



# ROBINSON ESCOTT PLANNING LLP



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## PLANNING APPLICATION BY

**RICHTON PROPERTIES**

## RELATING TO A PROPOSED REDEVELOPMENT OF

**'TREES',  
CONISTON ROAD,  
BROMLEY,  
BR1 4JB**



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## PLANNING STATEMENT

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**OUR REF: JA/PR/17/268**

**1. INTRODUCTION**

- 1.1. We are instructed by our clients, Richton Properties Ltd, to prepare and submit this application which seeks planning consent for the redevelopment of the site known as ‘Trees’, Coniston Road, Bromley, BR1 4JB.
- 1.2. The application is accompanied by a full suite of planning drawings prepared by Brouard Architects, along with a Design and Access Statement which provides a detailed contextual analysis of the existing site context.
- 1.3. We are familiar with all relevant planning policies at a national, regional and local level, and have undertaken a visit to the application site. In our assessment, and with all matters considered, it is submitted that the proposal is consistent with the objectives of the Council’s adopted planning policies. On this basis, planning permission should reasonably be granted.

**2. THE APPLICATION SITE AND SURROUNDING AREA**

- 2.1. A detailed analysis of the application site and the surrounding area, including a series of contextual photographs, is included within the Design and Access Statement. It is clear that the immediate area is generally characterised by three storey townhouse style properties.
- 2.2. The site is located on the western side of Coniston Road towards the junction with Elstree Hill, with the topography of the area such that the site slopes downwards from front to back.

- 2.3. The existing property on site is of no particular architectural merit. It is a detached chalet style dwelling with accommodation in the roofspace, with a separate detached garage located to the side.
- 2.4. The immediate area is suburban in nature. The site is in a highly accessible location a short distance from Bromley town centre. There are good strategic links to the wider area, and the site is well connected by a number of bus routes to the main centres of Bromley, Beckenham and the local services at Shortlands.
- 2.5. The site is not within a designated Conservation Area or an area with any defined or special residential character. The wider area is also not subject to any specific policy protection in terms of the principle of new developments in this location.
- 2.6. As defined on the Council's Tree Preservation Order's Map, the site is partially covered by an area or 'blanket' Tree Preservation Order (TPO) which was made by the Council in 1960. Accordingly, the applicants have engaged with an arboricultural specialist and this submission is accompanied by a detailed Arboricultural Survey and Planning Integration Report.

### **3. RELEVANT PLANNING HISTORY**

- 3.1. The Council's online planning history records do not contain any record of applications relating directly to the application site.
- 3.2. There does not appear to be any historic records which would preclude a residential development at the site in principle.

**4. THE APPLICATION PROPOSAL**

- 4.1. Full planning permission is being sought for the demolition of the existing dwelling and detached garage on site, and the erection of a terrace of 5 new properties. This will comprise 3 x 3 bedroom terraced houses and 2 x 4 bedroom terraced houses, each with on-site car parking spaces and generous outside amenity areas.
- 4.2. It is proposed to utilise a staggered front building line, commensurate with developments seen in the immediate area, and to maintain significant separation to the site's boundaries – in excess of 2.5m to the southern side and a maximum of 9.4m to the north – in accordance with the requirements of the Council's policies. This will also ensure the spatial standards of the immediate area are respected.
- 4.3. A schedule of accommodation is set out within the Design and Access Statement. Plots 1, 2 and 5 are proposed 3 bedroom properties, with a gross internal area of 125sq.m, 123sq.m and 127sq.m respectively. Plots 3 and 4 are proposed as 4 bedroom properties, with gross internal areas of 149sq.m and 147sq.m respectively. The layout and gross internal areas proposed has due regard for the Mayor's Supplementary Housing SPG, and each property will exceed the minimum space requirements for 3 & 4 bedroom units to accommodate 5/6 people respectively.
- 4.4. In respect of outside amenity space, it is noted that the Council has no fixed guidance in this regard. However, the minimum requirements of the London Plan have been more than adhered to. Each plot would have access to an appropriately sized, defensible outside garden area, with Plots 1 – 4 having garden depths of 11m, and Plot 5 having a 7.75m deep rear garden, but also access to a sizeable outside amenity to the side to be utilised as additional space.
- 4.5. From a car parking and highways perspective, each property will be allocated two car parking spaces, with a forecourt parking space within the frontage of each property and

a second allocated space along the Elstree Hill frontage which is land which is within the applicant’s ownership and forms part of the application site.

