

Planning, Design & Access Statement

**In support of a planning application to add a Third
floor to create 9 apartments and alterations to car
parking, cycle and refuse storage**



**Site at
Malt House, 281 Field End Road,
Eastcote,
Middlesex
HA4 9XQ**

August 2019

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Allen Planning Ltd in support of a planning application to create a new third floor resulting in an additional 9 apartments together with some alterations to the car parking, cycle and refuse storage.
- 1.2 The site has recent prior approval consent, under Part O of the GPDO, for the conversion of this entire building from B1 (a) office use to form 47 residential apartments under LPA reference 23156/APP/2019/339.
- 1.3 The provisions of the GPDO relating to the change of use of office buildings to residential does not permit any external alterations to the building and in this respect an application has already been submitted for external changes to the building.
- 1.4 This application proposes a further floor of accommodation set back from the street frontages creating 9 further apartments and therefore if approved such would result in 56 apartments being created across the overall on the site.
- 1.5 Works are already progressing on site in terms of the permitted conversion of the host building to apartments following the grant of Prior Approval.
- 1.6 The purpose of this Statement is to describe the relevant site context and surrounding area together with the details of the proposed development. It also outlines the planning policy context and provides an assessment of those policies that apply to the scheme development.

2.0 Site Description

- 2.1 The site is located on the junction of Field End Road and Sunningdale Avenue. It is bound by Field End Road to the west, 269 Field End Road (Television House) to the north, 5 Sunningdale Avenue to the east and Sunningdale Avenue to the south.
- 2.2 The application site contains 281-285 Field End Road which has a private car parking area located at the rear of the building which was previously used by employees working in Malt House.
- 2.3 The site is located approximately 180m south of Eastcote Underground Station and there is a bus stop nearby which is served by the 282 and 398 on a frequent basis connecting the site to Southall, Greenford, Northolt, Eastcote, Northwood, Ruislip, South Harrow and Rayners Lane.
- 2.4 The PTAL score for the site is 3, which is moderate.
- 2.5 There is an open green space nearby at Cavendish Recreation Ground, approximately 210 metres to the south
- 2.6 The site is not within a Conservation Area and there are no nearby listed buildings.
- 2.7 The site occupies a prominent corner location with effectively two elevations to the principle highway through the settlement (Field End Road).

- 2.8 The context of the site is mixed in terms of use including residential flats and houses and also in the style, heights and design of local townscape.
- 2.9 The general location of the site is shown in Figure 1 below.



Figure 1 - The Site

3.0 Planning History

- 3.1 Prior Approval was recently granted for the conversion of this building to form 47 apartments under reference 23156/APP/2019/339.
- 3.2 In addition an application has been made to undertake external changes to the building which is as yet undetermined.
- 3.3 Previous to this planning permission was granted under reference 23156/APP/2017/4464 for the demolition of the existing building and replacement with 27 residential units (Class C3) comprising 24 flats and 3 houses.
- 3.4 This is important planning history in terms that it identifies that the LPA supported the principle of four storey development on this site with the approved elevation shown below.



4.0 Planning Policy

- 4.1 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004, the Development Plan is made up of the revised National Planning Policy Framework 2018, the London Plan 2016, the Local Plan Part 1 - Strategic Policies (adopted 2012) which sets out the overall level and broad locations of growth up to 2026 and the saved Policies of the UDP are also relevant.
- 4.2 The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and Policies Map and once adopted it will deliver the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies (2012). Together they will form a comprehensive development strategy for the borough up to 2026. The council submitted the Local Plan Part 2 to the Secretary of State on 18 May 2018.
- 4.3 These policies have limited weight given they have not undergone scrutiny of PINS

National Planning Policy Framework

- 4.4 The revised National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they are expected to be applied. Section 38 (6) requires that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework is a material consideration in planning decisions.
- 4.5 At the outset Paragraph 8 -10 of the NPPF advise:

“8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the*

needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

*10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable.**"*

4.6 **Paragraph 11** identifies the fundamental thrust of the guidance which states that Plans and decisions should apply a presumption in favour of sustainable development which for decision taking means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole

Housing

4.7 **Paragraph 68** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;

c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes

4.8 Paragraph 117 adds:

“117. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

Design

4.9 Turning now to matters of development design p124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.

4.10 It adds that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process

4.11 Paragraph 127 adds:

“Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

4.12 Furthermore Paragraph 130 advises that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

4.13 In addition paragraph 130 states:

“Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).”

