



PLANNING, DESIGN AND ACCESS STATEMENT

PROPOSAL

FULL PLANNING PERMISSION FOR DEMOLITION OF EXISTING DWELLING AND ERECTION A RESIDENTIAL BUILDING HOUSING 6 FLATS WITH ASSOCIATED BINS AND CYCLE PROVISION. REMOVAL OF CORNER DROP KERB AND WIDENING OF EXISTING FRONT DROP KERB.

LOCATION

59 ELM AVENUE
RUISLIP, MIDDLESEX
HA4 8PE

REPORT

JUNE 2021

PREPARED BY

RAA PLANNING



Application site shown above

Site and Surroundings

The site sits on a wider than average corner plot fronting onto Elm Avenue. The current property is a detached bungalow with a detached garage with 2 vehicle cross overs for front and separate garage parking. The predominant building form is of pairs of semi-detached blocks with a mix of roof level dormer extension accommodation.

The property is located within an accessible location close to shops, public transport, parks and other amenities.

The property is not listed, not within a conservation area and is not covered by a T.P.O with no frontage trees, but a mix of smaller trees to the far rear boundary and mature trees beyond. The property is not within a flood risk zone.

Policy considerations

National Planning Policy Framework 2019 (NPPF)

The London Plan 2021

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)

Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)

Planning Proposal

Demolition of existing residential building and erection of a new residential building housing 6 flats.

Key elements of the proposal are as follows:

Proposed Residential Accommodation and Parking provision

Ground floor

FLAT 1: 2-bedroom flats of **62m²**

FLAT 2: 3-bedroom (flats of **77.5m²**

First floor

FLAT 3: 2-bedroom flats of **62m²**

FLAT 4: 2- bedroom flats of **62m²**

Roof

FLAT 5: 2-bedroom flats of **50m²**

FLAT 6: 2-bedroom flats of **50m²**

- o Shared bins and secure cycle lockers
- o Ground floor flats 1 x 25m² and 1 x 30m² amenity courtyards
- o Communal garden 148m²
- o 55% frontage landscaping cover
- o New small frontage tree
- o Permeable parking surface and permeable footpaths
- o 2 Allocated parking bays
- o Extinguish corner vehicle crossover
- o Widen front vehicle crossover

The proposed development will make efficient use of an underused sustainable site, which is within immediate proximity to a wide range of services, public transport and retail provision that would deliver accessible residential development within a new build suited to respect the residential setting and neighbouring amenities.

Principle of Development.

The site is located off Elm Avenue, which accommodates a mix of residential development dwellings of varying character. The site benefits from extant permission as set out earlier.

The site is close to local amenities, shops, schools and a several public transport options. As such the site can support higher density residential development.

The NPPF 2019 does not preclude previously developed land from being developed and neither does Local Policies subject to other policy considerations.

Paragraphs 68 of the NPPF 2019 states:

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 with existing settlements for homes;

Paragraph 85 of the NPPF 2019 (f) states:

Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

Paragraph 118 of the NPPF 2019 states:

That planning policies and decisions should “promote and support the development of under- utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”.

Paragraph 122 of the NPPF 2019 c) states:

The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

Paragraph 123 of the NPPF 2019 states:

That “Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and

decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.”

The site is an accessible small site sought to be developed by a small developer and will result in a windfall contribution to new housing not previously identified in the allocated housing delivery

The newly adopted London Plan 2021 seeks 1083 dwellings per annum over a 10-year period for the London Borough of Hillingdon.

Under the London Plan 2021, the Council is expected to deliver 295 dwellings per annum from small sites, which meet the criteria of Policy H1 and H2 set out below.

The London Plan 2021 sets out in Policy H1 Increasing housing supply – the need to encourage development on windfall sites not previously identified in the Local Plan and support new housing.

In addition, Policy H2 Small sites – seeks a greater role for small sites in the delivery of new housing provision with Council’s encouraged to significantly increase the net contribution these sites make, through a diversification of sources, location, type and mix of housing supply.

Policy H2 supporting text states:

‘4.2.3 The **small sites minimum targets** in Table 4.2 are informed by the 2017 London SHLAA and show the potential capacity for additional housing on sites of less than 0.25 hectares in size.

