

PLANNING STATEMENT



THIRD-FLOOR EXTENSION TO PROVIDE NEW RESIDENTIAL UNITS AT ALEXANDER HOUSE, 106 PEMBROKE ROAD, RUSLIP, MIDDLESEX, HA4 8NW

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EXECUTIVE SUMMARY

- This Planning Statement accompanies an application for planning permission at Alexander House, 106 Pembroke Road, Ruislip, HA4 8NW for the *“Construction of a third-floor extension to provide 2x 1-bed units and 1x3-bed unit with removal of rear servicing flues and replacement external lift shaft”*.
- The Proposed Development comprises of 2x 1-bed units a 1x 3-bed unit. All units on the third-floor would adhere to relevant London Plan (2016) policy and Hillingdon’s development plan policies (**See: page 13**).
- The proposed roof extension will preserve the significance of the adjoining heritage asset at Windmill House (**See: page 11**).
- 3 allocated off-street car parking spaces will be provided at the Site at a ratio of 1 per dwelling, with remaining spaces reserved for the existing office use. The Proposed Development would therefore not adversely impact parking stress levels on surrounding roads (**See: page 15**).
- The Proposed Development positively responds to the Council’s adopted development plan policies pertaining to quality urban design and neighbourly development, whilst preserving or enhancing the significance of the adjacent heritage asset and consequently the presumption in favour of granting planning permission is met and planning permission should be granted without delay in accordance with paragraph 14 of the NPPF.

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CONTENTS

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION	2
2.0 SITE AND SURROUNDINGS	3
3.0 THE PROPOSED DEVELOPMENT	4
4.0 PLANNING HISTORY	5
Alexander House	5
69-83 Park Way	6
Windmill Public House	6
5.0 PLANNING POLICY	7
Hillingdon Local Plan: Part 1 – Strategic Policies (“HLP1”)	7
Hillingdon Local Plan: Part 2 - Development Management Policies (“HLP2”)	7
Draft New London Plan (“New London Plan”)	8
The London Plan (2016) (“London Plan”)	8
6.0 PLANNING ASSESSMENT	9
Principle of Development	9
Impact on the Grade II Listed Building and its setting	10
Quality, Design and Space Standards	12
Parking and Refuse	14
7.0 CONCLUSION	16

Appendix 1: Annotated Plan

1.0 INTRODUCTION

- 1.1.1 This Planning Statement ("**Statement**") accompanies an application for planning permission at Alexander House, 106 Pembroke Road, Ruislip, HA4 8NW ("**Site**") for the "**Proposed Development**":

"Construction of a third-floor extension to provide 2x 1-bed units and 1x3-bed unit with removal of rear servicing flues and replacement external lift shaft"

- 1.2 The application is submitted to the London Borough of Hillingdon ("**Council**") on behalf of Sixis Group Ltd under the Town and Country Planning Act 1990.
- 1.3 This Statement explains how the Proposed Development will provide new residential units and complies with the relevant national planning policy, the development plan and other material considerations.
- 1.4 This Statement should be read in conjunction with the following documents submitted:
- Application Form;
 - Existing and Proposed drawings (prepared by Claridge Architects dated January 2020);
 - Design and Access statement (prepared by Claridge Architects dated January 2020);
 - Parking Stress Survey Report (prepared by Alpha Parking dated 29th March 2019)
 - Heritage Impact Assessment (prepared by EDS Ltd reference edp4827_r003a)
 - CIL Form; and
 - Location Plan

