rather than rehearsing policies, this section highlights relevant policies applicable to the application at hand. Policies are then explored in further detail within the below section.
- 4.1.3 In this case, the following documents are relevant to the application:
- Bromley Council Local Plan (2019);
  - London Plan (2021); and
  - The National Planning Policy Framework (September 2023).
- 4.1.4 Adopted Supplementary Planning Documents (SPDs) are also a material consideration where appropriate but are not part of the Development Plan. Other material considerations include:
- Urban Design Guide (2023) – Supplementary Planning Document;

### 4.2 BROMLEY COUNCIL LOCAL PLAN (2019)

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- 4.2.1 The following Policies within the Bromley Local Plan are deemed relevant to the proposed development:
- **Policy 8:** Side Space;
  - **Policy 37:** General Design of Development;
  - **Policy 38:** Statutory Listed Buildings;
  - **Policy 41:** Conservation Areas;
  - **Policy 43:** Trees in Conservation Areas;
  - **Policy 49:** The Green Belt;
  - **Policy 57:** Outdoor Recreation and Leisure;
  - **Policy 73:** Development and Trees; and
  - **Policy 123:** Sustainable Design and Construction.

### 4.3 LONDON PLAN (2021)

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4.3.1 The following Policies within the London Plan are deemed relevant to the proposed development:

- **Policy GG1:** Building Strong and Inclusive Communities;
- **Policy GG2:** Making the Best Use of Land;
- **Policy D1:** London's Form, Character, and Capacity for Growth;
- **Policy D3:** Optimising Site Capacity Through the Design-Led Approach;
- **Policy D4:** Delivering Good Design;
- **Policy S5:** Sports and Recreation Facilities;
- **Policy HC1:** Heritage Conservation and Growth;
- **Policy G2:** London's Green Belt;
- **Policy G6:** Biodiversity and Access to Nature; and
- **Policy G7:** Trees and Woodlands.

### 4.4 NATIONAL PLANNING POLICY

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#### National Planning Policy Framework (NPPF), Updated September 2023

4.4.1 The NPPF sets out the Government's planning policies for England and puts "*the presumption in favour of sustainable development*" at the heart of the planning system. Those sections of the NPPF which are relevant to the determination of this application include:

- **Section 2:** Achieving Sustainable Development;
- **Section 4:** Decision Making;
- **Section 8:** Promoting Healthy and Safe Communities;
- **Section 12:** Achieving Well-Designed Places;
- **Section 13:** Protecting Green Belt Land;
- **Section 15:** Conserving and Enhancing the Natural Environment; and
- **Section 16:** Conserving and Enhancing the Historic Environment.

#### Planning Practice Guidance

4.4.2 The Planning Practice Guidance (PPG) builds on principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance. The PPG is a 'living document' and is constantly being updated / reviewed.

4.4.3 As well as providing technical guidance the PPG sets out the importance of good design. It advocates the need for quality of design which it considers is an integral part of achieving the fundamental objective of sustainable development. The relevant sections of the PPG are listed below:

- Community Infrastructure Levy;
- Design: Process and Tools;

- Green Belt;
- Historic Environment;
- Natural Environment;
- Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space; and
- Tree Preservation Orders and Trees in Conservation Areas.

## 5 PLANNING CONSIDERATIONS

### 5.1 INTRODUCTION

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- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permissions to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.1.2 It is necessary to consider whether the application proposal accords with the statutory Development Plan and, if not, whether any material considerations indicate that planning permission should nevertheless be granted.
- 5.1.3 This Statement provides a Planning Assessment for the proposed development demonstrating how the proposal complies with the relevant material planning considerations, and whether the development would have an unacceptable impact on the Conservation Area.
- 5.1.4 In light of this, the following matters are considered to be relevant to this Planning Application:
- Principle of Development;
  - Heritage Considerations and Impact Upon the Setting of the Listed Building and the Character and Appearance of the Surrounding Conservation Area;
  - Design, Layout, and Scale;
  - Residential Amenity;
  - Landscaping and Trees;
  - Ecology and Biodiversity;
  - Highways and Access; and
  - Flood Risk.

