

Planning, Design & Access Statement

In support of a planning application to alter and extend the building, including the creation of a second floor to create 2 studio apartments, and alterations to car parking, cycle and refuse storage



**Site at
Unit 6 The Runway,
Ruislip, HA4 6SE**

May 2020

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Allen Planning Ltd in support of a planning application to undertake alterations to the existing building including the creation of a new second floor resulting in an additional 2 studio apartments together with some alterations to the car parking, cycle and refuse storage.
- 1.2 The site has recently received prior approval consent, under Part O of the GPDO, for the conversion of this entire building from B1(a) office use to form 5 residential apartments under LPA reference 74214/APP/2020/496.
- 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.
- 1.4 This application proposes to create an extension and alterations to the front elevation of the building to provide balconies as outside usable space for the consented flats. In addition, it also seeks to create 2 further apartments on a proposed new second floor to the building and therefore if approved such would result in 7 apartments being created across the overall on the site.
- 1.5 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.
- 1.6 At the outset of this Statement it is worth noting the advice of the Framework in terms of making effective use of land which at paragraph 118 amongst other matters promotes:

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

2.0 Site Description

- 2.1 The application site is located on the north west side of The Runway and currently comprises a 2-storey building which was occupied by an office (Use Class B1a) but has permission to be converted to 5 residential units.
- 2.2 The application site is sited on the west side of The Runway, Ruislip, towards its northern end and lies immediately to the east of the Odyssey Business Park, which is accessible via a footpath to the north of the building.
- 2.3 The site lies within the South Ruislip Local Centre as designated in the adopted Hillingdon Local Plan: Part Two.
- 2.4 The building is located at the end of a commercially dominant cul-de-sac off Station Approach (designated as a classified road in the Council's hierarchy of roads) in South Ruislip. The site is within easy reach of South Ruislip LU station and has a PTAL rating of 3 which is considered as moderate but actually such is not in reality

reflective of the 'real world' exemplary public transport provision which is exemplified by the proximity of the adjacent LU station located within 5 minutes walking distance.

- 2.5 In terms of townscape context the application site is now almost totally enclosed by three-storey development with the new St Martin's House scheme adjacent (61166/APP/2018/2418 permission to demolish the existing building to create 9 new build flats with roof garden and amenity space/onsite parking bays) and the three-storey Eagle Point office development at the end of the cul-de-sac.
- 2.6 Indeed the Eagle Point site was under reference 2342/APP/2018/2294 granted permission for demolition of the existing building and the erection of a four storey hotel (Class C1), including ancillary restaurant/cafe/bar and associated car parking
- 2.7 This small road therefore now displays quite an eclectic mix of built form and uses and the existing building on the site, at two storeys in height, is now almost the "odd man out" given surrounding development which exists or is under construction.
- 2.8 The site in its context is shown in Figure 1 below:



Figure 1 - The Site

- 2.9 The site is not within a conservation area and it is not listed and there are no nearby heritage assets.
- 3.0 **Planning History**
- 3.1 Clearly the most material planning history on the site is the recent granting of prior notification consent, under Part O of the GPDO, which permits the conversion of the entirety of the existing building to form five apartments under reference 74214/APP/2020/496.

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 2019, the London Plan 2016 and the Local Plan Parts 1 and 2.

4.2 The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and Policies Map and were adopted as part of the borough's development plan at Full Council on 16 January 2020.

National Planning Policy Framework

4.3 The 2019 **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.

4.4 Paragraph 7 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 advises that there are three overarching objectives to achieving sustainable development: - economic, social and environmental which are interdependent and need to be pursued in mutually supportive ways: -

- An economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type 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;
- A social objective - supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provide 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
- An environmental objective - contributing 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.

4.5 Paragraph 9 requires that 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. It also states that *"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."*

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

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- 4.7 Paragraph 11 identifies the fundamental thrust of the guidance and states that:

“Plans and decisions should apply a presumption in favour of sustainable development.