2.0 SITE AND SURROUNDINGS

- 2.1 The Site is located in the north-east of the borough on a linear plot measuring approximately 0.072ha bounded by Pembroke Road to the north, a car park to the south, and to the east by the part 2-storey, part 3-storey mixed-use terrace at Victoria Road/Pembroke Road and to the west by the Grade II listed Windmill Hall.
- 2.2 Alexander House is a three-storey flat-roofed building of contemporary character. Its principal road-facing element is faced in extensive areas of glazing with brick flank walls. The building extends to considerable depth with a narrow middle portion facilitating internal access between the two square elements to the front and rear of the building. The building is clad in a mixture of brick and render, with a cluttered arrangement of fenestration along the building's western elevation.
- 2.3 The existing building contains office accommodation over three floors, with car parking to the west of the building in the inset between the northern and southern front and rear blocks, in addition to eight spaces to the west of Windmill Hall which is within the applicant's site ownership. Two commercial units have been retained on the ground floor which are in use as a cake shop, falling within an A1 (retail) Use and the D1 (non-residential institution) Use 'The Windmill Studio' which offers a mix of community uses including performing arts and healthcare.
- 2.4 The Site is located within the Ruislip Manor Minor Town Centre as designated in the Council's Local Plan Part 2 Development Management Policies (2015) but falls outside of the centre's primary and secondary shopping areas. The Site is also situated approximately 77m from the Ruislip Manor Way Conservation Area.
- 2.5 Ruislip Manor Underground Station lies approximately 150m to the south-east of the Site which is also served by a number of local bus services. The Site has a Public Transport Accessibility Level ("PTAL") of 4 (good) on a scale of 0 to 6b, where 1 is poor and 6b is excellent.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The Proposed Development relates to the construction of a new third-floor extension to Alexander House to provide three residential units. The three new units consist of 2x 1-bed units and a 1x 3-bed unit accessed via the existing stair access core and lift shaft of the building which will be extended upwards and linked by a covered walkway.
- 3.2 All of the proposed units on the third-floor are provided with private amenity space in the form of terraces with a green landscaped area is incorporated into the central section of the third-floor extension.
- 3.3 The Proposed Development also includes removal of the existing rear servicing flues on the western elevation of Alexander House which along with the new parapet wall of the third-floor extension will rationalise the western elevation of the building which is visible in the setting of the listed Windmill House.
- 3.4 Car and cycle parking and waste storage is provided on Site and would adhere to the relevant London and local plan standards.
- 3.5 A detailed assessment of how the Proposed Development conforms to the policies contained in the adopted development plan is contained within Section 6 of this Statement.

4.0 PLANNING HISTORY

4.1 The relevant planning history of the Site has been tabulated below.

Reference	Address	Description	Status
2016/3615	Alexander House, 106 Pembroke Road Ruislip	Change of use from offices (Use Class B1) to provide 23 x 1 bed self-contained flats (Use Class C3) (Prior Approval).	Appeal allowed. 15/08/2017
2016/2533	<i>Same as above</i>	Change of use from Use Class B1 (Offices) to Use Class C3 (Residential Units) to form 23 self-contained flats (Prior Approval).	Refused. 22/08/2016
2007/922	<i>Same as above</i>	Change of use of ground floor from class b1(a) (general office) to class d1 (non-residential institutions) for use as a physiotherapy clinic with associated fitness gymnasium.	Approved. 21/05/2007
2001/724	<i>Same as above</i>	Erection of a second-floor addition to an existing head office building	Approved. 03/07/2001
2008/502	Windmill Hall 106a Pembroke Road Ruislip	Use of premises as a dance and drama school (class d1).	Approved. 13/02/2008
2016/2531	69-83 Park Way & 1-11 Victoria Road Ruislip	Enlargement of the roof, including raising of the ridge and eaves height to provide new recessed third floor, erection of a third floor extension to the rear of Nos. 69 to 81 Park Way, including the installation of rooflights, rebuilding of chimneys and new emergency external stairs to the rear of No. 9 Victoria Road, to allow for the provision of 9 new flats.	Approved. 29/06/2016
2006/2632	Windmill P.H. Windmill Hill Ruislip	Redevelopment of site with a mixed use comprising thirty-nine residential units in two blocks with ground and lower ground parking, amenity space and access from west way and retail unit on ground floor facing Pembroke Road/Windmill Hill (involving demolition of public house)	Approved. 20/07/2007

Alexander House

4.2 Prior approval for the change of use of Alexander House from office (Use Class B1(a)) to 23x 1-bed residential units (Use Class C3) was allowed at appeal on 15 August 2017 (appeal ref. APP/R5510/W/17/3173994) ("**Approved Development**"). The Approved Development includes 13 parking spaces, 5 spaces of which are located to the east of the building and 8 spaces to the west adjacent to Windmill Hall. Prior to this, planning permission (ref. 10744/APP/2001/724) was granted in 2001 for a second-floor extension to the office building.

