

Residents Services

London Borough of Hillingdon
3N Civic Centre,
High Street,
Uxbridge
Middx.
UB8 1UW

FDB 635/3.01/rjd

22nd December 2021

Dear Sirs

RE: 101 BELMONT ROAD, UXBRIDGE, MIIDX. UB8 1QX.

Please find enclosed a Full Plans application for Change of Use to convert the above property from a single dwelling to 4 no. flats.

However, we wish to point out that further to the granting of Planning permission in 2019 (ref: 44343/APP/2019/381) we wish to renew this application. The application permission expires on the 8th April 2022; the applicant has not been able to commence the approved works hence the application. This is the same scheme that received approval (documents updated to today's date where applicable), there have been no changes to the approved scheme.

In support of the application, we attach the following documents: -

- 1) Full Plans application form
- 2) Certificate B - Certificate of Ownership
- 3) JDA drawings: FDB 635 – 2.01B, 3.01C, 3.02D
- 4) Datum survey drawings: DAT 9.0
- 5) Design & Access Statement
- 6) ADL Traffic Survey and PTAL data (Appendix A of Design & Access Statement)
- 7) CIL form
- 8) Ecology Checklist

Fee to be paid at validation stage when requested.

Should you require further clarification for the above please do not hesitate to contact this office.

Yours faithfully,



RICHARD DOE RIBA

For and on behalf of JANE DUNCAN ARCHITECTS LTD

Encs:

DESIGN & ACCESS STATEMENT

Overview: The property is a Victorian semi-detached single dwelling in a residential street and the intention is to convert this to 4 no. flats with the addition of a small extension at the rear and side.

Amenity space for the proposed flats can be provided at the rear by apportioning part of the garden for the ground floor rear flat (Studio Flat 2) and the remainder for Flats 2, 3 & 4. The front garden is small by comparison, but could also be considered as amenity space.

Design Approach: The design approach has been to impose minimal impact on the appearance of the property. From the street elevation there will be no discernible change except for 2 no conservation rooflights on the front elevation.

Flats 1, 3 & 4 are accessible via the main entrance off Belmont Road. Flat 2, at the rear of the property, is accessed from the side. Please note that No 95 Belmont Road has a side entrance to a first floor apartment easily visible from Belmont Road and Mead Road. Therefore a precedent for a side entrance in addition to the main front entrance has been set.

With regard to the Planning application that was refused (ref: 44343/APP/2018/3007) we have addressed the following Schedule of Reasons for Refusal in the following pages:-

STUDIO FLAT 1: This is a single bed Studio Flat of 37.7 sq.m and in accordance with the 'National Described Space Standard' complies with the following statement:-

Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m².....

It is located on the ground floor at the front of the property taking advantage of the side extension to form a shower room for the flat. The entrance to the flat is beyond the communal stair to provide a degree of privacy for the entrance to the flat.

Under Reason 1 of the Schedule of Reasons for Refusal the following was stated:-

- 1. The proposal would provide an indoor living area of an unsatisfactory size and quality for the future occupiers of flats 1, 2 and 4 and would therefore give rise to a substandard form of living accommodation to the detriment of the amenity of future occupiers. The proposal is thus contrary to Policy 3.5 and Table 3.3 of the London Plan (2016), the Housing Standards Minor Alterations to The London Plan (March 2016), the Mayor of London's adopted Supplementary Planning Guidance - Housing (March 2016) and the Technical Housing Standards - Nationally Described Space Standard (March 2015)*

To address the above the opening between the bedroom area and the living area has been increased in size still further to comply as agreed with case officer this will satisfy Item 1 above.

This now opens up the whole of the space to read as one and also addresses Reason 3 in overcoming the following:-

3. The proposal would result in poor outlook and privacy levels for the bedroom within flat 1 due to its outlook via the flank elevation and its proximity to the shared access and neighbouring flank wall. The proposal would fail to provide an adequate level of privacy, outlook and natural lighting to this habitable room resulting in a poor standard of residential amenity and reliance upon artificial means of lighting, contrary to Policies 3.5 and 5.3 of the London Plan (March 2016) and Policies BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

With the increase of the opening this now opens up the space considerably and allows much more natural light and a better outlook for the flat, no longer reliant on the flank window to provide additional 'back-up' light to the rear of the room. The flank window is at high level so that it would not be possible to look in from outside and thus maintain privacy.

However the main focus of the room will be the large bay window at the front of the property and in terms of the ratio of glazing to floor area equates to 19.6% which means less reliance on artificial lighting. Under Building Regulations 25% is considered an excessive amount of glazing (and has to be justified by SAP calculations) therefore 19.6% is a good balance between too much and too little natural light.