The targets are based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints. The small sites targets are a component of, and not additional to, the overall housing targets. The relative contribution from large and small sites in each borough may fluctuate across the target period, providing the overall 10 year borough target is met in a way that is consistent with the policies in the Plan.

The small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019.

4.2.4 **Incremental intensification** of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London’s needs.

Paragraphs 122 and 123 of the NPPF 2019 emphasise the importance of optimising the potential of each site, in locations that are well served by local transport and other infrastructure/services. In this case, the site is within walking distance to Eastcote

Tube Station, Ruislip Manor Tube Station and Victoria Road Local Centre and shops found along Field End Road.

It is considered that the site is in an accessible and sustainable location, and that, on balance, the proposed density level is considered to be acceptable.

With respect to density, the Council is requested to note the adopted London Plan 2021 no longer sets out a density matrix to consider new housing developments against, but rather considers the accessibility of the site as set out about together with the sites own context and ability to accommodate higher density development.

The redevelopment of this site to include higher density development is considered to be in accordance with the Council's Development Plan, the adopted London Plan 2021 and the NPPF 2019, which collectively seek the efficient use of urban land and support the location of new residential development within existing built up and accessible areas.

Material Consideration

The application site benefits from extant planning permission granted under planning appeal APP/R5510/W/19/3232952. Permission was granted on 8th November 2019 for the demolition of the existing bungalow and garage and erection of 2 x 3-bedroom dwellings with associated parking and access. APPENDIX A.

This permission remains extant and spreads development across the width of the wider than average plot.

In justifying the appeal being granted the appeal Inspector stated:

'The area surrounding the appeal site is densely populated with mainly residential properties. The appeal site is a prominent corner plot set next to a highway junction. The built development in the area is mixed with variant styles and design however the predominant form is two storey size dwellings. It is this two storey form and mix of architectural styles which positively contributes to the character of the area.'...

'The proposed dwellings would be modest in size and would be in keeping with the scale of built development in the area. Whilst the proposed properties would appear prominent on the corner plot, they would not be visually intrusive due to the separation with neighbouring properties. The highway junction and surrounding verges maintains visual relief within the built form. The proposal, due to its size and positioning would not encroach on this visual gap and would not have a detrimental effect on openness.'

The appeal Inspector recognises the densely populated urban character of the site and considered the varied character that includes blocks of semi-detached houses of varying design.

The Inspector disagreed with the Council on its assessment of the corner character and found the appeal scheme acceptable with gaps with neighbours and provided by the corner highways to retain the spacious setting between building blocks.

As a starting point the Inspector's decision, which remains extant supports redevelopment and higher density development on the site as well as supporting

similar height buildings to adjoining two-storey semi-detached buildings in place of a bungalow on this corner plot.

The proposed development differs in its extent to provide a single replacement building with 2.5-storey development contained within a building of similar footprint to a pair of semi-detached dwellings and of a similar height.

The extant permission is a material consideration in the determination of this application.

Character & Design

Paragraph 127 of the NPPF 2019 states that planning decisions should ensure 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 users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.



The existing detached bungalow is located on a wider than average corner plot and next to a pair of semi-detached houses. The plot benefits from a generous and enclosed rear garden with a rising road to the side, passing over a railway line to the rear.

The property is finished in a mix of traditional brick and render with tile roof. A modest detached garage is located to the side with a rear conservatory extension.

The property has frontage parking accessed off the front and a corner vehicle crossover. The far rear benefits of mature trees largely sited on the railway embankment.

The property is non-descript and within a setting of generally extended detached and semi-detached properties with visible presences of roof level accommodation and side and dormers.

The property has the potential to be extended under various Permitted Development rights to the side and rear and may qualify for upward floor extensions subject to assessment.



The generous plot provides for a larger plot width, which is approximately double width of existing double plots housing No.55 and No.57 Elm Avenue and No.61 and No.63 Elm Avenue.

Opposite No.50 and No.48a Elm Avenue are collectively located on plot span, which is similar to the plot span of No.59 Elm Avenue, which housing 1 building.