- 4.3 The two commercial units in Alexander House at ground floor level were also retained as part of the Approved Development.

69-83 Park Way

- 4.4 On the eastern side of Victoria Road and at nos. 69 to 71 Park Way, planning permission (ref. 72040/APP/2016/2531) was granted in May 2017 for the enlargement of the roof, including raising the ridge and eaves height to provide a new recessed floor and erection of a third floor extension to provide 9 new flats. This development provides local precedent of a similar nature to the Proposed Development and provides an example of a rooftop development to provide additional units as part of a mixed-use building which is located on a prominent corner plot at the heart of Ruislip Manor Town Centre.

Windmill Public House

- 4.5 Opposite the Site on the northern side of Pembroke Road is a Kwik Fit garage which is adjoined to the north and east by a mixed-use development that was granted planning permission in July 2007. That scheme comprises 39 residential units in two blocks. The two blocks in the 2007 scheme are both part three / part four storeys in height with the four storey elements sited away from West Way and Pembroke Road respectively. Parking is provided on-site at a ratio of 1 to 1.

5.0 PLANNING POLICY

5.1 In accordance with Section 38(6) of the Planning & Compulsory Purchase Act (2004), applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. Under Section 38(2), the development plan for any area within Greater London comprises the Spatial Development Strategy and the development plan documents (taken as a whole) which have been adopted and approved in relation to that area. The statutory development plan for the Borough comprises of the following:

- Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
- Hillingdon Local Plan: Part 2 – Development Management Policies (2019)
- Draft New London Plan 2018 (Intend to Publish version)
- The London Plan 2016

Hillingdon Local Plan: Part 1 – Strategic Policies (“HLP1”)

5.2 The HLP1 policies which are considered relevant to the Proposed Development are listed below:

H1 – ‘Housing Growth’

HE1 – ‘Heritage’

BE1 – ‘Built Environment’

SC3 – ‘Flood Risk and Drainage’

Hillingdon Local Plan: Part 2 - Development Management Policies (“HLP2”)

5.3 The HLP2 policies which are considered relevant to the Proposed Development are listed below:

DMH 2 – ‘Housing Mix’

DMHB 1 – ‘Heritage Assets’

DMHB 2 – ‘Listed Buildings’

DMHB 11 ‘Design of New Development’

DMHB 16 – ‘Housing Standards’

DMHB 17 – ‘Residential Density’

DMHB 18 – ‘Private Outdoor Amenity Space’

DMT 5 – ‘Pedestrians and cyclists’

DMT 6 – ‘Vehicle Parking’

Draft New London Plan (“New London Plan”)

5.4 The New London Plan Policies which are considered relevant to the Proposed Development are listed below:

D1 – ‘London’s form, character and capacity for growth’

D3 – ‘Optimising site capacity through the design-led approach’

D4 – ‘Delivering good design’

D6 – ‘Housing quality and standards’

H1 – ‘Increasing housing supply’

HC1 – ‘Heritage conservation and growth’

T5 – ‘Cycling’

T6.1 – ‘Residential parking’

The London Plan (2016) (“London Plan”)

5.5 The London Plan Policies which are considered relevant to the Proposed Development are listed below:

3.3 – ‘Increasing housing supply’

3.4 – ‘Optimising housing potential’

3.5 – ‘Quality and design of residential accommodation’

6.13 – ‘Parking’

7.6 – ‘Architecture’

7.8 – ‘Heritage assets and archaeology’

6.0 PLANNING ASSESSMENT

6.1 The main issues relating to the Proposed Development are:

- Principle of development and density
- Impact on the Grade II Listed Building and its setting
- Design of the development and the quality of accommodation
- Highways and refuse impacts