### 5.2 PRINCIPLE OF DEVELOPMENT

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- 5.2.1 Policy 49 of the Local Plan is clear that permission will not be granted in the Green Belt when proposals comprise inappropriate development, unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm. The Policy highlights the instances whereby development will not be considered inappropriate:

*"appropriate facilities for outdoor sport and outdoor recreation and cemeteries which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it".*

- 5.2.2 London Plan G2 supports this noting that the Green Belt should be protected from inappropriate development. This is underpinned by NPPF Paragraph 147 which is clear that inappropriate development is by definition harmful to the Green Belt and therefore should not be approved except in very special circumstances. The exceptions to this are set out within Paragraph 149, which is clear that:

*"b) the provision of appropriate facilities (in connection with the existing use of land or change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it".*

- 5.2.3 In view of the above, it is noted that the playing of tennis and planting and management of fruits, vegetables, and herbs alongside the associated buildings as proposed is in complete accordance with the exception in Paragraph 149 and Local Plan Policy 49, therefore these elements of the development are not considered to be inappropriate development within the Green Belt. In view of this, it is not considered that the proposals conflict with NPPF Paragraph 149(b), however, it is submitted that this exception is subject to the development preserving the openness of the Green Belt and not conflicting with the purposes of including land within it. Which is set out in NPPF Paragraph 138:

*"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."*

- 5.2.4 In view of the criteria below, it is noted that the development would not represent unrestricted sprawl given that the proposed tennis court and loggia, alongside the kitchen garden and greenhouse with associated store are located within the well-defined and defensible boundaries of Cookham Dene, the development is also modest in scale. It is reiterated that the Site boundaries are well defined with boundary walls, woodland, and mature vegetation that screen the Site. The development is located within an area that is predominantly urban and residential in character, where outdoor recreational activity and sport is commonplace (with a large number of external tennis courts and swimming pools within the immediate vicinity). In a similar vein, the development will not see the merging of neighbouring towns, by virtue of the Site's defensible boundaries, in addition to the dense woodland at St Paul's Cray Road, the Site and development is located

within the urban boundaries of Chislehurst and therefore the development will not encroach on the countryside. Additionally, the development will not affect a historic town, by virtue of its location within Site, being secluded, screened and well compartmentalised. Given this, the proposals are not considered to conflict with the purposes of including land within the Green Belt.

- 5.2.5 In terms of openness of the Green Belt, it is noted that there is both a spatial and visual consideration. Spatially, the development is located within an area of the grounds that is partly developed, in close proximity to the northern Site boundary which is densely vegetated and a defensible boundary. The development is modest in scale, detached and located perpendicular to Cookham Dene, the facilities and scale of development is commensurate with the size of the grounds associated with Cookham Dene. The development emulates the architectural design and materials of built form across the Site, allowing it to easily integrate within the grounds, it is located in a well-compartmentalised portion of the Site, i.e., not in the open grounds, with minimal visibility from Cookham Dene itself. By virtue of this, it is not envisaged that the development will reduce the openness of the Green Belt. Visually, whilst the land immediately surrounding the Site is relatively flat, the wider landscape is characterised by urban development and dense vegetation with mature woodland, St. Pauls Cray Road, further woodland, and residential development lie to the east. The proposed development is sited in proximity to the existing residential development associated with Cookham Dene Close, largely in locations of existing development. It is noted that the dense vegetation and mature woodland screening the Site from the road and existing buildings, ensures the development will not be visible from outside of the Site. It is noted that any extremely limited views would be restricted due to the height and density of intervening trees, vegetation, and woodland by virtue of the height of the proposed development. Consequently, in visual terms the proposed development would not erode the openness of the Green Belt.
- 5.2.6 In regard to the alterations of the garage, by virtue of no new physical built form being erected, the development is therefore entirely in complete accordance with the NPPF and the objectives of the Green Belt.
- 5.2.7 Overall, it is considered that no harm to the visual or spatial openness of the Green Belt will result in light of the proposed development, thus ensuring that the openness of the Green Belt is preserved, consequently, the proposals do not comprise inappropriate development in the Green Belt and is therefore entirely in accordance with NPPF Paragraph 149(b) and 149(d), alongside Local Plan Policy 49 and London Plan Policy G2.
- 5.2.8 London Plan Policy GG1 is clear that developments should ensure that new buildings are designed to reinforce or enhance the identity and legibility of neighbourhoods. It is noted that the development design and impacts on heritage assets is explored in further detail within Sections 5.3 and 5.4 of this Statement, however, the development will reinforce the identity of the high-status Grade II Listed Cookham Dene, providing facilities that are commonplace for dwellings such as this and other dwellings within Cookham Dene Close. The development will emulate the architectural style and materials by respecting the Conservation

Area and Cookham Dene, through ensuring the views of the asset are maintained or improved.