It is envisaged that the single bed will be able to fold away into the wall/cabinet thereby creating a spacious area for use during the day.

STUDIO FLAT 2: This is a single bed Studio Flat of 37.2sq.m with a shower room and as Flat 1 above, meets the requirements of the 'Nationally Described Space Standard' in minimum area required and storage capacity.

Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m².....

To the side of the property, the intention is to demolish the lean-to outbuilding and add a single storey extension linking to the proposed rear extension to form space for the flat. The side extension does not project beyond the flank wall of the house.

To minimize the visual impact of the single storey extension at the rear a contemporary flat roof construction has been introduced. The junction with the adjoining pitched bay roof is overcome by a profiled parapet wall, reflecting the change in shape between the two roofs. The introduction of full height glazing on the rear elevation will allow a great deal of natural light into the living space to create a spacious feel.

Similar to Flat 1 the existing wall of the building has been reduced further to open up the space and to allow more natural light into the room and create a space that meets the required standards set down in Item 1 Reasons for Refusal.

Studio Flat 3: Occupies the existing first floor envelope to form a 1 bedroom flat. The design of the flat did not receive any adverse comments in the Schedule of Reasons for refusal therefore there have been no changes to the layout.

Flat 4: This is a single-bed Studio Flat of 39sq.m It has been necessary to extend the roof at the rear (similar to the extension approved on the neighbouring property) to create the flat. This has been permitted under a Certificate of Lawfulness of Use or Development was certified on 4th July 2017 (ref: 44343/APP/2017/1935) which has been implemented.

This flat has also been revised in terms of its layout to provide a single bed studio flat with a more open arrangement as agreed with the planning case officer. It is felt that it now meets the standards required as set down in Reason 1 of the Schedule.

Generally: The existing dwelling house has the potential for 4 bedrooms with the approved rear dormer (now constructed). The flats conversion proposal would not exceed the number of bedrooms possible with the new attic space provided and therefore the increase density of the residential area would not change significantly.

Access: The access to Flat 1 will be via a level threshold into the communal hall. However due to the change of level from the front to the rear of the property of approximately 450mm, we have not shown a level access to Flat 2, however if absolutely necessary then a 1:10 ramp may be possible within the confines of the garden but we feel there may be a loss of useable amenity space.

Location/car parking: The property is ideally located within easy access to the town centre, underground station and bus terminus which has a positive impact on the PTAL rating of 5.

Reason 2 for Refusal has been addressed and we would like the following to be taken into consideration:-

The Refused application cites table AM14; it refers to 1 bed flats but did not factor in that there are 3 no. Studio Flats with a single bed/single person (not 'double beds' which has an impact on occupancy) therefore it pre-supposes that one person is going to drive 1.5 cars which is clearly not the case. With a high PTAL rating this has not been factored in either. PTAL is based on walking distance, accessibility and availability of public transport to determine both permitted parking standards and development densities. With a high PTAL rating of 5 this must have a significant bearing on reducing the number of spaces to be provided, it is felt that this was not taken into account by Highways when evaluate the number of spaces required by this proposal.

The applicant owns Frayes Dental Practice at no 105 -107 Belmont Road: When the surgery was enlarged and another flat was added to the building an additional 2 spaces were designated at the rear of the property (Planning application 8324/APP/2008/2560). Therefore the rear of the surgery also serves as residential parking for flats and this has been utilized by the applicant for this revised application providing a further two spaces for the flats at 101 Belmont Road, as it's all in the same ownership.

From the Design & Access Statement submitted with the Planning application (8324/APP/2008/2560), the permit parking and proximity to the town may have also been taken into consideration.

The Planning application for No 99 Belmont Road which received permission (ref: 18508/APP/2010/2434 - next door to this application) stated in the Design & Access Statement (which received approval for 3 flats):-

5.7 The adopted parking standards allow a maximum of 1.5 spaces per unit, giving a total allowance of 4.5, although it is stated that the precise level of provision may depend on housing type and location. There is space within the site to park 5 cars. However, 3 have been provided (one per flat), together with 3 cycle parking spaces. The excellent location of the site in sustainability terms (PTAL rating of 5) with easy access to frequent bus and underground services will more than compensate for the provision of car parking space below the maximum allowance. Moreover, it is understood that the occupants of each of the flats will be entitled to one free residents parking permit and others on payment of a fee.

This has obviously been accepted by Highways and the planning case officer as a factor in approving this scheme (described in the Planning Approval - Reason 4 see below)

4 H7 Parking Arrangements (Residential)

The parking areas shown on the approved plans, shall be constructed, designated and allocated (with one car parking space being allocated to each unit) for the sole use of the occupants prior to the occupation of the development and thereafter be permanently retained and used for no other purpose.