Principle of Development

London Plan

- 6.2 New London Plan Policies H1 ‘Increasing housing supply’ recognises that to ensure that Council’s ten-year targets are achieved, boroughs should *“encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period”*.
- 6.3 New London Plan D3 ‘Optimising site capacity through the design-led approach’ states that *“All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth”*.
- 6.4 New London Plan paragraph 3.6.1 states *“For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land. The design of the development must optimise site capacity. Optimising site capacity means ensuring that the development takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies”*.
- 6.5 Given the existing form of the host property at Alexander House it is considered that the floorplate of the Proposal has been designed to make optimum use of the building form and provide three high quality residential units on a brownfield windfall site which would contribute towards Council’s ascribed housing targets. The Site is located in an urban area with a PTAL rating of 4 and therefore provision of residential dwellings in this accessible location would be consistent with the aims and objectives of the New London Plan.

Hillingdon Local Plan

- 6.6 HLP1 Policy H1 'Housing Growth' states *"the council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan Policies"*.
- 6.7 Paragraph 6.23 states, *"the density of residential development should take account of the need to optimise the potential of sites compatible with local and historic context, while respecting the quality, character and amenity of surrounding uses"*.
- 6.8 In considering the provisions outlined in the London Plan and New London Plan, it is considered that the Proposed Development would provide a quantum of housing on a windfall site which would contribute to Hillingdon's ascribed need. The HLP1 recognises the importance of housing delivery from this source in contributing to the Borough's ascribed housing targets as outlined in HLP1 Policy H1.
- 6.9 The density of the Proposed Development is therefore supported by the HLP1, and emerging New London Plan.

Impact on the Grade II Listed Building and its setting

- 6.10 Windmill Hall is a Grade II Listed former air raid precautions building built in 1941 (Historic England list entry no. 1380172). It is an 'L-shaped' single storey building with a two-storey projecting tower in the north western corner of its plot.
- 6.11 The two-storey tower contains the former water tank and boiler for the building and is notable for having tall windows on its north face with flat semi-circular shaped concrete lintels above, with the corner chimney projecting and having three recessed channels. These elements contribute to the buildings reference of modernist Dutch architecture in its design.
- 6.12 Nonetheless, the significance of the building lies primarily in its historic interest as it represents the retention of one of a large number of gas decontamination centres which were set up at the outbreak of World War II. The utilitarian design and function of the air raid precautions building results in limited architectural, and no artistic or archaeological interest.
- 6.13 When considering the impact that the Proposed Development has on the setting of the Grade II listed Windmill Hall, the National Planning Policy Framework (2019) ("**NPPF**") Paragraphs 192, 193, 195 and 200 are particularly important. These state as follows:

- **Paragraph 192:** *“In determining planning applications, local planning authorities should take account of...the desirability of new development making a positive contribution to local character and distinctiveness.”*
- **Paragraph 193:** *“When considering the impact of the proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed through...development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”*
- **Paragraph 195:** *“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 securing its optimum viable use.”*
- **Paragraph 200:** *“Local planning authorities should look for opportunities for new development...within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance should be treated favourably.”*

6.14 New London Plan Policy HC1 ‘Heritage conservation and growth’ also states *“development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets significance and appreciation within their surroundings”*.

6.15 HLP1 Policy HE1 ‘Heritage’ confers that *“the Council will conserve and enhance Hillingdon’s distinct and varied environment, its settings and the wider historic landscape, which includes; designated heritage assets such as statutorily Listed Buildings”*. HLP2 further reinforces the principles of conservation and enhancement of the significance of heritage assets with HLP2 Policy DMHB 1 ‘Heritage Assets’ stating *“development that has an effect on heritage assets will only be supported where buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.”*

6.16 In support of the Proposed Development, its impact on the significance of the heritage asset is further explored in the Heritage Impact Assessment (“**HIA**”) prepared by EDP Ltd.

6.17 The HIA states that the existing building at 106 Pembroke Road currently makes a neutral contribution to the significance of the Grade II listed building, however the disjointed appearance

of the western elevation, with its inclusion of services and general untidy appearance, currently detracts from the experience of viewing the listed building.