Unlike No.61 Elm Avenue, which is located on the opposite corner, No.59 plot width extends to the edge of Oak Grove public footpath. No.61 is set back from the side by a public verge.

The urban context as shown below includes a mix of residential building types and building scale.



There is no strong pattern of residential form within the immediate setting other than a greater number of blocks of semi-detached properties located within a plot width that is comparable to No.59 Elm, which houses 1 building as oppose to 2 semi-detached houses.

An opportunity exists to site a single building that is reflective in scale and form of a pair of semi-detached dwellings sited on a an almost double width plot.

The Council is aware of the extant permission of 2 detached houses however scope exists for a single wider building form, that respects the visible pattern of mix development and retains a sense of openness between adjoining properties and the general setting beyond the plot.

Existing buildings within the road are finished with a mix of traditional brick, render and pebble dash. Mock Tudor features can be found on several buildings with a mix of buildings with bays and no bays.

Frontage character includes variations in the roof forms with detached houses having steeper pitches and semi-detached houses have more shallow pitches.

The frontage character is one of largely driveway parking with limited presence of lawn and trees. Boundary treatment includes low brick walls and hedges and timber fencing along the sides.

Proposal

The proposal seeks to replace the current building with a 2.5 storey building housing a mix of 1, 2 and 3-bedroom dwellings.

The building will have the external appearance of a pair of semi-detached dwellings although accessed through a single main entrance. The span of the building will be similar to that of a semi-detached block and sit within a plot with a similar span.

The building will be sited further into the plot to allow for safer parking layouts and provide planting buffers. The setback respects the varied frontage building line as well as the rear building line.

With respect to the previous application for 6 dwellings, it is noted the Council Design Officer determined the width of the building to be acceptable and reflective of a pair of semi-detached houses. The height of the building is the same as next door.

In terms of setback the Council is requested to note that the building line varies along both sides of Elm Avenue. No.1 Lime Grove on the opposite corner is set forward of No.52 Elm Avenue, likewise No.42 Elm Avenue is set forward of No.44 Elm Avenue.

It was noted the Council Design Officer noted in the previous application for 6 dwellings, the extant permission granted at appeal set the 2 detached houses back from the existing building line, which is a material consideration.

A corner location provides a degree of flexibility in terms of building lines as well as an opportunity to erect a more prominent building which is sensitively designed.

The rear elevation is in line with No.61 rear building line and respects the 45 degree when taken from the adjoining property No.57. The building will retain a 1.45m set back off the boundary with No.57.

A 5.3m gap is retained between the new flank wall of N.59 and the main first-floor flank wall of No.57. The original building at No.59 is sited less than 0.5m off the same boundary with No.597.

No.57 will continue to enjoy an open aspect to its rear garden and due to its largely south facing garden receive daylight and sunlight without obstruction from the new development.

It should be noted the extant permission development is set back 1m from the shared boundary with No.57 than proposed in this application.

The set back to the side border with Oak Grove is retained at 1.31m. The gap beyond the new flank wall and the existing flank wall of No.61 is significant with the nature gap of the two footpaths, the highway and the lawn verge adjoining No.61.

In terms of the roof, the new building will have a largely visible pitch roof with an element of flat roof, which due to the roof design will not be apparent from the streetscene. This area has been reduced down from the previous 6 dwelling scheme.

The building is designed to respect the varying building heights with the mass of the roof broken up by the gable projections and at ground floor elements of modest single-storey front and rear projections.



The above streetscene illustrates the comparison of main ridge heights between the proposed development and the adjoining pair of semi-detached dwellings.

Proposed dormers will be recessed into the roof and with all glazing to be obscure glazed and fixed. In contrast to the previous 6 dwelling application, the current scheme has reduced the 4 larger side dormers to 2 smaller dormers site further back from the frontage. Two rear dormers are added.

The dormers are modest in size and well-spaced apart and set in from the main ridge and eaves so as not to dominate the roof form.

It is noted the Council Design Officer raised concern about the provision of roof level accommodation when commenting on the previous application for 6 dwellings.



The Council Design Officer is requested to note the various examples of houses with roof level accommodation within the vicinity of the application site, either opposite or

along Elm Avenue. These include houses with visible dormers on corner plots or windows sited on front gables at roof level identical to the application proposal.