- 4.6. The properties will have a logical internal layout with the main kitchen areas located to the front, and the principal habitable living space to the rear with access to the rear garden. The first floor accommodation will comprise bedrooms 1 and 2 for each property, along with the family bathroom. In respect of the accommodation on the second floor, each property will comprise the third bedroom, with Plots 3 and 4 having bedroom 4 and an en suite bathroom. Plots 1, 2 and 5 will have a study/playroom located within the second floor.
- 4.7. The design has been heavily influenced by the site’s surroundings and the contextual analysis which has informed the proposed details. A high quality palette of materials is proposed to ensure that the development sits comfortably within the site’s context, taking architectural cues from nearby development.
- 4.8. High quality hard and soft landscaping is proposed in order to provide a development of a high aesthetic quality with a low maintenance finish which is in harmony with the surrounding area.
- 4.9. The overall height of the development has been carefully and sensitively designed to take pointers from nearby development, and to ensure that adequate and appropriate separation is maintained to the site’s boundaries in accordance with the Council’s requirements. This would also ensure that there would be no harm caused to nearby residential amenities, and the outlook from nearby development would not be negatively affected.
- 4.10. Adequate provision has been made for cycle parking and the storage and collection of refuse bins, in accordance with the requirements of the London Plan. The position of the development within the site is such that there would be no harm caused to

residential amenities by virtue of any perceived overlooking, loss of privacy, any negative effects in respect of daylight and sunlight, or a harmful visual impact.

## 5. **RELEVANT PLANNING POLICY CONSIDERATIONS**

### *National Planning Policy Framework (March 2012)*

- 5.1. The main purpose of the Framework is to help achieve sustainable development through a plan-led system. The core principle of the Framework is that, if development is sustainable, it should go ahead without delay. As paragraph 14 explains, at the heart of the Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan making and decision taking.

### *Core planning principles*

- 5.2. Paragraph 17 sets out the 12 core land use planning principles which should underpin both plan making and decision taking. The relevant principles that apply to the appeal proposal are that planning should:

- *Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*

- *Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; and*
- *Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*

#### *Delivering a wide choice of high quality homes*

- 5.3. Paragraph 49 explains that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 5.4. Paragraph 50 confirms that in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, Local Planning Authorities should:
- *Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; and*
  - *Identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand.*

#### *Requiring good design*

5.5. Paragraph 57 specifies the importance for Local Authorities to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

5.6. Paragraph 58 states that local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

- *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;*
- *Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;*
- *Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life of community cohesion; and*
- *Are visually attractive as a result of good architecture and appropriate landscaping.*



- 5.7. Paragraph 60 states that Local Authorities should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

***Decision-taking***

- 5.8. Paragraphs 186 and 187 confirm that Local Planning Authorities should approach decision-taking in a positive way to foster the delivery of sustainable development, and they should look for solutions rather than problems. Decision-takers at every level should seek to approve applications for sustainable development where possible.

**PLANNING PRACTICE GUIDANCE (PPG) (2014)**

- 5.9. What we consider to be the relevant parts of the PPG are set out below.

***Design***

- 5.10. Achieving good design is about creating places, buildings or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development.
- 5.11. Planning policies should look to create streets that support the character and use of the area. Plans, policies and decisions can effectively manage physical form at a variety of scales. This is how planning can help achieve good design and connected objectives. Where appropriate the following should be considered:

- *Layout – the way in which buildings and spaces relate to each other.*
- *Form – the shape of buildings.*
- *Scale – the size of buildings.*
- *Detailing – the important smaller elements of buildings and spaces.*
- *Materials – what a building is made from*

## THE DEVELOPMENT PLAN

### *The London Plan*

- 5.12. The London Plan explains that the Mayor is clear that London desperately needs more homes in order to promote opportunity and real choice for all Londoners. Accordingly, Policy 3.3 recognises the pressing need for more homes and requires Boroughs to achieve and exceed the relevant minimum Borough annual average housing targets.
- 5.13. Policy 3.4 indicates that, taking into account local context and character, design principles and public transport capacity, development should optimise housing output.
- 5.14. Policy 3.5 emphasises that housing development should be of the highest quality internally, externally and in relation to their context and to the wider environment.
- 5.15. Policy 7.4 recognises that each area will have a different character, and while clear regard must be had to the form, function and structure of an area, proposals should not seek to replicate nearby development but rather represent a positive addition that contributes to the established character of a particular part of each London Borough.
- 5.16. Policy 7.6 seeks to ensure that proposals will make a positive contribution to the streetscape and the wider public realm. The use of appropriate high quality materials and design is also considered to be appropriate. The Mayor is clear in this policy that

proposals must not necessarily replicate the local architectural character, but that the use of sites should be optimised whilst employing good quality design and the use of high quality materials.