*For **decision-taking** this 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-date⁷, 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 proposed⁶; 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.”*

⁶ *The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.*

- 4.8 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*

- 4.9 Paragraph 20 identifies that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for amongst other matters: -

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

Delivering a sufficient supply of homes

- 4.10 Paragraph 59 confirms that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”*

4.11 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 amount²⁸”*. For housing, major development means where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.

4.12 Paragraph 68 adds 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:*

e) 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”

Promoting sustainable transport

4.13 In matters of sustainable development, transport and car parking, paragraph 105 advises that: -

“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.”*

4.14 In terms of the use of parking standards, paragraph 106 of the revised NPPF confirms that:

“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). In town centre, local authorities should seek to improve the quality of parking so that it is convenient safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

4.15 Importantly, paragraph 109 of the Framework 2019 states 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”

Making effective use of land

4.16 Paragraph 117 advises that 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.

4.17 To this end, paragraph 118 states that *“planning policies and decisions should:*

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated and unstable land;

d) 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 (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)⁴⁵;

Achieving appropriate densities

4.18 Paragraph 122 states that *“planning policies and decisions should support development that makes efficient use of land, taking into account:*

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) 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;

d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.”

Achieving well-designed places

4.19 The revised NPPF advises that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 124 confirms 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.”*

4.20 Also of relevance is paragraph 127, which states that: -

“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 users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

4.21 Paragraph 128 states that "design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."

4.22 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. 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).

4.23 In determining applications, paragraph 131 confirms that 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.

London Plan, 2016

4.24 The strategic planning policy framework for the application proposal is provided by the **London Plan, 2016** which has been consolidated with Alterations from the 2011 version. It seeks amongst other matters to increase the City's supply of housing.

- 4.25 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”*
- 4.26 **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).
- 4.27 **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.
- 4.28 **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.
- 4.29 **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.
- 4.30 **Policy 7.4** concerns local character, and confirms that “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.”
- 4.31 Architecture is dealt with by **Policy 7.6**. At a strategic level, it states that (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.”
- 4.32 For planning decisions, it states that: -
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“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

- 4.33 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.

- 4.34 **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.”

- 4.35 **The Local Plan Part 2** comprises Development Management Policies, Site Allocations and Designations and Policies Map and is adopted and up to date.
- 4.36 We will make reference to the relevant policies of the Local Part 2 under each assessment in Section 5 below

5.0 Planning Assessment

Land Use

- 5.1 The application site is located within the urban area, as identified in the development plan, within which additional residential development on previously developed land is not only permitted in principle but is actively 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 5 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. Furthermore, the Framework in terms of making effective use of land which at paragraph 118 amongst other matters promotes:

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

- 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 In terms of the development plan **Policy DMHB 11** seeks:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

i) harmonising with the local context by taking into account the surrounding:

- scale of development, considering the height, mass and bulk of adjacent structures;*
- building plot sizes and widths, plot coverage and established street patterns;*
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;*

└ architectural composition and quality of detailing;

| local topography, views both from and to the site; and

- impact on neighbouring open spaces and their environment.*

ii) ensuring the use of high quality building materials and finishes;

iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and

v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

5.9 The existing building has a general commercial style in its appearance and lies within an area displaying significant diversity in the height, uses and materials within the street scene.

5.10 The area contains both large footprint commercial buildings and also a new three storey residential development adjacent to the application site. The other site adjacent has received permission for a four storey hotel.

- 5.11 This application site is not overly prominent in the street scene being located at the end of the cul de sac and adjacent to development of much larger footprint and height.
- 5.12 The proposed development is for a roof top extension to the existing building and also an extension to the front of the building to create usable amenity space for the approved apartments.
- 5.13 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.
- 5.14 The proposed roof extension will provide for a development on this site which accords with the heights of neighbouring buildings and will also lift the appearance of this building from its current rather "tired" condition.
- 5.15 The proposed front elevation below.