- 5.2.9 Policy D3 of the London Plan is also clear that site capacity should be optimised through the design-led approach, which states that to enhance the local context, with buildings responding positively to local distinctiveness through scale, orientation, layout, form, and proportions. It is therefore noted that the proposed development is modest in scale, being no larger than required for the purposes of re-providing the existing garage and kitchen garden with greenhouse, and the provision of a tennis court with associated loggia, with the alteration to the garage leading to no new built form. The development has been designed to maintain views to Cookham Dene, with minimal visual impacts to views from the south of the grounds. It is submitted that as part of the development only the store (connected to the greenhouse) and the tennis court with associated loggia are 'new' development on Site, with the store screened from views being located behind the greenhouse and supporting wall, the loggia being low-rise and open-aired to allow for views through it, and the tennis court requiring only minimal changes. It is therefore considered that the development can be comfortably accommodated within the Site, easily integrating into the grounds of Cookham Dene.
- 5.2.10 Additionally, within National Planning Policy Framework (NPPF) Paragraph 11, it is clear that plans and decisions should apply a presumption in favour of sustainable development, which for decision-making means that applications that are in accordance with an up-to-date Development Plan, which the proposals are, should be approved without delay.
- 5.2.11 In view of the above, and noting the acceptability of sports and recreational facilities, alongside replacement buildings in the Green Belt, it is considered that the development as proposed is considered wholly acceptable in principle and is therefore in accordance with the NPPF, the London Plan, and Bromley Local Plan.

### **5.3 HERITAGE CONSIDERATIONS AND IMPACT UPON THE SETTING OF THE LISTED BUILDING AND THE CHARACTER AND APPEARANCE OF THE CONSERVATION AREA**

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- 5.3.1 Local Plan Policy 38 notes that development involving the setting of a Listed Building will be permitted provided that the character, appearance and special interest are preserved and there is no harm to its setting. Local Plan Policy 41 takes this further noting that proposals within a Conservation Area will be required to preserve and enhance its characteristics and its appearance by respecting or complementing the layout, scale, form, and materials of existing spaces and buildings, and through respecting and incorporating the design of existing landscape or other features that contribute to character. This is developed further by Policy HC1 of the London Plan which notes that proposals affecting the setting of a heritage asset should conserve its significance by being sympathetic to its significance and appreciation of the asset's surroundings. NPPF Paragraph 206

reinforces this, noting that Councils should look for development opportunities within Conservation Areas and the setting of heritage assets to enhance or better reveal their significance, proposals that preserve the elements of the setting that make a positive contribution to the asset should be treated favourably.

- 5.3.2 The Site falls within the Chislehurst Conservation Area, with the proposed development falling within the Grounds of Cookham Dene. Whilst a Heritage Impact Assessment (HIA) has been prepared by HCUK Group (September 2023) and is submitted alongside the application. The proposed development is not considered to affect the setting of the heritage assets. The HIA assesses the impact and significance of the proposed development on designated heritage assets.
- 5.3.3 The setting of Cookham Dene contributes to its architectural and historical interest, however, this has seen change since the new houses were developed in 1985. The high status of the dwelling is reinforced by the size of the gardens and grounds of the dwelling, which have maintained the character of the spacious plot. The HIA is clear that the main house is most notably appreciated from the front (looking south and east) in conjunction with the Coach House.
- 5.3.4 The Chislehurst Conservation Area was designated in February 1972 and comprises the original designated area combined with additional areas such as Chislehurst East and West, designated in March 1982, alongside a subsequent minor boundary change in 1999. The designated area is predominantly residential in the west with rural and agricultural land in the east, overall, it contains a diversity of development forms and open space.
- 5.3.5 In view of this, it is noted that the proposed loggia and greenhouse and existing garage are small ancillary buildings that are designed to provide additional amenity for the main house, having been designed in a traditional form, using materials that match the existing house and coach house to ensure the setting of Cookham Dene is preserved. The introduction of a tennis court and kitchen garden with small accompanying structures is entirely in keeping with the status of Cookham Dene as a country residence that would have once had access to both amenities. The HIA notes that the houses built in the 1980s to the southwest of Cookham Dene have tennis courts and swimming pools which are located in the rear gardens of smaller dimensions, with the existing dwelling there is sufficient space within the grounds for these additions to be added without any effect on the listed house or the coach house.
- 5.3.6 The HIA notes that the fencing around the tennis court is proposed as natural timber, allowing open views across the court. With the kitchen garden similarly being delineated by hedges. The alterations to the existing garage is set back from the existing coach house and will have a neutral effect on the setting of the listed buildings, with the garage continuing to provide car parking spaces and a security office internally.
- 5.3.7 Key views of Cookham Dene will not be affected by the addition of the proposed outbuildings, which are sympathetically located and designed. By using architectural styles that complement the architectural language of Cookham Dene