The Council will also be mindful that houses can be extended and have been under permitted development to include roof level accommodation, via dormers or roof alterations.

Indeed, the Government now supports upward extensions with changes to permitted development rights, which would benefit many houses along Elm Avenue.

A number of houses along Elm Avenue, benefit from roof level extensions, which include full-width dormer extensions.

London Plan policies recognises the need to support residential extensions including upward and roof extensions to meet the growing need of existing householder accommodation across London, especially in accessible and sustainable locations.

The application is merely providing roof level accommodation that other properties along Elm Avenue already benefit from or can accommodate under various permitted development rights and as such there is no material justification to exclude roof level accommodation from this site or scheme in general.

To remove roof level accommodation would make inefficient use of this site and be contrary to NPPF 2019 and the newly adopted London Plan 2021.

In terms of retained amenity areas the wide plot will retain a spacious communal garden and courtyard gardens with sufficient scope for landscaping and retained rear tree cover.

The front aspect will be enhanced from paved to a mix of permeable paving and new planting and lawn with scope for a small tree.

Overall, the design of the development is more reflective of blocks of semi-detached houses found along Elm Avenue with gaps and width proportions being equally reflective within the context of corner and wider plot in general.

Materials & finishes

- Mix of traditional brick with white render finish
- Traditional tile finish
- White frame Window
- External amenity area will be a mix of lawn with planting to the front and rear lawn
- Railings, wooden close board fencing and wooden gates

All boundaries will be enclosed by 1.8m high wooden panels with soft landscaping treatment around the rear where boundary fencing is being replaced.

A metal railing break to the side fence will provide the single-storey side bedroom with a clear side outlook.

Final selection of all materials can be controlled by the Council and delivered by way of a pre-commencement planning condition.

Residential layout

In terms of the mix of dwellings, the proposal seeks to provide 1, 2 and 3-bedroom dwellings. Given the site constraints the proposed mix is considered appropriate for the location.

The Housing Standards - London Plan sets out the minimum 'internal floor spaces required for developments in order to ensure that there is an adequate level of amenity level of amenity for existing and future occupants.'

Each of the dwellings will have a GIA which either meet or exceed the London Plan standards for single-level 1-bedroom flats (50m²) and 2-bedroom flats (61m²) and 3-bedroom flats for 4 persons (74m²).

Each dwelling will have front and rear facing aspects and laid out to stack bedrooms above bedrooms and living spaces above living spaces. All dwellings will have floor to ceiling heights in accordance with the London Plan, which seeks at least 75% to be at 2.3m or above.

The development will naturally seek to meet the requirements of Building Regulations with respect to soundproofing.

The quality of internal living space will be sufficient to provide future occupants with a good internal living environment with access to enclosed private amenity space for the ground floor dwellings and all dwellings having access to communal gardens.

Ground floor parking bays will be separated from the front windows of ground floor dwellings by landscaping buffers that provide sufficient space for a path, lawn, flowerbed planting and small tree planting.

Lastly, the Council is requested to note that with the advent of technology and modern furnishings flats can readily be filled with flat panel televisions, multi functional storage units, laptops and compact utility units which combined can significantly reduce floor space demand within units.

This allows more openness within residential units that can equally contribute to its own internal amenity space.

Amenity Provisions

The Mayor of London's Housing Supplementary Planning Guidance (HSPG) sets out that 5m² of private amenity space should be provided for every 1 or 2-person dwelling, with a further 1m² for each extra occupant.

Where this is not achievable a degree of communal space and proximity to alternative public open space should be considered rather than stifle the delivery of new housing.

The total amenity requirement for this development of 6 dwellings to meet the requirements of The Mayor of London's HSPG will be 35m².

Policy DMHB 18 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that residential buildings should provide external amenity space which is sufficient to protect the amenity of the occupants of the proposed and surrounding buildings.

The proposal provides ground floor dwellings with 25m² and 30m² of enclosed gardens with a communal garden of 148m². The provision is policy compliant.



Notwithstanding onsite provision, the application site is located within walking and cycle distance to 3 separate public open spaces and woodlands. These are identified above and all provide additional space for general walkabouts and play areas.

