

Planning & Heritage Statement

(including Design & Access and Flood Risk Considerations)

45 Heathfield Road, Keston, BR2 6BG

February 2024

PD Planning UK Ltd, 2024

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1. Introduction

- 1.1. This Statement is written to support a householder Planning Application for alterations and the erection of a single storey side extension to the side of the rear return. In conjunction with the submitted drawings, this Statement provides the background and rationale to the proposal and a consideration of relevant heritage matters to demonstrate that the development is appropriate to the building and its context.

2. The Site, Historic Description and Context

- 2.1. The property is an early Edwardian, two-storey, semi-detached house sited on the north-eastern side of Heathfield Road.



*Figure 1 - Aerial view of the site looking northwards
(Google Maps)*

- 2.2. The building is of brick construction with a rendered first floor, and a hipped, tiled roof form with prominent chimney features. The house is paired with No.43 to the north, being "halls adjoining" with centrally positioned front doors and porches. To the rear, the houses were constructed with a substantial shared "rear return", inset from the outer edges of the main building by approximately 2m. To the side of the return there is a single storey addition with monopitch tiled roof providing a side/garden entrance porch and wc.
- 2.3. The front garden is hardsurfaced with a hedge and fence along the front boundary, and a dropped kerb and vehicular access to the southern side of the house. There is a vehicular width drive adjacent to the southern side of the house that leads to a detached, pre-fabricated garage in the rear garden.
- 2.4. Beyond the patio at the rear of the house the rear garden is laid to lawn with trees and shrubs around the edges. Rear garden boundaries are defined by close boarded fences.



Figure 2 - Front, side and rear elevations

- 2.5. The surrounding area is residential in character, comprising detached and semi-detached two storey houses of varying forms. The architectural qualities and material palette is consistent with the growth of the village from the early 1900's, comprising traditionally styled buildings of brick and render construction with pitched tiled roofs.
- 2.6. No.47 to the south of the application site is a rendered cottage style dwelling with side gable adjacent to the application property. It has been extended from its original form.



Figure 3 - No.45 and No.47 Heathfield Road

- 2.7. The property is within the Keston Village Conservation Area and within the Tier 3 Archaeological Priority Area of Holwood/Warbank, Keston. It is not a Listed Building and there are no statutory Listed Buildings in the vicinity of the site that will be affected by this proposal.
- 2.8. The Keston Village Conservation Area (KVCA) was designated in 1989, following the linear form of development along Heathfield Road and Commonside that forms the historic village.

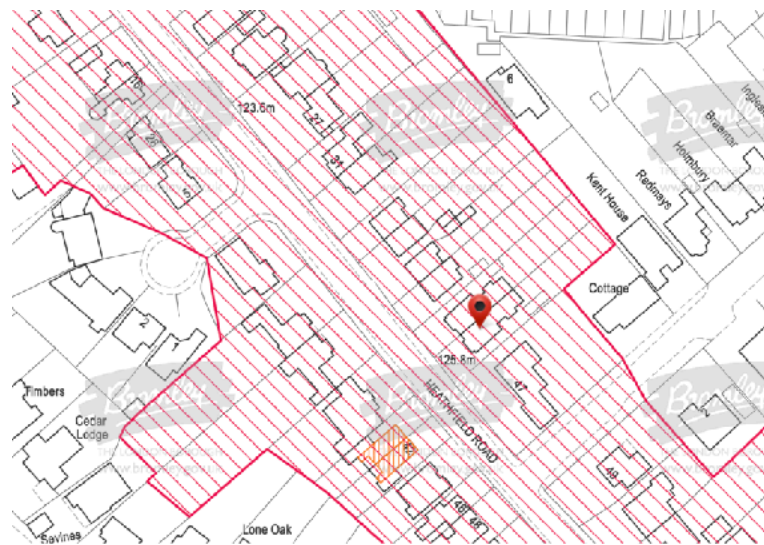


Figure 4 - The site within the Keston Village Conservation Area (LB Bromley interactive planning map)

2.9. It is evident from the OS Maps below that the property was constructed in the early 1900's as part of the growth of the Village at that time.



Figure 5 - 1898 and 1910 OS Survey Maps (National Library of Scotland)

3. Relevant Planning History

3.1. There is no planning history relating to this property.

4. The Proposal

4.1. The application seeks planning permission for alterations and the erection of a single storey side extension to the side of the rear return, replacing and enlarging the existing side entrance.