the potential of the Site as a whole would be realised and its longevity secured. With the buildings not visible from the wider area due to the dense vegetation in all directions from other plots. Multiple views from the grounds that are glimpsed through existing tree cover and evergreen hedges which are to be retained in the new landscaping scheme which means these buildings would not interfere with any key views toward the listed buildings. The HIA notes that there would be no harmful effect on the heritage values of Cookham Dene as a result of the proposed outbuildings.

- 5.3.8 In regard to the Chislehurst Conservation Area, it is noted that the proposed tennis court and loggia, kitchen garden, greenhouse and associated store, and reconfiguration of the existing garage have been designed to respect the character and appearance of the Conservation Area. Being low key, traditionally detailed buildings and spaces, that assimilate into the landscape and take advantage of the space east of the house. The structures will not be visible within the Conservation Area aside from limited locations within the Site and therefore no harm will occur to the Conservation Area as a result of the proposed development.
- 5.3.9 In view of this, the proposals will produce no detrimental impact on the Listed Building, ancillary Coach House, or the Chislehurst Conservation Area as a result of the development, by virtue of the low rise nature and sensitive design of the development, in addition to its location within Site. Therefore, the proposals will result in no harm to the significance of either the Listed Building or Conservation Areas as a result of the proposed development being granted permission. In this instance Paragraphs 201-202 of the NPPF are not engaged, and the development is in complete accordance with Local Plan Policies 38 and 41, London Plan Policy HC1, and Paragraph 206 of the NPPF.

## 5.4 DESIGN, LAYOUT, AND SCALE

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- 5.4.1 Local Plan Policy 37 is clear that all developments are expected to be of a high standard of layout and design, with development being imaginative and attractive to look at, being of good architectural quality and completing the scale, proportion, form, layout and materials of adjacent buildings and areas, whilst positively contributing to and respecting heritage assets. London Plan Policy D4 develops this further, placing an emphasis on the delivery of development that is of a high quality design and sees to enhance and contribute to the setting of the local area. This is supported by Paragraph 126 of the NPPF, which notes that the creation of high quality, beautiful, sustainable buildings and places is fundamental to what the planning and development process should achieve. With good design being a key aspect of sustainable development alongside creating better places in which to live and work.
- 5.4.2 Whilst it is submitted that the proposals fall within a sensitive location, owing to its location within the Metropolitan Green Belt, within the grounds of the Grade II Listed Building 'Cookham Dene' and within the Chislehurst Conservation Area. It is noted that the garage re-development has been sensitively designed to complement the aesthetics of Cookham Dene, the Coach House, and walls within

the Site, given the use of red brick and Kent peg tile with replicated details (i.e., timber sash windows and timber doors) within the proposals.