It is put forward the proposal provides a mix of onsite amenity suitable for the size of flats proposed with the added benefit future occupants will have of being close to a range of public open spaces and having above standard internal living space.

Parking Provision

Paragraphs 102 of the NPPF 2019 states:

(C.) opportunities to promote walking, cycling and public transport use are identified and pursued;

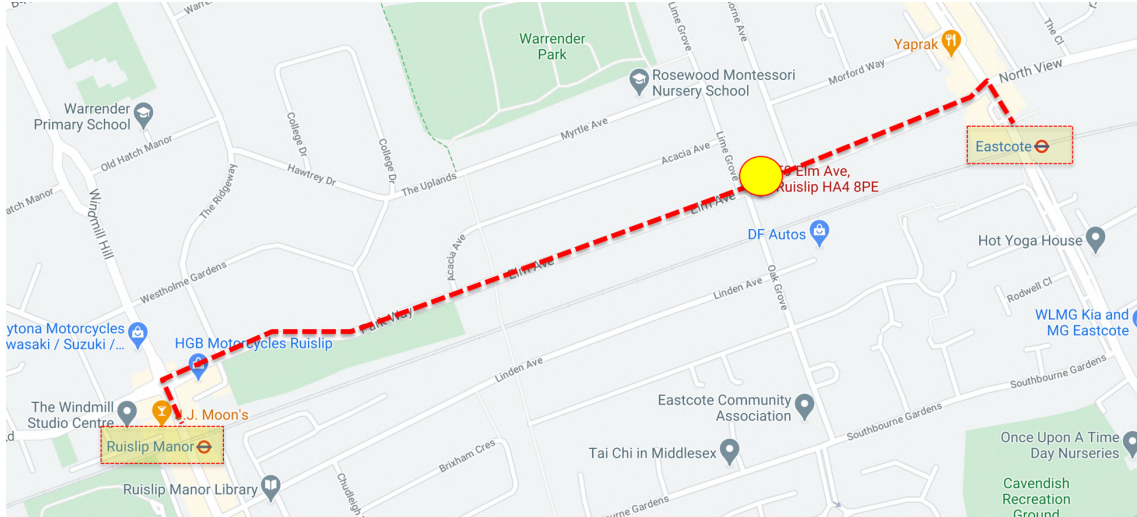
Paragraphs 103 of the NPPF 2019 states:

The planning system should actively manage patterns of growth in support these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

The application site presently provides parking for several vehicles with 2 crossover points, one fronting Elm Avenue and a second located on the corner. The site is within a Controlled Parking Zone.

The site has a PTAL 3 good rating with access to a range of public transport options found at either end of Elm Avenue, including bus services along Victoria Road and Field End Road as well as Eastcote Tube Station and Ruislip Manor Tube Station.

Map below identifies locations of local shops and public transport options.



The proposal seeks to provide 2 parking bays, 1 for each of the ground floor 2-bedroom and 3-bedroom dwellings with no onsite provision for the remaining smaller flats. All parking bays will be finished in permeable paving.

It should be noted that not all occupants seek parking provision. Occupants of smaller dwellings such as 1 and 2-bedroom dwellings are more mobile residents who priorities good quality housing in a sustainable and accessible location with good public transport links above parking.

In this instance future occupants can walk and cycle to local shops, parks, schools and services as well as access local bus services and tube services.

The newly adopted London Plan 2021 supports residential development that seeks less reliance on private cars for trips in accessible and sustainable locations, which is also underpinned by the adopted NPPF 2019, which continues to have a presumption in favour of sustainable development.

The site is located within a sustainable and accessible location and the proposed parking will be in accordance with the NPPF 2019.

The proposal seeks to extinguish an existing corner vehicle crossover and widening an existing drop kerb along Elm Avenue.

In terms of visibility splays, the Transport consultant visited the site to assess access and sightlines.

It was noted the adjoining carriageway has straight and flat horizontal and vertical carriageway alignment, favourable for visibility.

The footway outside the site is approximately 2.4m to 2.5m wide.