4.14 Furthermore paragraph 131 adds:

“In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

4.15 Turning now to matters of car parking the revised NPPF in matters of sustainable development, transport and car parking advises at paragraph 105 that: -

“105. If setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”

4.16 Importantly Paragraph 109 of the Framework 2018 advises that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”

4.17 In terms of the use of parking standards paragraph 106 of the recently revised NPPF advises:

“106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). “

The London Plan.

4.18 The London Plan 2016 forms up to date Regional Spatial Strategy and seeks amongst other matters to increase the City's supply of housing.”

- 4.19 In **Policy 3.3** the Mayor “recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.” The policy states that The Mayor will: -

“seek to ensure the housing need identified in paragraphs 3.16a and 3.16b is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London¹ which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners”

- 4.20 **Policy 3.3 E** states that “Boroughs should seek to enable development capacity to be brought forward to meet these targets having regard to the other policies in this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:

- a. intensification (see policies 2.13, 3.4)*
- b. town centre renewal (see policy 2.15)*
- c. opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)*
- d. mixed use redevelopment, especially of surplus commercial capacity and surplus public land (see policies 2.7, 2.11, 4.2-4.4)*
- e. sensitive renewal of existing residential areas (see policies 3.4, 3.5, 3.14).*

The minimum 10 year target for new housing in the Borough as established at Table 3.1 is 15,988.

- 4.21 **Policy 3.4** deals with optimising housing potential taking into account matters such as local context and character, design principles and public transport capacity. The policy adds that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 and that development proposals which compromise this policy should be resisted.

- 4.22 **Policy 3.5** seeks housing developments to be of the highest quality internally, externally and in relation to their context and to the wider environment. The policy adds that the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people.

- 4.23 **Policy 3.8** seeks to achieve a genuine choice of homes that Londoners can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments

- 4.24 In terms of design **Policy 7.4** states:

“A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

B Buildings, streets and open spaces should provide a high quality design response that:

a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass

b contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area

c is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings

d allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area

e is informed by the surrounding historic environment.

LDF preparation

C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.”

4.25 And **Policy 7.6** adds:

Strategic

A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

Planning decisions

B Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

c comprise details and materials that complement, not necessarily replicate, the local architectural character

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

e incorporate best practice in resource management and climate change mitigation and adaptation

f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

g be adaptable to different activities and land uses, particularly at ground level

h meet the principles of inclusive design

i optimise the potential of sites

Hillingdon Policy

4.26 Turning to Hillingdon’s relevant policies The Local Plan Part 1 - Strategic Policies (adopted 2012) sets out the overall level and broad locations of growth up to 2026 and the saved Policies of the UDP are also relevant.

4.27 **Local Plan Part 1 Policy BE1** Built Environment states that “the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.”

The policy sets out a number of criteria that all new development should meet, including

“Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;

Be designed to be appropriate to the identity and context of Hillingdon’s buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties.”

- 4.28 **The Local Plan Part 2** comprises Development Management Policies, Site Allocations and Designations and Policies Map and once adopted it will deliver the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies (2012). Together they will form a comprehensive development strategy for the borough up to 2026. The council submitted the Local Plan Part 2 to the Secretary of State on 18 May 2018.

- 4.29 In terms of the UDP policies in terms of design and amenity the following extracts are relevant:

BE13 DEVELOPMENT WILL NOT BE PERMITTED IF THE LAYOUT AND APPEARANCE FAIL TO HARMONISE WITH THE EXISTING STREET SCENE OR OTHER FEATURES OF THE AREA WHICH THE LOCAL PLANNING AUTHORITY CONSIDERS IT DESIRABLE TO RETAIN OR ENHANCE.