- 5.4.3 Similarly, the tennis court and associated loggia have been designed in a similar manner, with the loggia reflecting the Kent peg tile details on the roof and supporting columns, the tennis court itself will be low rise in nature and surrounded by a hedgerow to assist in screening the development, it has also been sensitively located on the existing hardstanding to ensure minimal undeveloped areas are developed.
- 5.4.4 It is highlighted that the proposed alterations of the garage building will serve as a betterment over the existing situation, which does not achieve the same architectural merit of the main house or the Coach House, therefore the garage will be read as a subservient structure to the main house and is therefore very much in keeping with the aesthetic of the existing built form on Site.
- 5.4.5 The kitchen garden, greenhouse, and associated store have been designed to retain the features as existing on Site, whilst improving the facility through providing an attractive decorative supporting wall (which is in keeping with the red brick walls seen around the Site) which screens the associated store and ensures a minimal level of visual impact. Aside from the garage building which is located on the footprint of the existing garage, the development has been located within a well screened and compartmentalised section of the Site (in the northernmost section, north of the open grounds) the development is entirely at a scale that allows functional use whilst ensuring minimal visual impacts.
- 5.4.6 In view of the above, it is considered that all elements of the development will easily assimilate with the Site surroundings, and it is one that will be read as a series of subservient and ancillary facilities and structures located in the grounds to the main house. The proposals are therefore very much in keeping with the aesthetics of the existing built form on Site.
- 5.4.7 The siting of the tennis court and associated loggia, alongside the kitchen garden, greenhouse and associated store have been carefully located in the northernmost section of the Site to ensure they preserve the openness of the Green Belt and do not give rise to any visual impacts. Locating the tennis court and associated loggia on the footprint of the existing kitchen garden hardstanding ensures that the development utilises a previously developed element of the Site. By virtue of this portion of the development being located perpendicular to the dwelling, visibility is reduced, however, it is noted that due to the nature of the proposed development (i.e., low rise and compatible with the Site), the development would give rise to minimal visual impacts.
- 5.4.8 Overall, given the approach to the design of the development, its proposed scale, bulk and massing, alongside the choice of architectural style and materials is considered to ensure that the proposals easily assimilate within the setting of the Cookham Dene grounds, within the Green Belt and the Chislehurst Conservation Area. It is considered that the replacement garage building will comfortably integrate within the grounds of Cookham Dene, by virtue of emulating the

architectural design and materials of the main house and ancillary structures. The replacement kitchen garden and greenhouse, alongside the associated store that is screened by the greenhouse are of a similar scale and design to that as existing on Site, it is therefore considered that this element of the proposals will seamlessly integrate within the Site. The tennis court and associated loggia will comfortably assimilate into the Site during to being low rise and of open-air construction. It is therefore concluded that the proposals are consistent and in accordance with Local Plan Policy 37, London Plan Policy D4, and Paragraph 126 of the NPPF.

## 5.5 RESIDENTIAL AMENITY

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- 5.5.1 As highlighted above, Policy 37 of the Local Plan is clear that proposals are expected to respect the amenity of neighbouring and future occupiers. The Policy adds that development should provide health environments and ensure they are not harmed by noise, disturbance, inadequate daylight, sunlight, privacy or by overshadowing. This is developed further by London Plan Policy D3, which notes that development should deliver appropriate outlook, privacy, and amenity. NPPF Paragraph 130 states that Planning Policy and decisions should ensure developments create places that are safe, inclusive, accessible, and which offer a high standard of amenity for existing and future users.
- 5.5.2 Within the area surrounding the Site, it is noted that the character is predominantly urban and residential, where outdoor recreational activity is commonplace. A large number of external tennis courts and swimming pools are visible in the immediate vicinity. The north, east, and west Site boundary benefits from dense vegetated buffers that screen the Site.
- 5.5.3 It is not envisaged that any element of the development will give rise to amenity concerns, by virtue of the garage building and kitchen garden with greenhouse already being in situ. It is noted that the proposed tennis court and loggia is approximately 65 metres from the closest 'lived in' building, however, the Site benefits from a dense buffer of mature vegetation and trees which is approximately 9 metres in width, which wholly screens the tennis court and loggia.
- 5.5.4 In view of this, it is noted that the development will generally not give rise to any noise impacts, whilst the loggia is designed to be open aired, it only comprises of a drinks store and some seating, so the use of this is not envisaged to materially impact the amenity of neighbouring occupants. It is reiterated that the kitchen garden, greenhouse, and garage building are already in situ and therefore it is not considered that the proposed development will give rise to any material amenity impacts over the existing situation.
- 5.5.5 It is therefore concluded that by virtue of the scale and use of the tennis courts and associated loggia, alongside the redevelopment of the existing facilities, in combination with the surrounding extant outdoor recreational uses in the area and the development's location within a well screened section of the Site that the development will provide more than adequate levels of amenity for both future and neighbouring occupants. It is submitted that the proposals will not require

external lighting. Given the above, it is considered that the development complies entirely with the requirements of Policy 37 of the Local Plan, Policy D3 of the London Plan, and NPPF Paragraph 130.