Based on site visit observations:

- Looking left / west on egress achievable sightlines exceed 350m (Y distance) × 2.4m (X distance), visibility is further than the pedestrian Zebra crossing
- Looking right / east on egress achievable sightlines exceed 300m (Y distance) × 2.4m (X distance), visibility to the 4-arm signalised junction of Elm Avenue / Field End Road / North View

The Transport consultant concluded the visibility is far in excess of requirements.

In terms of deliveries, it is generally accepted that residential developments generate in the region of 8-9 delivery and servicing trips per 100 dwellings per day.

For the proposed development of 6 dwellings, a TRICS database trip generation exercise would project less than 1 delivery/service vehicle per day or of 0.006 service trips per dwelling (service / goods trip/ other goods vehicles).

The development is of a size that would not significantly increase trip movements around the local highway to the detriment of other highway users and to the amenities of adjoining residents.

The development will continue to safeguard local highway and pedestrian safety through the use of the site and access drives for higher density development and existing non-residential parking.

It noted from the previous application, the Council Highways Officer raised no objection to onsite parking provision.

It was noted the Council Highways Officer independently visited the site and confirmed the Parking Survey conclusions that demonstrated on road parking capacity was available to accommodate overspill parking.

In this instance the reduction to 2 parking bays from the previous 4 parking bays will not materially diminish parking capacity in the area, which was found to be 35 reserve parking bays with a 58% parking stress.

The reserve capacity can accommodate the overspill and not lead to material parking stress.

Lastly, the application is supported by with a Transport Note for the Council's consideration.

Cycle Provision

The proposal will provide secure cycle storage provision as shown on the ground floor plan for all dwellings.

The local amenities including parks, schools, shops and services are all accessible by cycling.

Secure Access

Access into the flats will be via a communal entrance to the building.

Refuse Bins

The proposal provides refuse bins to meet the occupancy needs as per the proposed ground plan and bin specification. These will be sited for ease of collection close to the main access point and public footpath.

Lifetime homes + Lift Assessment

In terms of lifetime homes the Council is requested to be mindful of the need to provide a range of residential dwellings to meet the Council's varied housing demands and that placing demands on every additional dwelling, especially smaller developments for lifetime home requirements are impractical and unviable.

Such measures and housing needs can readily be delivered through larger housing schemes but should not be imposed on smaller housing schemes.

Lift solutions costs upwards of £70,000 plus VAT for providing lift access to in effect 4 upper floor dwellings as ground floor flats do not require the use of the lift.

This requirement would be onerous against the cost to serve 4 dwellings with long term maintenance costs to be paid for via additional service charges by all 6 dwellings.

Notwithstanding this the applicant has explored not only the cost implications for the lift but also the inclusion of a lift in the overall design of the proposal. The Council is referred to the submitted plans, the extract shown above.



The inclusion of a lift in design terms was explored. To accommodate the piston movements that would need to go below ground and above the roof level (shaded in red above) either main roof height would need to be materially increased or a box feature would need to be added at the centre of the roof.

Such changes will result in a building height that fails to be reflective of adjoining properties or result in a lift box above the main roof, which would be out of character.

The lower ground piston movement would not be impactful to the external character but due to the cost of excavation to in effect a basement element, this would add to the cost of what is a modest 6 small dwelling scheme, where the lift would only serve 4 smaller affordable dwellings.

Overall, the development is not considered of a size to economically provide lift provision to serve 4 dwellings in modest development, which would result in unjustified short-term costs as well as long term servicing costs. 2 ground floor dwellings with

their own ground floor gardens are considered to meet lifetime homes compliance by providing 33% of dwellings to be accessible by wheelchair on a small development.

The communal garden is accessible by wheelchair and the rear courtyards can incorporate ramps for access if occupants require.

On other matters the development will need to be compliant with Building Regulations.

Flood Risk Assessment

The site is located within Flood Zone 1, based on the EA's latest Flood Risk Map. The site is not within an area vulnerable to flooding or long-term flooding. A previous FRA was submitted and attached to this submission, the conclusions of which, are material to this current application.

Sustainable Energy

The proposed development embraces principles of sustainable design and construction.

Such measures have been detailed below.