BE14 PERMISSION WILL NOT BE GRANTED FOR THE DEVELOPMENT OF SITES IN ISOLATION IF THE DESIGN FAILS TO SAFEGUARD THE SATISFACTORY RE-DEVELOPMENT OF ADJOINING SITES WHICH HAVE DEVELOPMENT POTENTIAL.

BE15 PROPOSALS FOR ALTERATIONS AND EXTENSIONS TO EXISTING BUILDINGS WILL BE PERMITTED WHERE THEY HARMONISE WITH THE SCALE, FORM, ARCHITECTURAL COMPOSITION AND PROPORTIONS OF THE ORIGINAL BUILDING.

BE19 THE LOCAL PLANNING AUTHORITY WILL SEEK TO ENSURE THAT NEW DEVELOPMENT WITHIN RESIDENTIAL AREAS COMPLEMENTS OR IMPROVES THE AMENITY AND CHARACTER OF THE AREA.

BE20 BUILDINGS SHOULD BE LAID OUT SO THAT ADEQUATE DAYLIGHT AND SUNLIGHT CAN PENETRATE INTO AND BETWEEN THEM AND THE AMENITIES OF EXISTING HOUSES ARE SAFEGUARDED.

BE21 PLANNING PERMISSION WILL NOT BE GRANTED FOR NEW BUILDINGS OR EXTENSIONS WHICH BY REASON OF THEIR SITING, BULK AND PROXIMITY, WOULD RESULT IN A SIGNIFICANT LOSS OF RESIDENTIAL AMENITY.

BE22 RESIDENTIAL EXTENSIONS AND BUILDINGS OF TWO OR MORE STOREYS IN HEIGHT SHOULD BE SET BACK A MINIMUM OF 1 METRE (1.5 METRE IN THE COPSEWOOD AND GATE HILL FARM ESTATES, NORTHWOOD AND THE DRIVE, ICKENHAM) FROM THE SIDE BOUNDARY OF THE PROPERTY FOR THE FULL HEIGHT OF THE BUILDING

BE23 NEW RESIDENTIAL BUILDINGS OR EXTENSIONS SHOULD PROVIDE OR MAINTAIN EXTERNAL AMENITY SPACE WHICH IS SUFFICIENT TO PROTECT THE AMENITY OF THE OCCUPANTS OF THE PROPOSED AND SURROUNDING BUILDINGS, AND WHICH IS USABLE IN TERMS OF ITS SHAPE AND SITING.

BE24 THE DESIGN OF NEW BUILDINGS SHOULD PROTECT THE PRIVACY OF THE OCCUPIERS AND THEIR NEIGHBOURS.

5.0 Planning Assessment

Land Use

- 5.1 The application site is located within the urban area of Eastcote, as identified in the development plan, within which additional residential development on previously developed land is not only allowed in principle but is encouraged.
- 5.2 The revised NPPF also reinforces the policy presumption in favour of development in sustainable locations alongside the re-use of previously developed brownfield land which includes optimising development subject to site-specific policies and considerations.
- 5.3 In addition to this, a prior approval scheme for the conversion of the building into 47 residential flats is in place, and therefore the principle of a residential land use has already been established on the site.
- 5.4 Given such extant planning history there can be no objection in principle to the loss of “employment” floor space on this site.
- 5.5 The proposal thereby complies with relevant development plan policy in terms of land use.**

Design & Character

- 5.6 The NPPF at paragraph 124 confirms that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development is indivisible from good planning and should contribute positively to making places better for people.
- 5.7 In addition paragraph 130 states:
- “Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used*
- 5.8 The existing building has a general commercial style appearance and lies within an area displaying significant diversity in the height, uses and materials in the local area.
- 5.9 The area contains both large footprint commercial buildings and also a number of two storey dwellings and the application site is prominent in the street scene being a corner site.
- 5.10 The proposed development is for a roof top extension to the existing building at the above address. The scheme strives to maximise the development potential with the additional storey being built above the existing footprint.