## 5.6 LANDSCAPING, TREES, AND ECOLOGY

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### Landscape

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- 5.6.1 As shown in the submitted landscape plans, the Site will benefit from a number of landscape improvements as part of the development of the grounds at Cookham Dene. In view of this, it is noted that the full landscaping details and specification can be secured through an appropriately worded condition.

### Trees

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- 5.6.2 Policy 73 of the Local Plan is clear that proposals for new development will be required to take account of existing trees on the site and adjoining land as the interests of visual amenity and / or wildlife habitat are considered desirable to be retained. London Plan Policy G7 supports this, noting that development proposals should ensure that the existing trees of value are retained wherever possible. The Policy continues to note that where permission is granted that necessitates the removal of trees and adequate replacement based on the existing value of the removed trees should be sought. This is furthered by NPPF Paragraph 131 which is clear that trees make an important contribution to the character and quality or urban environments, take opportunities to incorporate trees in the development and provide appropriate measures to secure the long-term maintenance of newly planted trees, retaining existing trees where possible.
- 5.6.3 In light of this, Marcus Foster Arboricultural Design & Consultancy were instructed to undertake a Tree Survey (May 2023) and an Arboricultural Survey Impact Assessment & Method Statement Report (September 2023), which has been submitted in support of this application.
- 5.6.4 The Arboricultural Survey Impact Assessment & Method Statement Report summarises the cumulative impact of the entire Site which is as follows:
- All 'A' category trees retained;
  - 5no. 'B' category trees removed;
  - Removal of 12no. 'C' category trees, 1no. 'C' category group, and partial removal of 1no. hedge;
  - Potential damage and compaction to retained trees by virtue of development and landscape processes;

- Potential damage to the canopies of retained trees surrounding the Site throughout development and landscape processes;
- Storage and use of materials and chemicals on Site in close proximity to trees;
- Development impacts on trees by virtue of changed usage of the Site and the future occupancy; and
- Replacement tree planting strategy.

5.6.5 In regard to the replacement garage, it is proposed that 1no. 'B' category tree is removed (i.e., T47 – London plane) to facilitate development, which will be required to be mitigated. In terms of the proposed kitchen garden, greenhouse, and associated store, it is proposed that 1no. 'C' category tree is removed (i.e., T60 – Apple) to facilitate development. The proposed tennis court and associated loggia will result in the removal of 5no. trees, all of which are assessed as being 'C' category trees (i.e., T72, T73, T76, T77, and T78 – Plum), which should not constrain development. No elements of the development as proposed will result in the Root Protection Area (RPA) of trees being incurred.

5.6.6 By virtue of the minimal impacts of the proposed development and the tree loss largely comprising 'C' category trees, it is considered that the proposals result in a very limited arboricultural impact, it is added that no trees subject to a Tree Preservation Order (TPO) will be impacted.

5.6.7 Given this, it is considered that the proposed development is entirely in accordance with Policy 73 of the Local Plan, Policy G7 of the London Plan, and NPPF Paragraph 131.

## Ecology

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5.6.8 Policy 79 of the Local Plan is clear that the Council will assist ecological restoration and enhance biodiversity across the Borough through the Mayor's Biodiversity Strategy to help address deficiency in access to nature. This is underpinned by London Plan Policy G6 which states that the impact on biodiversity should be managed by developments alongside aiming to secure a net biodiversity gain, which will be addressed from the outset using the best available ecological information. This is furthered by NPPF Paragraph 174, which is clear that planning policies and decisions should contribute to and enhance the natural and local environment.

5.6.9 In light of this, KB Ecology were instructed to undertake a Preliminary Ecological Assessment (PEA) (April 2023) which has been submitted in support of this application. Whilst only relevant to the redevelopment of the garage building, it is noted that as a result of the recommendations of the PEA, a Bat Survey Report (August 2023) was also undertaken by KB Ecology.