Energy efficiency

- o High levels of insulation to the floors, walls and roof space
- o Double-glazing to all windows and external doors
- o Carefully designed economic and efficient central heating system with high efficiency boilers and heating controls.
- o Low energy lighting will be used on this development.

Water Conservation

- o Low water use appliances both sanitary and kitchen to be utilised.
- o Water but to be provided.

Development

- o Occupants will be encouraged to use the local authority recycling facilities.
- o Convenient access to local public transport, shops and local schools.
- o Dedicated onsite cycle storage unit will be provided

Tree and Landscape

At present the frontage area provides for a fully paved drive providing parking and access footpath. There is zero frontage lawn and landscaping.

The proposed layout will replace the paved hard surface with permeable paving for 2 parking bays and footpaths to enhance onsite surface water drainage.

A new small tree will be sited on the corner of the plot with planting areas and lawn.

53.5m² of the proposed 98m² frontage area will provide a mix of lawn and planting beds, equating to approx. 55%.

This would be 100% new provision in place of no existing frontage landscaping and result in a drainage and landscaping betterment.

There are no significant trees to onsite and all small trees are sought to be retained with additional small tree planting at the front of the site. Rear boundary trees with railway land will remain unaffected by the development.

Affordable Housing

The application is a small development, which is below 9 units and as such does not qualify for affordable housing requirements or assessment.

Neighbouring amenity

The application site is on a corner location and shares a boundary with the semi-detached house No.57 Elm Avenue. To the rear there is a woodland embankment with no residential houses.

On the adjacent corner is No.61 Elm Avenue, which is a bungalow and set back off a public verge. Opposite is No.50 Elm Avenue, a detached two-storey house with a visible large dormer extension and next to it is No.48a, what appears to be a chalet bungalow infill development.

As set out earlier the site plot is wider than average and presently accommodates a detached building with a detached side garage. The property has a rear conservatory. Both will be demolished.

As illustrated earlier the nearest neighbouring property No.57 Elm Avenue will continue to benefit from an approx. 5.3m side to side main wall gap at first-floor or above.

The new building will also be comparable in roof heights to No.57 and will be set further away from the shared side boundary with No.57.

In terms of daylight and outlook, No.57 will continue to benefit from a largely south facing garden with the new development respecting the 45-degree lines of the main building windows.

A daylight and sunlight report has been submitted with this application. Whilst its footprint reflects an earlier application for 6 dwellings, the general siting towards No.57, the nearest neighbour has not changed and as such the conclusions of the report are material to this application, even with the amended scheme.

The rear building line is varied and whilst the new building will project further into the rear due to the 5.3m gap between flank walls any side outlook of the development will not be dominant or enclosing on No.57 main outlook to its garden or harm the use of its garden or internal habitable space.

In terms of side facing windows, all side facing windows will be obscure glazed and fixed with all main rooms being served by clear glazed windows facing front and rear so there will be no direct outlook into adjoining properties.

The ground floor side doors will be frosted to preserve the amenity of each ground floor flats own privacy.

In terms of residential intensification, it should be noted this is a corner location with passing pedestrian movements to the side and front as well as passing traffic along the front Elm Avenue and Oak Grove to the side.

In terms of parking, the provision is sited at the front in an area that already provides for access and parking and as such will not harm the amenities of No.57.

In terms of access to the rear garden and cycle lockers, these are accessed from a side gate adjoining Oak Grove and as such will not harm the amenities of No.57.

The use of the spacious gardens and courtyards will be marginally higher than a pair of semi-detached houses, which has already been approved.

The main entrance and bins for the new building will be set away from No.57 boundary. In the increase in residential for this location is considered acceptable and will not harm the amenities of adjoining residents.

In terms of deliveries and servicing trips, a TRICS database trip generation exercise would project less than 0.06 delivery/service vehicles per day (service / goods trip/ other goods vehicles). The level of trips would be acceptable in this location and would not harm any adjoining residential development.

Overall, the siting, scale, increased residential use and presentation of the new development will have no material impact on the amenities of adjoining neighbours.

In addition, the future occupants of each new build flat will be provided with a good quality internal living space, with appropriate outlook, privacy, daylight and a mix of private and communal amenity provision.