- 5.11 The aim is to create a sustainable and appropriately designed development of new residential units in harmony with the existing building and surrounding built environment.
- 5.12 The proposal comprising of No. 9 flats, on the roof of the existing 'L' shaped Malt House. Its main elevation is along Field End Road and the other elevation is along Sunningdale Avenue.
- 5.13 The proposed roof extensions is set back from the street facing elevation [i.e. Field End Road. and Sunningdale Avenue]. This is aimed at reducing the bulk and mass on the existing building form the street frontages. This way, the extension appears subordinate to the existing brick building mass below.
- 5.14 This set back therefore creates the opportunity for ample amenity [terrace space] for the dwelling at the front of the building.
- 5.15 To the rear, the building faces an internal courtyard carparking space. Here the bulk and mass of the building is reduced by the elevation treatment. These are treated as open and ventilated walkway, allowing for open vertical tall balustrades along the length of the circulating corridors positioned along the rear perimeter of the building.
- 5.16 The material treatment to the roof is proposed as Aluminium panel cladding which is complementary to the brick building below.
- 5.17 Cycle storage will be provided to each dwelling within a dedicated cycle enclosure located within the secure carpark area at the rear of the site.

Scale

- 5.18 The proposed roof extension will be discrete and of an appropriate scale for the site and its location. The setback proposed ensure its visual impact and presences from the main street level is greatly reduced.
- 5.19 Also, setting the balustrades to the front facing terraces, back form the building parapet further ensures this extensions presence form the street frontage is significantly reduced.
- 5.20 The existing building will not be altered or affected by the proposed extension. he overall of height of the building, inclusive of the roof extension matches that of the previously approved new development on the same site.

Appearance

- 5.21 The concept is to create 9 contemporary additional dwellings that have the minimum impact on the building and surrounding area that will contain well-designed interiors.
- 5.22 Every aspect of the design development has been carefully considered with respect to the location of the site and the surroundings. The design will be in keeping with the modern appearance that compliments and reflects locality.
- 5.23 Constructed as lightweight timber frame building with steel frame supports, the finishing material will be in dark aluminium cladding panels with single ply polymeric membrane to the flat roof element.

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- 5.24 All windows will be thermally broken composite Aluminium, powder coated in a dark colour to match and/or compliment the cladding.
- 5.25 The new external envelope will be formed in composite construction of the above materials that will have achieve low u-values and low air-leakage rates.
- 5.26 This overall design approach retains the overall simplicity of the building with the added roof element set-back from the building frontage in modern high quality materials which respect those proposed for the remainder of the existing building would achieve a high standard of design.
- 5.27 It is concluded therefore that the development proposed would result in a high standard of design responding to the constraints and opportunities of the site and is thereby compliant with development plan policy in this regard.**

Housing Mix and Affordable Housing

- 5.28 This application proposal seeks 9 additional apartments in a mix of one and two bedrooms, and also one three bed unit, each of which are compliant with NDSS size requirements for such units.
- 5.29 The apartments vary in overall size giving a good mix of units within the constraints of the site and each is provided with a private external amenity space in the form of a walk out balcony/terrace.
- 5.30 It is submitted that such provides for an appropriate mix of dwellings on this upper level only urban site.
- 5.31 In addition to the on site amenity proposed there is an open green space nearby at Cavendish Recreation Ground, approximately 210 metres to the south.
- 5.32 Given the upper level of the proposed development the apartments would be light and airy with good access to public transport and local shops in Eastcote.
- 5.33 On the basis of the above it is submitted that the development proposed would constitute an acceptable quality and mix of further residential accommodation on this sustainable site.**
- 5.34 The local planning policy for seeking affordable housing is set out in Hillingdon's Local Plan Part 1 Policy H2 which states that:
- "Housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Local Plan Part 1. For sites with 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units"
- 5.35 The application proposal falls below this adopted threshold for the consideration of affordable housing as established in the Local Plan Part 1 as the application seeks nine units on the site.
- 5.36 In any event this policy must of course now be read in conjunction with the most recent and update NPPF when considering the provision of affordable housing from small developments.
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5.37 The revised NPPF at Paragraph 63 states that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. (our emphasis)

5.38 The definition of major development is set out on the NPPF thus:

“Major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.”