- 4.2. Details are shown on the accompanying drawings and supporting documentation.
- 4.3. To the side of the rear return, the existing single storey wc addition and side entrance porch will be replaced with a new single storey side extension. The new extension will be 1.93m wide, aligning with the southern flank wall of the main part of the house. It will be 4.9m long with a pitched tiled roof rising from 3.2m at eaves level up to 4m where it adjoins the house.
- 4.4. The extension will be constructed of brick and roof tiles to match the existing house. Two obscure glazed, white-painted, timber-framed windows will be inserted into the side elevation of the extension and a door will be provided within the rear elevation facing back towards the house.
- 4.5. The extension will allow for a ground floor wc and utility room to meet the needs of the family occupants.
- 4.6. The existing fenestration to the rear of the rear return at ground floor level is to be replaced with new French doors and side panels. These works are permitted development comprising the improvement or other alteration of a dwellinghouse, permitted by Schedule 2, Part 1, Class A of the 2015 General Permitted Development Order (as amended).

5. Heritage Considerations

Heritage Legislation, Policy and Guidance

- 5.1. Part 16 of the 2023 National Planning Policy Framework (NPPF) ¹ requires heritage assets to be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Paragraph 200 requires an applicant to *"describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*
- 5.2. NPPF Paragraph 205 states *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance"*.
- 5.3. NPPF Paragraph 208 confirms 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."*

¹ NPPF as updated 19th December 2023 in response to the Levelling-up and Regeneration Bill

- 5.4. The 2021 London Plan Policy HC1 requires development proposals affecting heritage assets and their settings to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. The policy also seeks to avoid harm to assets of archaeological significance.
- 5.5. A similar approach to heritage assets is confirmed in the 2019 LB Bromley Local Plan (BLP). BLP Policy 41 confirms that development must preserve or enhance the character or appearance of Conservation Areas and their settings, and BLP Policy 46 considers the impact of development on scheduled monuments and archaeology.

Historic Context

- 5.6. The site description above considers the site in its current context, and its historic and architectural significance. The relevant heritage assets for the purpose of this application are the Keston Village Conservation Area and the Holwood/Warbank Archaeological Priority Area.

Assessment of Significance

- 5.7. English Heritage's 2008 "Conservation Principles" confirm that there are four main categories of significance of heritage assets:
- 🏛️ Exceptional – an asset important at the highest national or international levels, including scheduled ancient monuments, Grade I and II* Listed buildings and World Heritage Sites.
 - 🏛️ High – a designated asset important at a national level, including Grade II listed buildings and locally designated conservation areas. The NPPF advises that substantial harm should be exceptional.
 - 🏛️ Medium – an undesignated asset important at local to regional level, including buildings on a Local List (non-statutory) or those that make a positive contribution to a conservation area. This may also include less significant parts of listed buildings.
 - 🏛️ Low – structures or features of very limited heritage value and not defined as a heritage asset. Includes buildings that do not contribute positively to a conservation area and also later additions to listed buildings of much less value.
- 5.8. On this basis, the heritage assets relating to the proposal can be considered to be of medium-low significance. The significance is derived from the external appearance of the house and the contribution that it makes to the streetscene and the Conservation Area. However, the rear parts of the building are of considerably less significance because they are not visible from the street and they have little impact on the character of the Conservation Area.

The Impact on the Conservation Area

- 5.9. The extension is modest in nature and it will remain subordinate to the house. It will partly replace an existing structure and it will not protrude beyond the side elevation of the front

part of the house. It will not be particularly visible from the public domain, but where it can be seen it will be against the backdrop of the substantial parts of the house. It will have no effect on the streetscene, and it will not harm the historic significance of the building.

- 5.10. The design and form of the extension is perfectly acceptable for the house, with careful choice of external materials to ensure that it integrates into and complements the existing building. The fenestration will complement the existing, recently replaced fenestration throughout the rest of the house, retaining its Edwardian character.
- 5.11. There are also clear benefits arising from the proposal in that it will allow for improvements to the security of the building. Thermal and energy efficiencies will also be achieved, with a reduction in carbon emissions and fuel bills, and improved comfort levels for the occupants. It is an appropriate form of development to suit the needs of the occupants and allow them to remain living in a property that they love.

The Impact on the Holwood/Warbank Archaeological Priority Area

- 5.12. The Holwood/Warbank Archaeological Priority Area (APA) is a Tier 3 APA, designated for the possibility of pre-historic, roman and medieval finds.
- 5.13. Historic England’s Archaeological Risk Model confirms that householder developments within Tier 3 areas are likely to have a negligible risk on archaeology. This means that such developments only rarely cause harm to heritage assets of archaeological interest and hardly ever cause significant harm.