Planning Balance

Part (d) of Paragraph 11 of the 2019 NPPF states where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, the Council should grant planning permission unless:

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

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.

The benefits that add significant weight in favour of the proposal are:

Firstly, the development is well designed and optimizes an under used plot within walking and cycle distance to local shops, services, amenities, multiple tube and bus services. Thereby reducing the reliance on private vehicle trips.

Secondly the development is a small site and the developer subject to planning will seek to build out and deliver the new dwellings in a speedier time frame than larger strategic sites and delivery dwellings suitable for this accessible location.

Thirdly, the development will deliver good quality dwellings with spacious internal living space, onsite private amenity and access to nearby public open space.

The design of the new building will positively contribute to the mix of existing residential buildings within the immediate setting, reflecting the scale and footprint of a semi-detached building form.

Fourth, the Transport Note has demonstrated the level of parking provision on site is acceptable to meet the needs of the proposed development. Future occupants are also more likely to use public transport, cycle or walk for the majority of their trips.

Fifth, the development has been designed so as to continue to safeguard the daylight, amenities and privacy of adjoining properties.

Taken as a whole there are significant deliverable benefits of this scheme.

Conclusion

The proposed scheme seeks to replace an existing residential building with a new building housing 6 new residential dwellings on a wider than average corner plot location.

This application has sought to positively address the Council's concerns with respect to an earlier application for 6 dwellings.

In this instance the proposal now includes a family 3-bedroom dwelling, has removed 2 parking bays closest to the existing corner with a wider on road parking capacity to accommodate the modest overspill and to reduce the number of roof level dorms to the side and reduce the crown area on the roof form.

The proposal has raised the frontage lawn area to 55% of the front area.

The building design will continue to have the appearance of a more traditional finish and largely reflective of a features and materials found in the wider residential area.

The main building height will be within the immediate range setting with the development having a part pitch and gable roof with modest dormers this is reflected in other development in the area and is proposed in a more traditional design form. The modest crown roof is not noticeable from the streetscene.

Given the corner location the scope for a detached distinctive but reflective building form is considered appropriate. In effect one detached building will be replaced with another detached building with finishing a mix of traditional brick and tile features with window styles found in the immediate area.

The quality of internal living space will meet the varied needs of the dwellings occupants and will deliver 6 modern built dwellings from a site that currently houses 1 dwelling. The dwellings will all accord with the requirements of the London Plan in terms of dwelling sizes and standards and includes a family dwelling.

The Council will appreciate Policies H1 and H2 of the adopted London Plan 2021 emphasis on the need to deliver new housing through small sites through more efficient use of land supply from a wider range of locations that can include optimising local and centrally located sites within proximity to local centres.

The application site is within walking distance to shops and services found along Victoria Road and Field End Road and qualifies as a small site under Policies H1 and H2 of the adopted London Plan 2021.

The development will provide dwellings suitable for the location and site constraints and in proximity to a range of local services, shops, bus and tube services.

The proposed provision of parking is considered acceptable in this location, which is well supported by public transport whilst supporting active use of walking, cycling and other non-private vehicle base trips to access local services, parks and schools.

The development provides secure cycle storage provisions to support alternative travel options.

As such the density of development is accommodated on site not only through onsite amenity and quality of living conditions but also in terms of onsite parking and access to a wider range of sustainable travel and service options.

The development will safeguard the amenities of neighbouring properties and provide the future occupants of the new dwellings with a good standard of living space with onsite communal amenity provision as well as nearby access to public open space and other amenity benefits.

Of particular relevance to this application is an economic role, among others, to ensure land is available in the right places to support growth; a social role to support strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations and by creating a high-quality built environment; as well as an environmental role which includes the protecting and enhancing the built environment.

The proposal would have an economic benefit during the construction phase and a social benefit through the provision of 1 replacement and 5 windfall residential units making a small but valuable contribution to local housing supply; this is a clear benefit as it reduces pressure on housing land take elsewhere.

The development will be in accordance with the Development Plan policies of the Council, the National Planning Policy Framework 2019, The London Plan 2021.

The Council is requested to grant planning permission subject to conditions.