*Saved policies of the Bromley UDP (2006)*

- 5.17. The objectives of the relevant saved policies of the 2006 UDP are set out below:
- 5.18. **Policy BE1** sets out general Development Control criteria to enable an assessment to be made as to whether the design of the development is of a high standard, achieves a good layout; respects the amenities of neighbouring residents and those of future occupants.
- 5.19. The general thrust of housing policy in the Bromley UDP is to concentrate new housing development within existing sustainable locations. **Policy H1** is permissive of new housing development within existing residential areas and acknowledges that the scope for new housing occurs mainly on infill sites. The policy seeks to ensure that efficient use of sites in sustainable locations is supported, particularly in or near to town centres.
- 5.20. **Policy H7** concerns housing density and design. It requires new housing development to meet a number of specified criteria that are designed to ensure new development is of an appropriate density, complements the scale and character of the area and safeguards residential amenity, landscape and other features. The policy promotes the efficient use of previously developed land to meet housing requirements and achieving sustainable patterns of development.
- 5.21. **Policy H9** explains that for a proposal of two or more storeys in height, a minimum 1m space from the side boundary of the site should be retained for the full height and length of the flank wall of the building. In areas where higher standards exist, more separation will be required.

- 5.22. The supporting text to Policy H9 confirms that the objective of this policy is to ensure adequate space is retained around residential buildings, providing adequate separation in order to safeguard the privacy and amenity of adjoining residents and future occupants. The policy needs to be applied on a case by case basis, depending on the characteristics of each individual application.
- 5.23. **Policy NE7** covers development and trees, and sets out that the Council will take particular account of existing trees on site. A number of trees within the borough are covered by a Tree Preservation Order (TPO); as stated, the site is covered by a historic 'blanket' TPO from around 1960.
- 5.24. Policy **T3** states that off-street parking spaces in new development will be expected to be provided at levels no higher than the parking standards set out in Appendix II of the UDP.
- 5.25. **Policy T18** states that when determining planning applications, the Council will consider as appropriate the potential impact on road safety and will seek to ensure road safety is not adversely affected.

#### ***OTHER MATERIAL CONSIDERATIONS***

##### ***The Emerging Local Plan***

- 5.26. The Council is in the process of preparing a new Local Plan which was the subject of examination in December 2017. Whilst the policies within the Emerging Local Plan are yet to be fully adopted, the following draft policies are of relevance to this proposal:

- Draft Policy 1 – Housing supply

- Draft Policy 4 – Housing design
- Draft Policy 8 – Side space
- Draft Policy 30 – Parking
- Draft Policy 32 – Road safety
- Draft Policy 37 – General Design of Development
- Draft Policy 73 – Development and trees

### ***New Draft London Plan***

5.27. The new London Plan was published on 29th November 2017 and is out for consultation until March 2018. It includes strong measures to increase housing delivery and sees the London Plan’s housing target ambitiously increased, with Bromley identified as having a capacity based requirement of 1424 dwellings per annum (dpa). This is substantially higher than the current target of 641 dpa.

### ***LBB 5 year housing land supply (HLS) position***

5.28. An appeal decision (2<sup>nd</sup> August 2016) on the issue of 5 year supply is of relevance to this application. In appeal reference *APP/G5180/W/16/3144248* (relating to land rear of the former Dylon International Premises in Lower Sydenham – within the London Borough of Bromley) the Inspector found that:

***“I therefore conclude that...the Council cannot demonstrate a 5 year supply of deliverable housing sites and...the policies that are relevant to the supply of housing are not up to date”.***

5.29. Following the ‘Dylon’ decision, the Council currently assert that it can now demonstrate a five year housing land supply by virtue of a paper agreed by the Council’s Development Control Committee. However, this has not been tested or

examined. Indeed, this position has been heavily challenged through the consultation on the emerging Local Plan.

5.30. Also of relevance are the recent (22<sup>nd</sup> March 2018) appeal decisions relating to Land at the junction of South Eden Park Road and Bucknall Way, Beckenham (appeal references: *APP/G5180/W/17/3174961* and *APP/G5180/W/17/3179001*). These appeals related to two separate redevelopment proposals; one for 105 units comprising 4 bedroom townhouses and 1, 2 and 3 bedroom apartments, and the second for 15 townhouses and 52 apartments. Both appeals were allowed.