Archaeological risk model	Outside APA	Archaeological Priority Area		
	Tier 4	Tier 3	Tier 2	Tier 1
4 Large Major Site area 2 hectares or more	Medium*	High	High	High
3 Major Site area 0.5 to 2 hectares	Low	Medium	Medium	High
2 Minor Site area less than 0.5 hectares New basements	Negligible	Low	Medium	High
1 Very minor Householder developments** and equivalent minor works	Negligible	Negligible	Negligible	Medium

* Very large majors with a site area of 10 hectares or more

** Other than new or extended basements

Figure 6 - Historic England’s Archaeological Risk Model

- 5.14. Development activities which may impact upon archaeology matters include excavation, ground disturbance and ground compaction, access, surfacing, service installation and landscaping measures. These activities could lead to the permanent, complete or partial loss of an archaeological feature or deposit. However, with regard to the potential archaeological impact of this proposal, the works are very minor in nature, replacing an existing structure adjacent to the house on already disturbed ground. The foundations of the extension will not extend below existing natural ground levels to any significant extent,

and the likelihood of pre-historic, roman or medieval finds is extremely unlikely. Even if any remains were to be found, they would most likely be of local significance in the context of the Secretary of State's non-statutory criteria for Scheduled Monuments.

- 5.15. No archaeological mitigation measures are therefore necessary for this very minor, negligible impact development.

Conclusion on Heritage Impact

- 5.16. Having considered the nature of the proposal in the context of the significance of the heritage assets, it is concluded that no harm will be caused to their significance. The proposal will preserve the special architectural and historic interest of the Conservation Area and there are no Archaeological implications arising. There are therefore no heritage reasons why planning permission cannot be granted.

6. Main Planning Considerations

- 6.1. Aside from the heritage impact, other planning considerations are addressed below in the context of the 2023 National Planning Policy Framework (NPPF), the 2021 London Plan (LP), and the 2019 Bromley Local Plan (BLP).

Siting, Design and Appearance

- 6.2. NPPF Section 12 and LP Policies D3 and D4 emphasise the need for high quality design to contribute positively to local character. BLP Policies P37 and P41 require development to be of a high quality and to respect the character and appearance of existing areas.
- 6.3. The extension will not be particularly visible from the street. It is modest in its scale and form and its design is perfectly acceptable for the house, with careful choice of external materials to ensure that it will integrate into and complement the existing building. The fenestration will match the existing, recently replaced fenestration throughout the rest of the house, retaining its Edwardian character. Consequently it is envisaged that the extension will be indistinguishable as a new addition, retaining the historic charm of the building.
- 6.4. There are therefore no design or appearance concerns arising from this proposal.

The Impact on Neighbouring Properties

- 6.5. NPPF Paragraph 191 states that new development should be appropriate for its location and take into account the likely effects of pollution on health and living conditions. BLP Policy 37 (e) seeks to protect the amenity of the occupiers of adjoining buildings, and to not result in direct overlooking of habitable rooms or private outdoor space, or result in any significant loss of sunlight or daylight.
- 6.6. The flank wall of the nearest neighbour at No.47 does not have any side facing windows to habitable rooms, and it is positioned away from the shared boundary by a 4m wide

driveway. The driveway within the application property also ensures that there is sufficient distance between properties to ensure that there extension does not have any adverse impact on the amenities of No.47.

- 6.7. Nevertheless, the modest extension is single storey, replacing the existing side entrance porch and windows. The side facing windows will be fitted with obscure glazing and the proposal will not therefore have any adverse impact on the amenities of adjoining occupiers.

Parking, Servicing and Highway Safety

- 6.8. The extension is at the rear of the property and will retain the side access to the rear garden and garage. It will not have any impact on or affect matters relating to parking, servicing and highway safety.

Flood Risk and Sustainable Drainage

- 6.9. NPPF Paragraphs 173-175 refer to flood risk and the need to ensure development is not placed in areas at risk of flooding, and that new development does not increase flood risk elsewhere. BLP Policies 115 and 116 seek to ensure flood risk management and the use of sustainable urban drainage systems (SUDS).
- 6.10. The site is within a Flood Zone 1² with a very low probability of flooding and a less than a 1 in 1000 annual probability of flooding occurring from the sea or a river. A property within a Flood Zone 1 area is suitable for residential use and for extensions to existing residential properties.
- 6.11. The Environment Agency’s Surface Water Flood (SWF) Map confirms that the property is also at very low risk of flooding from surface water, with a 1% chance (per year) of flooding from surface water as a result of heavy or prolonged rainfall.