5.39 This application proposes a development which falls below the development plan threshold for the consideration of affordable housing and is also below the thresholds for the delivery of affordable housing in the recently revised NPPF.

5.40 We submit that when the development plan is read in conjunction with the recently revised and most update to date Government guidance then these proposals are of a scale of development for which affordable housing should not be considered or indeed sought.

5.41 On this basis no affordable housing is offered as part of this application which is supported both by national policy and the development plan.

Residential Amenity

5.42 Policy BE24 of the Local Plan seeks the design of new buildings to protect the privacy of the occupiers and their neighbours.

5.43 The site has residential properties adjoining it on its eastern boundary and also a pair of dwellings facing the south eastern corner of the application building.

5.44 There are three storey flats to the west of the site on the opposite side of Field End Road.

Field End Road

5.45 The apartments to the west are set back from Field End Road itself which is a wide highway at this point with a slip road to the front of the application site interspersed with trees.

5.46 On this basis the additional height of development proposed, especially given its set back from the existing building's floorplate, would not result in any loss of sunlight or daylight or indeed overbearing impacts to these properties.

5.47 Turning to matters of privacy these flats already have upper floor windows facing each other across the public realm of the highway and given the distances between them then no loss of privacy would result.

Sunningdale Avenue

- 5.48 To the east of the site is a two storey detached property with a long rear garden which has a blank side gable facing the application site. Its rear garden adjoins the car parking area. This is No2 Sunningdale Avenue shown below



No2 Sunningdale Avenue

- 5.49 The main built form of the Field End Road element of the application site is therefore set back some distance from the mutual boundary with No.2 and already possesses windows in upper floor levels facing the garden of this property.
- 5.50 There are also existing upper floor windows in the gable element of the existing building facing the blank side elevation of this property.
- 5.51 The only additional windows facing this property would be small windows serving an internal corridor and no additional habitable rooms would face this dwelling or its curtilage.
- 5.52 On this basis the additional height of development proposed would not result in any loss of sunlight or daylight or indeed overbearing impacts to these properties and in addition there would be no unacceptable loss of privacy from the development proposed.
- 5.53 There is a pair of two storey dwellings on the opposite side of Sunningdale Avenue which face the south eastern corner of the application site.
- 5.54 Given the distance between properties the additional height of development proposed, especially given its set back from the existing building's floorplate, would not result in any loss of sunlight or daylight or indeed overbearing impacts to these two properties.

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- 5.55 Turning to matters of privacy the front windows of these dwellings already face the upper floor windows of the application site facing each other across the public realm of the highway.
- 5.56 Whilst additional windows and a balcony/terrace are proposed it is submitted that when one takes account of the existing relationship between buildings and given the distances between them then no unacceptable loss of privacy would result from the development proposed.

Woodlands Avenue

- 5.57 There are the rear gardens of properties on this road which face, at an oblique angle, towards the application site.
- 5.58 The rear gardens themselves adjoin the car park and not the building.
- 5.59 Given the distances between properties together with boundary treatment and the design employed it is considered that the development proposed would not result in a loss of amenity to these existing dwellings as a result of overlooking or loss of privacy.
- 5.60 It is concluded overall on this basis that the development proposed would not result in any adverse impacts upon the amenity of surrounding properties and is wholly compliant with Policy BE24.**

Access & Highways

- 5.61 It is not proposed to alter the existing access onto Sunningdale Avenue as a result of this application.
- 5.62 This access has good visibility to this “secondary” highway close to its junction with the principal highway network along Field End Road.
- 5.63 Any additional traffic would not therefore result in any harm to local highway users as a result of the development proposed.
- 5.64 Turning now to car parking some 43 spaces are proposed on the existing surface car park including appropriate disabled car parking provision.
- 5.65 The site is located approximately 180 metres from Eastcote Underground Station. There are bus stops along Field End Road and Southbourne Gardens. The PTAL score for the site is 3, which is moderate.
- 5.66 The revised NPPF in matters of sustainable development, transport and car parking advises at paragraph 105 that: -

*“105. If setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development;
b) the type, mix and use of development;
c) the availability of and opportunities for public transport;
d) local car ownership levels; and
e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”*

5.67 Importantly Paragraph 109 of the Framework 2018 advises that:

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5.68 In terms of the use of parking standards paragraph 106 of the recently revised NPPF advises:

“106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). “

5.69 The surrounding road network features a relatively extensive range of parking controls which include a controlled parking zone (CPZ) which operates Monday to Saturday 9am to 5pm with a mix of double yellow lines on select road junctions.