- 5.6.10 The PEA classifies the habitats present on Site, notes the potential of the Site and surroundings to support protected species. It then recommends suitable surveys, assesses the likely significance of ecological impact, and where appropriate suggests ecological enhancements.
- 5.6.11 In view of Designated Nature Conservation Sites, the PEA is clear that the Site is not a part of, nor directly adjacent to any statutory designated site, nor are any located within 1 kilometre of the Site.
- 5.6.12 In regard to habitats on Site, the PEA is clear that the Site is listed under the Traditional Orchard Survey Map 'LOND0480' as being 0.457 hectares in size, however, historic aerial photography from 1940 shows that this orchard is smaller, with trees only present over 0.2 hectares. The PEA states that the inventory has the incorrect extent of the traditional orchard, however, the areas east of the vegetable beds and north of the garages is still classified as traditional orchard and is therefore a 'Priority Habitat', with the PEA noting that trees in this location have suitability for roosting bats.
- 5.6.13 In terms of amphibians, the PEA is clear that no ponds are present on Site or within 100 metres of the Site. Within 250 metres, four ponds are located within woodland, one being located 230 metres southwest and a cluster of three 200 metres southeast (on the other side of St Paul's Cray Road). By virtue of the distance to the nearest pond, the PEA highlights that it is unlikely that Great Crested Newts are present on Site. However, there is potential for toads to be present in the woodland during their terrestrial phase of life.
- 5.6.14 The PEA considers reptiles, highlighting that a slow worm (located 0.1 kilometres to the east at St Paul's Cray Common). The grassland on Site, due to being heavily managed and kept at a short sward without a thatch layer, it is species poor and considered unsuitable for common reptile species due to the lack of foraging opportunities and cover from predators. However, the PEA notes that a small number of reptiles could be present in and near the earth bund in the northeast corner of the Site, if present, reptiles may hibernate under tree and hedge roots.
- 5.6.15 In terms of birds, the PEA considers that there is high potential for breeding birds within trees and hedges. The PEA notes additional features of gaps within soffits or under hanging tiles on buildings, albeit the proposed tennis court and loggia, alongside the kitchen garden, greenhouse, and associated store are not in close proximity to these features. No signs of barn owls were found during the survey.
- 5.6.16 The PEA highlights that the small woodland to the south and boundary trees have potential to support hazel dormouse due to the connection to suitable woodlands, some of which are ancient woodland, and the known presence of hazel dormouse nearby. Notwithstanding this, due to the very small size of suitable habitat, it would only be part of an individual dormouse's range.
- 5.6.17 In terms of badgers, no signs of badgers or setts were identified during the survey.

- 5.6.18 The PEA is clear that no bats or signs of bats were found in the internal or external inspection of the buildings. The main house has a very restricted roof space due to many of the roof spaces being converted. The PEA is clear that there are gaps into the soffit boxes with the roof being covered in clay tiles and first floor walls being covered in clay hanging tiles which provide high suitability for crevice-dwelling roosting bats. The PEA continues to note that the coach house / annex does not have any unconverted roof space, but the roof offers high suitability for roosting bats due to its clay tiled roof. The existing garage features Redland concrete roof tiles which do not generally offer gaps to bats, but some tiles are missing, which provides low suitability for roosting bats. A number of fruit trees offer medium to high suitability for roosting bats due to the presence of cavities within the trunks and branches, however only woodlice, snails, and slugs were identified during a thorough endoscope inspection which found no signs of bats. The PEA notes that the Site is likely to be used by foraging and commuting bats and should any of the roof tiles of the garage be impacted, one survey between May and August should be undertaken between May and August to check for the presence of roosting bats. The Bat Survey Report is clear that the garage building is not considered as being used as a bat roost and no mitigation or license is expected to be needed prior to the alterations.
- 5.6.19 The PEA notes that in terms of other species, the surroundings have potential to support hedgehogs and stag beetles.
- 5.6.20 The PEA notes that the proposal is not judged as being detrimental to any protected Sites. In considering the ecological mitigation of the Site, the PEA is clear that the retained trees should be protected during construction work, with the fruit trees remaining untouched and the use and management of the 'traditional orchard' continued. The development is not expected to impact on Great Crested Newts and therefore no further work is recommended. No impact is expected onto reptiles by virtue of the earth bund remaining unchanged. Due to the Site containing suitable habitats, the effects on birds can be avoided through undertaking vegetation clearance and building works outside of the nesting season (March to August inclusive) or after a survey has confirmed the absence of nesting birds, it is noted that a breeding bird survey is not necessary. A small number of trees (i.e., 7no.) comprising of Apple, London plane, and plum will be lost to the proposed development, but these will not affect the potential for hazel dormouse. The PEA highlights no impact is expected on badgers and therefore no further work is recommended, however as setts can fluctuate a pre-commencement badger survey is recommended if works take place more than one year after the date of the Site visit in the PEA. In view of hedgehogs, areas where mammals could be sheltering should be hand searched prior to disturbance, with excavations backfilled, covered overnight, or with ramps placed in to allow animals to escape. The PEA is clear that none of the trees with suitability for roosting bats are to be impacted.
- 5.6.21 The PEA highlights the ecological enhancements that should be incorporated into the development where possible.