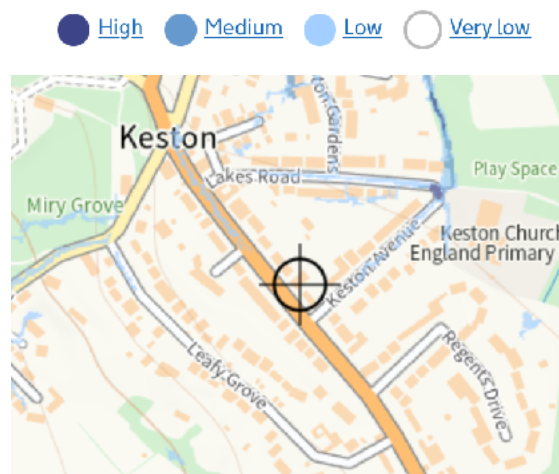


Figure 7 - Extent of flood risk from surface water (Environment Agency Flood Risk Map)

² Environment Agency Flood Map for Planning 2024

- 6.12. The surrounding road network can be subject to some surface water flooding, but the flood depth or velocity of the water is not excessive. In any case surface water flooding is likely to be short-lived given the adequate drainage systems that exist within the vicinity.
- 6.13. NPPF Guidance ³ confirms that minor developments are unlikely to raise significant flood risk issues unless they would:
- 💧 have an adverse effect on a watercourse, floodplain or its flood defences;
 - 💧 would impede access to flood defence and management facilities; or
 - 💧 where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.
- 6.14. This proposal will not give rise to significant flood issues. It is a minor residential extension that will feed into the existing drainage system, constructed to minimise flood risk in accordance with the requirements of Part H of the Building Regulations (Drainage and Waste Disposal).
- 6.15. The flood risk to the application site and the neighbouring properties will not increase as a result of the development and no specific mitigation measures are required. The development will comply with the flood risk and drainage requirements of national and local planning policies.

Sustainability and Energy Efficiency

- 6.16. NPPF Section 14 identifies how the planning system can support the transition to a low carbon future. LP Chapter 9 includes a number of policies and guidance relating to climate change and sustainable development. This includes LP Policy SI1 relating to improving air quality, LP Policy SI2 that seeks to minimise greenhouse gas emissions, LP Policy SI5 to minimise water usage, and LP Policy SI7 to reduce waste and support the circular economy. LP Policy SI2 seeks to ensure flood risk management and LP Policy SI13 relates to sustainable drainage. BLP Policies 122, 123, and 124 further re-enforce the Council's similar approach to the environment and climate change, promoting sustainable design and construction, reducing water consumption, maximising energy efficiency and managing heat gain and cooling.
- 6.17. The development will be constructed in accordance with these environmental and sustainability objectives. This will include the sourcing of appropriate construction materials and sustainable construction techniques using circular economy principles. The construction will require appropriate insulation measures and electrical/plumbing installations in accordance with the current Building Regulations.
- 6.18. The provision of improved services and insulation will therefore be in accordance with these environmental objectives and will ensure the continued residential, sustainable use of the building for generations to come.

³ Technical Guidance to the National Planning Policy Framework (March 2012), Paragraph 10.

Air Quality

- 6.19. NPPF Paragraphs 109, 180 and 192 support the need to improve air quality. LP Policy SI1 seeks to ensure that new development is air quality neutral meaning that development should not contribute to air pollution beyond allowable benchmarks. BLP Policy 120 also considers the impact of development on air quality.
- 6.20. The LP Air Quality Neutral Guidance (February 2023) confirms that developments that do not include additional emissions sources are assumed to be Air Quality Neutral and to meet the Air Quality Neutral benchmarks. Accordingly in such cases there is no need to provide an Air Quality Neutral Assessment to consider Building Emissions and Transport Emissions arising from the development.
- 6.21. This proposal is a minor householder development and will not lead to an increase in motor vehicle movements, or include new combustion plant. As such the proposal will meet the criterion to constitute an "excluded development" and it is satisfactory in terms of its impact on maintaining air quality.

7. Conclusion

- 7.1. This Statement has been prepared in accordance with the planning and historic environment policies contained within the NPPF, the LP, and the BLP.
- 7.2. The design and appearance of the extension and associated works are appropriate to the building and the proposal will not have any adverse impact on the significance of the Conservation Area or Archaeological Priority Area. There will be no adverse impact on the amenities of the adjoining occupiers. There are no concerns relating to flood risk or parking and highway safety. It is a sustainable development for which planning permission should be granted.
- 7.3. Appropriate conditions can be imposed to ensure that all material planning considerations are satisfied. It is therefore respectfully requested that planning permission be granted.

end.