Therefore if 1 no. space per flat was considered satisfactory and has been approved for that application, why do Highways feel they have to impose a higher ratio of 1.5 per flat for our application this does not seem consistent, logical or reasonable. It should also be noted that in the Pre App response the planning officer at the time stated:-

PTAL 5proposed scheme is in accordance with this aim'and was happy to accept two parking spaces (see Planning Background section below).

Belmont Road has on-street parking for permit holders and any shortfall for parking can be addressed by allowing future occupants of the proposed flats to apply to the local authority for a permit.

However the applicant has appointed a Traffic Consultant (ADL Traffic and Highways Engineering Ltd) to provide a supporting statement which is to be found in Appendix A at the end of this Design & Access statement.

ADDITIONAL INFORMATION:

Site area: 0.0257 hectares.

Amenity Space: The amenity space for Flats 1, 3 & 4 equates to 62 sq.m not including the cycle store. (HDAS Design Guidance states 20 sq.m per flat). Flat 2 has its own amenity space of 22 sq.m.

Bicycle/Refuse requirements: There are secure lock-up enclosures for two bicycles per flat for Flats 1, 3 & 4 and also 2 wheelie bins per flat, in a separate enclosure. Additional space for bins could be provided if required. Flat 2 has its own private amenity space for bicycle storage.

PLANNING BACKGROUND (Refused Permission, Pre App Response and Certificate of Lawfulness of Use or Development).

- **Planning Permission:** Refused for the Change of Use (conversion to 4 no. flats) on 22nd October 2018 (ref: 44343/APP/2018/3007) which this document and application addresses.
- **Pre Application:** Advice for the Change of Use (conversion to 4 no. flats) was submitted on 16th September 2016 and a response was received on 23rd February 2017 from planning case officer James McLean Smith. There were a number of issues to be

addressed and are summarized below in blue for clarity, namely (Pre App response numbering):-

2. Design

GROSS INTERNAL AREA:

Stated that the gross internal area of the ground floor flats did not meet the minimum requirements.

This was addressed in the Full Plans application (ref: 44343/APP/2018/3007) and was increased as follows, to provide a gross internal area of :-

- i) Studio Flat 1 = 37.7 sq.m
- ii) Studio Flat 2 = 37.2 sq.m

It is also confirmed that Flats 3 & 4 GIAs comply (i.e. Flat 3 = 52 sq.m, Flat 4 = 41 sq.m)

To address the above concern for Studio Flats 1 & 2, revised copies of the floor plans were emailed on 20th March 2017 (FDB 635 – 3.02A) to James McClean Smith and his response in an email dated 3rd April 2017 states:-

'Sorry for the hold up, I have spoken to my manager and the amendments made to the plans all seem to be acceptable and would allow for the required floor space to be provided without compromising the amenities of any neighbouring residents or future occupants of the site'.

EXTENSIONS:

Page 4 Item 2 Extensions: The concern regarding the side dormer at the rear of the property was addressed through **Permitted Development and a Certificate of Lawfulness of Use or Development** was certified on 4th July 2017 (ref: 44343/APP/2017/1935).

3. Amenity:

GARDEN SPACE

Page 4 and 5 Item 3: Confirms adequate space provided.

NATURAL LIGHT FOR OCCUPANTS:

Page 5 states that *'It is therefore considered that sufficient natural light will be available to the occupants of the proposed flats'*

SOUND PROOFING:

Page 5 Noted

IMPACTS ON AMENITIES OF NEIGHBOURING RESIDENTS

Page 5: The last paragraph states that '*It is therefore considered that the proposed extensions will not harmfully impact upon the amenities of neighbouring residents*'.

4. Highways

Page 5 '*...PTAL 5proposed scheme is in accordance with this aim*'

6. Planning Obligation and CIL (Mayor and LBH)

Page 5: *... not constitute chargeable development under CIL legislation*

Conclusion

The conclusion of the Pre App response at the time was that the scheme in principle was acceptable apart from the GIA of the ground floor flats and the side dormer. These two concerns were addressed and resolved as previously demonstrated.

In addition would like to point out that there are a number of conversions from single dwellings to flats along Belmont Road (neighbouring property at 99 for one) so we feel the precedent has been set for our proposal.

- **Permitted Development and a Certificate of Lawfulness of Use or Development**, was granted on 4th July 2017 (ref: 44343/APP/2017/1935). This was for the construction of new dormers at the rear and the conversion of the roof space.

APPENDIX A

Supporting statement from ADL Traffic and Highways Engineering Ltd.