5.70 The Officer Report in terms of the permitted development consent noted in terms of on street parking:

“Parking stress within the CPZ is considered as moderate which is mainly due to the relatively generous off-street parking provisions of nearby residential dwellings in Sunningdale Avenue which inherently lessen on-street parking demand.”

5.71 If these apartments were to be approved then 56 units would be created overall served by 43 spaces providing a ratio of 0.76 spaces per unit.

5.72 The Officer Report in terms of the permitted development consent noted:

“It is also highlighted that the address has been subject to a subsequent and refused application (23156/APP/2016/3429) consisting of 26 flatted units with a similar overall site parking ratio (0.8) to that now proposed. This refusal was subsequently appealed. Although the appeal was dismissed, the Planning Inspectorate accepted the parking ratio and disagreed with the Council's 'parking under-provision' related refusal reason based partly on a sub-standard parking ratio. The Inspectorate's acceptance of the lower on-plot parking provision was related to the demonstration of the significant spare on-street car parking capacity which could comfortably cater for any marginal parking overspill from the development site without detriment to the surrounding residential catchment.

Henceforth a subsequent application was submitted and approved for 27 residential units with 24 on plot parking spaces (23156/APP/2017/4464). This development proposed 3 houses with 6 on-plot car parking spaces and 24 flatted units served by 18 on-plot spaces. The flatted development therefore had an approved parking ratio of 0.75.

On this premise the level of parking provision for this current proposal is considered acceptable further justified by the good 'real world' public transport accessibility which assists in promoting a modal shift toward sustainable travel coupled with substantive parking controls in the area which would inherently reduce the likelihood of untoward parking displacement onto the public domain.”

- 5.73 On this basis a ratio of 0.76 spaces per unit would continue such an “accepted quantum of parking ratio” on this site and as before the Applicant in order to further assist with the aim of parking restraint, would accept 'Resident Permit Restricted' in order to prevent future occupiers from obtaining parking permits for the surrounding CPZ.
- 5.74 Secure cycle parking is also to be provided on site (in accord with standards) and it is concluded that in such circumstances the provision of car parking proposed would not lead to any severe impacts upon any matters of highway safety.
- 5.75 Furthermore and in accord with the saved UDP standard - 10% of parking spaces provided would be disabled compliant.
- 5.76 Refuse collection will continue via Sunningdale Avenue. A specific bin store location is shown located close to the car park entrance in proximity of the public highway. This will ensure that waste collection distances do not exceed 10m from the point of collection in order to conform to good practice.
- 5.77 The site can thereby comply with local parking standards and would not result in any severe impacts to matters of highway safety.**

6.0 Conclusion

- 6.1 This scheme proposal forms a development which accords with the objectives of the revised NPPF, and also the Development Plan, by increasing residential accommodation on a consented residential site in the urban area by optimising the use of previously developed land without unnecessary encroachment onto Greenfield land. It also offers a dwelling mix which is appropriate for the context, and goes towards meeting the Borough's current and future housing needs.
- 6.2 The proposal will provide a logical and coherent extension to the building which is appropriate to the location, and offers a visually appealing design that complements the building having a positive impact on the character of the area.
- 6.3 The proposed dwellings have been designed to meet the Council's residential standards, on matters of design, residential amenity, accessibility and highways.
- 6.4 Support for this proposal can be demonstrated on sustainability grounds, in that it will make full and effective use of previously developed land, whilst re-using a former office building in a highly sustainable location which offers excellent accessibility to transport and other infrastructure of benefit to the community.**
- 6.5 In the absence of any adverse harm arising, the development proposal should be granted planning permission in accordance with the revised NPPF which states that *“proposed development that accords with an up-to-date Local Plan should be approved”*.