- 6.18 The listed building derives most of its significance from its historic values whilst a limited amount of significance is derived from its prominence in the streetscape. In this regard the Proposed Development would not harm the heritage asset as it is commensurate in scale within the context and modern setting of the listed building. The articulation of the western elevation in removing the distracting clutter from the as existing elevation, will result in an enhanced experience of the listed building through the ability to appreciate its significance.
- 6.19 Therefore, in conclusion the HIA determines that the Proposed Development *“will not result in any change or harm to the significance of the listed building, which predominantly lies within its historic interest and, to a lesser extent, the architectural interest of its fabric. The assessment has identified that there will be an enhancement to the way in which the listed building is experienced, by improving the western elevation of Alexander House. As such, it is considered that the proposals should be seen to accord with the duty in Section 66 of the Planning (listed buildings and conservation areas) act of 1990 and the policies contained within the NPPF and local plan”*.

Quality, Design and Space Standards

Design

- 6.20 HLP2 Policy DMHB11 ‘Design of New Development’ outlines the Council’s overarching design principles for development including ensuring that the layout and appearance of development harmonises with the existing streetscene and/or other features of the area, safeguards the development potential of adjoining sites and harmonises with the scale, form and composition of the original building.
- 6.21 As outlined in the accompanying Design and Access Statement (“**DAS**”), a comprehensive design analysis incorporating massing, materiality and façade composition has been undertaken to inform the design of the Proposed Development and ensure it complements the architectural language of the locality including the adjacent Windmill Hall, in addition to harmonising with the scale and form of the existing property (see page 18 of the DAS prepared by Claridge Architects).
- 6.22 It is also considered that the Proposed Development would not fetter the development potential of adjoining sites to the east given their existing development constraints. The sole habitable room window which overlooks the east of the Site faces a side vehicle access which facilitates rear access and servicing to the ground and upper floor units of the adjoining mixed-use terrace and the ground

floor parking spaces at the Site. The vehicle access and rear courtyard is the subject of a private right of way which would preclude this space from being built on, as it is required by the landowner to remain unobstructed and identifiable (see area highlighted in **Appendix 1**). A number of windows along the eastern elevation of Alexander House also exist as part of the original building and would be assessed as such were any development to come forward on the adjoining site to the east.

6.23 It is therefore considered that the Proposed Development would not fetter the development potential of the adjoining site in adherence to HLP2 Policy DMHB11.

Quality and Space Standards

6.24 New London Plan Policy D6 'Housing quality and standards' states *"Housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose"*

6.25 HLP2 Policy DMHB 16 'Housing Standards' outlines the principles for housing development in the Borough which requires development to ensure it has *"an adequate provision of internal space in order to provide an appropriate living environment"*.

6.26 Underpinning the principles of the residential quality policies in the New London Plan and HLP2 are the minimum internal space standards as outlined in the Technical Housing Standards¹. A schedule of the dwelling sizes for the proposed new units on the third-floor roof extension are outlined below in Table 1 and as evidenced all proposed units on the third-floor would exceed the ascribed minimum standards.

Table 1: Proposed Dwelling Sizes

Unit	Required (sq.m.)	Proposal (sq.m.)	+/- (%)
Unit 24 (1b2p)	50	52	104
Unit 25 (1b2p)	50	52	104
Unit 26 (3b5p)	86	102	118

6.27 In addition, the Technical Housing Standards requires single rooms to have a minimum Gross Internal Area ("GIA") of 7.5sq.m, double rooms to have a GIA of 11.5sq.m and dwellings of two or

¹ Department of Communities and Local Government - Technical housing standards - nationally described space standards March 2015

more bedrooms to have at least one room of double size. All newly proposed dwellings would also adhere to these technical specifications.

6.28 With regards to private amenity space London Plan Housing Supplementary Planning Guidance (2016) (**"Housing SPG"**) Standard 26 'Private Open Space' states that *"a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant"*. Standard 27 continues that *"the minimum depth and width of all balconies and other private external spaces should be 1500mm"*.