- 5.16 **The proposed roof extension, and associated front extension, would sit in a design sense as a single entity improving the townscape by creating an overall improvement to the whole building thereby being wholly in accord with the design guidance in the NPPF and also with policy DMHB11**
- 5.17 As stated earlier, the existing scale of this building is now somewhat inappropriate with its neighbours as they are of much larger footprints and are also three storeys in height.
- 5.18 As a result of this revised context the increased height will produce a building in scale with those which it now sits adjacent to.

- 5.19 The development proposed would therefore significantly enhance townscape by bringing this building into scale with those which surround it, as well as improving its overall visual appearance.
- 5.20 The provision of amenity space for the consented flats would also bring the building into a residential appearance in accordance with its nearest neighbour further enhancing the townscape character.
- 5.21 Overall it is submitted that the development proposed would enhance the appearance of the building, create built form on the site of appropriate scale given its neighbours and as such would constitute a development of a high standard of design appropriate to its context.**

Housing Mix and Affordable Housing

- 5.22 This application proposal seeks 2 additional apartments as studio apartments which are compliant with NDSS size requirements for such units.
- 5.23 Given the constraints of the site, and the overall scale of development proposed, it is submitted that such a mix is appropriate on this upper floor level on this urban site.
- 5.24 Furthermore, this application if approved would also result in significant improvement to the already approved flats within the building through the creation of usable external amenity space further enhancing the already permitted housing stock on the site.
- 5.25 It is also proposed to create an area of amenity space on the roof of the new extension for the benefit of the two proposed new apartments.
- 5.26 Given the upper level of the proposed development the apartments would be light and airy with good access to public transport and local shops.
- 5.27 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.**
- 5.28 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"
- 5.29 Policy DMH7 follows similar thresholds for the consideration of affordable housing.
- 5.30 The application proposal for two additional units falls below this adopted threshold for the consideration of affordable housing as established in the Local Plan.
- 5.31 These policies are also importantly in accord with the most recent and update NPPF when considering the provision of affordable housing from small developments.

5.32 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)

5.33 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.”

5.34 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.

5.35 We submit that given the policies of the up-to-date development plan and also Government guidance then these proposals are of a scale of development for which affordable housing should not be considered or indeed sought.

5.36 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

5.37 Policy DMHB11 amongst other matters seeks the design of new buildings to protect the privacy of the occupiers and their neighbours as set out below.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space

5.38 The proposed development would create additional windows at second floor level in the front and rear elevations together with further balconies in the front elevation.

5.39 The front elevation of the building faces the public realm of the highway and on the opposite side of the road there is commercial development. On that basis the development would not result in the loss of amenity to the commercial occupiers of that site.

5.40 Furthermore, the same situation lies to the rear of the site with commercial property some distance away and are such a development is proposed would not result in the loss of amenity.