- 5.6.22 In view of this, it is noted that the proposed development is entirely in accordance with Local Plan Policy 79, Policy G6 of the London Plan, and Paragraph 174 of the NPPF.

## 5.7 HIGHWAYS AND ACCESS

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- 5.7.1 It is noted that the Site access will remain unchanged from the existing situation, in addition to this, it is considered that the development proposed, by virtue of being a householder application, would not generate additional vehicle trips nor result in demonstrable impacts on the capacity, amenity, or operation on the Local Highway. Neither would the development result in a severe impact on the Local Highway Network in line with NPPF Paragraph 111.

## 5.8 FLOOD RISK

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- 5.8.1 As highlighted previously, by virtue of the Site being located entirely within Flood Zone 1, it is at the lowest level risk of flooding. It is highlighted that whilst the wider development at Cookham Dene is set over approximately 1.56 hectares and usually required to be supported by a Flood Risk Assessment, the development area itself is approximately 0.24 hectares. In light of this, it is considered that the application is not required to be supported by a Flood Risk Assessment.



## 6 SUMMARY AND CONCLUSION

### 6.1 SUMMARY

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- 6.1.1 This Statement has been prepared by DHA Planning on behalf of the applicant, Matt Benaron, in support of a Householder Planning Application for the reconfiguration of the existing garage, demolition and replacement of existing hardstanding and greenhouse and erection of tennis court and loggia on the footprint of the demolished hardstanding at Cookham Dene, Cookham Dene Close, Chislehurst, BR7 5QD.
- 6.1.2 This Planning Statement has considered the Site planning history, relevant planning policies, and the developments locality within the Chislehurst Conservation Area, the Metropolitan Green Belt, and its proximity to the Grade II Listed Building 'Cookham Dene'.
- 6.1.3 This Statement has demonstrated that the reconfiguration of the existing garage, replacement of existing kitchen garden and greenhouse with the development of associated store alongside the development of a tennis court and loggia is entirely compatible with the Site and its location within the Metropolitan Green Belt and the Chislehurst Conservation Area. The development has been sensitively designed to ensure that it preserves the openness of the Green Belt and respects the surrounding area whilst serving the main dwelling as individual, detached, ancillary structures. It is highlighted that the proposed development emulates the architectural styling, materials, and details of Cookham Dene, and it is modest in scale, complementing and enhancing Cookham Dene and the Chislehurst Conservation Area. The development is located in a non-intrusive and well compartmentalised area within the Site.
- 6.1.4 It is reiterated that by virtue of the proposals reconfiguring an existing modern garage building, the garage is not curtilage listed and therefore a Listed Building Consent application is not required.
- 6.1.5 The development is entirely compatible with the neighbouring residential uses, with the proposals not resulting in any adverse impacts on residential amenity, heritage, the Green Belt, trees, biodiversity, flood risk, or highways. It is also reiterated that both the garage and kitchen garden with greenhouse are already in situ on Site. It is therefore noted that the development is entirely consistent with the objectives of the NPPF in achieving sustainable development.

### 6.2 CONCLUSION

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- 6.2.1 The development comprises a sensitive, high-quality, well-informed, and well-planned development proposal. The Statement has demonstrated that the relevant policies in the Development Plan, comprising policies from the Bromley

Local Plan, the London Plan, the NPPF, and relevant Supplementary Planning Documents support the proposed development.

- 6.2.2 Therefore, for the reasons as set out within this Statement, it is noted that the development accords with the relevant Local, Regional, and National Planning Policy, and as a result are entirely acceptable. It is therefore respectfully requested that Planning Permission is granted.