6.29 The Proposed Development includes private amenity space for the new units on the third-floor which would adhere to the Housing SPG standards. A schedule of the private amenity provision for the third-floor units is included in Table 2.

Table 2: Private Amenity Provision

Unit	Required (sq.m.)	Proposal (sq.m.)	+/- (%)
Unit 24 (1b2p)	5	21	420
Unit 25 (1b2p)	5	21	420
Unit 26 (3b5p)	8	47	587

Parking and Refuse

Vehicle Parking

6.30 HLP2 Policy DMT 6 'Vehicle Parking' prescribes the maximum parking standards outlined in the Car Parking Standards Appendix C Table 1 which prescribes a maximum of between 1.0 to 1.5 spaces per unit for 1-2 bedroom dwellings and 2 spaces per unit for flats with 3-4 beds.

6.31 There is a clear strategic objective to reduce the provision of, and dependency upon car ownership, whilst promoting more sustainable modes of transport particularly in areas where there is good access to public transport.

6.32 The Site has a PTAL rating of 4, is located in close proximity to local bus services and Ruislip Manor Underground Station.

6.33 Emerging New London Plan Policy T6.1 'Residential Parking' sets out the maximum parking standards in Table 10.3 stating that outer London sites with a PTAL 4 should provide a maximum of 0.5 spaces per dwelling. The Proposed Development would provide three allocated on-site parking spaces for the proposed units which will be secured via a removable parking bollard. The

remaining parking spaces would be for the sole use of the existing office use on the lower floors of Alexander House.

- 6.34 It is therefore considered that the parking arrangements for the Proposed Development would have no adverse impact on highways conditions in the vicinity of the Site in accordance with HLP2 Policy DMT 6.

Cycle Parking

- 6.35 Table 10.2 of the New London Plan prescribes the minimum levels of cycle parking that should be provided at new development. Table 10.2 states that 1.5 cycle parking space should be provided for 2 person 1-bedroom dwellings and 2 spaces should be provided for all other dwellings.
- 6.36 The Proposed Development is therefore required to provide a minimum of 5 cycle storage spaces for the new units.
- 6.37 These 5 cycle storage spaces are to be provided alongside the existing 23 spaces at the site in a secured and sheltered location in line with the London Plan Housing SPG Standard 21 'Cycle storage'.