5.41 It is concluded therefore that the development would comply in its entirety with the requirements of Policy DMHB11.

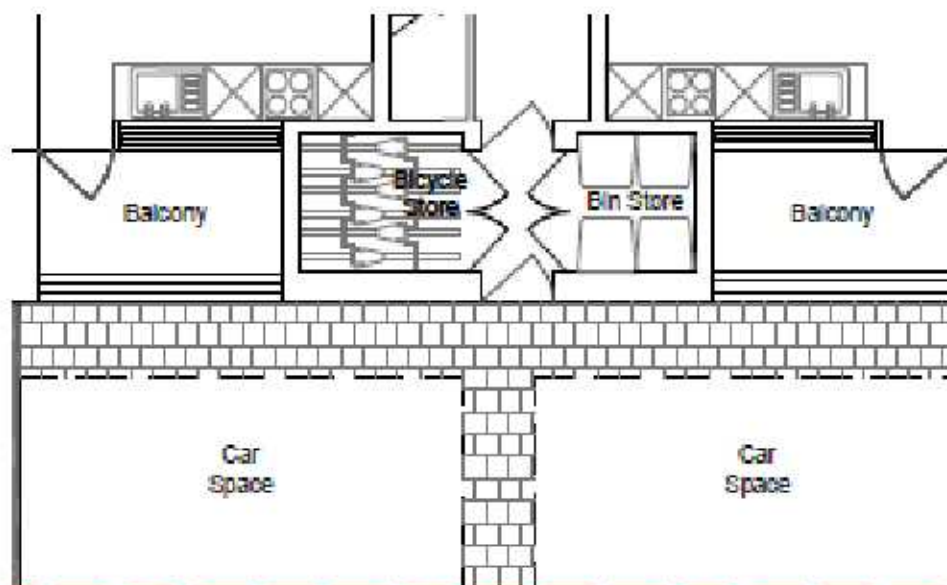
Access & Highways

- 5.42 Local Plan Part 2 Policies DMT 1 and DMT 2 require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.
- 5.43 In these regards the additional traffic created by two small apartments in this urban area would result in minimal, if indeed any, harm to local highway users as a result of the development proposed.
- 5.44 Turning now to 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.”*
- 5.45 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”*
- 5.46 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). “*
- 5.47 The scheme proposes to retain 2 car parking spaces to be utilised with the existing consent on site for 5 units.
- 5.48 Local Plan Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.
- 5.49 Appendix C of the Local Plan provides for parking standards for both cars and cycles and the relevant standards for apartments is set out below:

FLATS	
3 - 4 or more bedrooms - 2 spaces per unit	(a) 1 per studio, 1 or 2 bed unit.
1 - 2 bedrooms - 1.5 - 1 spaces per unit	(b) 2 per 3 or more bed unit.
Studio - 1 space per 2 units	
(a) Proposals must also accommodate visitor's car parking on-site additional to the above	
(b) Car parks must be allocated to dwellings.	
HOSTELS	

- 5.50 The proposed two studio flats would therefore require one space.
- 5.51 Overall, of course if approved this application would result in 7 apartments with 2 spaces.
- 5.52 The road upon which the application site sits exhibits a mix of double and single yellow line waiting restrictions operating 24/7 and between 11am and 12 noon - Monday to Friday respectively.
- 5.53 A controlled parking zone (CPZ) operating from 9am to 5pm - Monday to Friday commences at the end of the cul-de-sac at its junction with Station Approach.
- 5.54 It is submitted that the surrounding road network exhibits characteristics which supports a lower parking quantum than the maximum standard given the extensive surrounding parking controls which severely limit legitimate on-street parking and which would thereby assist in deterring any potential extraneous parking generated by the proposal.
- 5.55 On this basis intended occupiers of the scheme as a whole, and indeed the two proposed studio flats, would therefore be expected to be reliant, more so, on sustainable modes of travel such as walking, cycling and the relatively convenient and efficient public transport services that serves the town centre.
- 5.56 Furthermore, these are maximum parking standards and as a result there is no conflict or policy breach in accepting a lower or even a 'carfree' provision as this does not exceed the set maximum unless such would result in "severe" harm as set out in the NPPF.
- 5.57 Given all of the above it is submitted that the quantum of car parking proposed is acceptable within adopted standards and would not result in any severe impacts to the local highway network.
- 5.58 As a result of the sustainable attributes of the site, and a provision of car parking below the maximum standard and it is important that the scheme is compliant with the LPA's requirements for secure cycle parking.

- 5.59 The overall scheme, including the two flats proposed, would provide for a secure cycle parking area within the building as shown in the extract from the proposed floor plans below.



- 5.60 In order to conform to the LPA's 'waste collection' maximum distance collection parameter of 10m (i.e. distance from a refuse vehicle to the point of collection), the proposed development includes an internal area for waste storage positioned at a point within this set distance.
- 5.61 **Given all of the above it is concluded that the development proposed would not thereby 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 It would accord with the aims and aspirations of the development plan and the Framework in terms of making effective use of land especially with paragraph 118 which amongst other matters promotes:

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed

(including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

- 6.4 The proposed dwellings have been designed to meet the Council's residential standards, on matters of design, residential amenity, accessibility and highways.
- 6.5 **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.**
- 6.6 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"*.