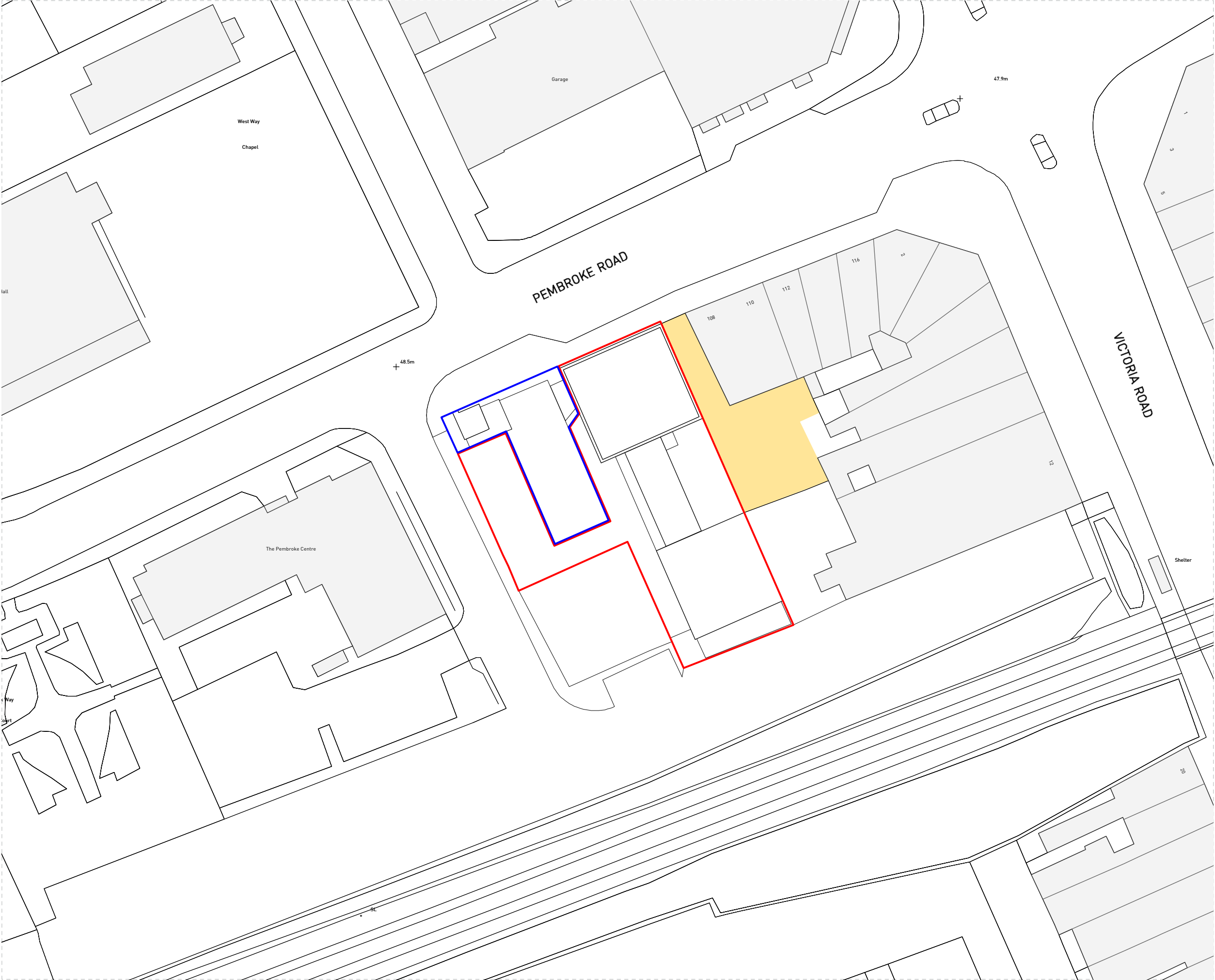
Refuse

- 6.38 HLP2 Policy DMHB 11 'Design of New Development' states that development should make, *"sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours"*. The Council's Design and Access Statement for Residential Layouts, outlines specific waste management criteria for new housing development. Paragraph 4.41 requires facilities to be *"easily and safely accessible and should not be farther than 23m from the highway /collection point and not farther than 9m for wheelie bins"*. Refuse is stored in a secured and sheltered bin store which is 13m from the highway, with a capacity of 3300L over 3x1100L Eurobins. It is therefore considered that there is sufficient provision for waste storage.

7.0 CONCLUSION

- 7.1 The Proposed Development is for “*Construction of a third-floor extension to provide 2x 1-bed units and 1x3-bed unit with removal of rear servicing flues and replacement external lift shaft*” which will facilitate three new dwellings at the Site on a new third-floor of the building.
- 7.2 The Proposed Development would also result in a rationalisation of western elevation of the existing building which is of low architectural merit, and which makes a negative contribution to its locality and the setting of the adjoining listed building.
- 7.3 The proposed third-floor dwellings will comply with minimum internal space standards and exceed the external amenity standards. The Proposed Development would therefore contribute to the Borough’s ascribed housing targets by providing a quantum of housing on a brownfield windfall site.
- 7.4 The Proposed Development positively responds to the Council’s adopted local plan policies pertaining to quality urban design and neighbourly development, would not adversely impact on the significance of the adjacent heritage asset and consequently the presumption in favour of granting planning permission is met and planning permission should be granted without delay in accordance with paragraph 14 of the NPPF.

Appendix 1: Annotated Plan



NOTES

Private right of way

0.02.55.010.0 m

CLARIDGEARCHITECTS

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PEMBROKE ROAD

CLIENT - SIXIS GROUP LTD

EXISTING SITE PLAN

STATUS - PLANNING

DRAWN	CHECKED	REVISION
SL	RB	-
SCALE	DRAWING	DATE
1:500 @ A3	18013_S.04	06.03.19