5.31. At the public inquiry held to consider both appeals, considerable time was given to looking at whether or not there exists a 5 year housing land supply in the borough of Bromley. While it was unnecessary for the Inspector to draw a conclusion on that point, he found that:

*“...even assuming that the Council can deliver a 5YHLS there is...no ceiling on the amount of future residential development in the Borough. On the contrary, there is a stated requirement in LP Policy 3.3 D to achieve and exceed (my emphasis) the relevant minimum borough annual average housing target of 641dpa in Table 3.1 of the London Plan.”*

5.32. The Inspector also considered the new draft London Plan:

*“Whilst I cannot give full weight to the new draft LP requirement for Bromley of 1,424dpa (set out in the 2017 SHLAA) because this figure has not been moderated or tested at Examination, the trend for the Borough is only ever likely to be upwards, and probably considerably upwards, of the current minimum figure of 641dpa.”*

5.33. He concluded that:

*“In conclusion, it is not my role to pre-empt the outcome of the ELP Examination or the draft LP consultation and Examination. But it is clear that Bromley is likely to have to deliver a step change in dpa completions in the coming years and that its recent failure to adequately balance the need to exceed the delivery of 641 dpa... is unrealistic and unsustainable if London, the capital city and most prosperous part of the UK, is to achieve anywhere near its OAN.”*

- 5.34. In light of this, irrespective of our view that the Council cannot currently demonstrate a five year supply of deliverable housing sites and that the policies that are relevant to the supply of housing are not up to date, it is clear that there should be a presumption in favour of sustainable housing development across London.
- 5.35. The recognised and ongoing need for new housing – and to exceed minimum housing targets – is such that the provision of new high quality dwellings in an existing residential area carries significant benefits, and will assist the Council in the delivery of sufficient new housing in the Borough.

***The Mayor’s Housing Supplementary Planning Guidance (2012)***

- 5.36. The Mayor’s Housing Supplementary Planning Guidance provides guidance on how to implement the housing policies in the London Plan. It is informed by the NPPF and the Governments Housing Strategy for England, and sets out the minimum space standards for new residential development in London.

***London Borough of Bromley Supplementary Planning Guidance***

- 5.37. The Council has adopted two SPG’s related to new residential development in the borough. These are SPG1: General Design Principles and SPG2: Residential Design Guidance, and set out the Councils approach to improving the quality of the borough’s built environment.

**6. DISCUSSION OF THE PLANNING ISSUES**

6.1. It is proposed to demolish the existing dwelling and detached garage on site and erect a new high quality residential development comprising 5 family homes. Each property will have associated car parking spaces and appropriate amenity areas. The main issues for consideration in the determination of this application are as follows:

- *The principle of the development.*
- *The standard of residential accommodation being provided, including amenity space.*
- *The impact on the street scene and character and appearance of the wider area.*
- *The effect on nearby residential amenities.*
- *Car parking and highway implications.*
- *Trees on site.*
- *Other planning considerations including flooding and drainage.*

*Principle of the Development*

6.2. At a principle level, there is strong national and local policy support for the redevelopment of existing residential sites to create more efficient uses and provide new residential accommodation of a high standard.

6.3. The NPPF is clear that Local Planning Authorities should seek to boost significantly the supply of new housing, looking to grant planning consent unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits.

6.4. The existing building on site is of no particular architectural merit and is something of an anomaly in the street scene given the prevailing local characteristics. The proposed



development would accord with the general scale of nearby buildings, making a more efficient use of the site.

- 6.5. The site is located a short distance from a number of bus stops providing regular services to wider destinations including Bromley town centre, Orpington to the south and other centres such as Lewisham and Crystal Palace can be accessed by northbound services. The site is in an existing residential location where the provision of new high quality housing should be afforded substantial weight in the overall planning balance.
- 6.6. The proposed development represents sustainable development. It is our view that, in principle, there should be significant support for the proposal.

***Standard of residential accommodation being provided, including amenity space***

- 6.7. The proposed dwellings will be of a very high standard in terms of internal layout and gross internal areas, far in excess of the minimum space requirements set out within the Mayor’s Housing SPG and the minimum requirements of the London Plan. In respect of the Council’s own adopted policies relating to new residential accommodation, these seek to ensure that each development is of high standard for future occupants and meet the general standards and guidelines set out within the London Plan. There is no conflict, therefore, with the objects of the Council’s planning policies in this respect, nor with the strategic policies of the London Plan and the Mayor’s guidance.
- 6.8. Each dwelling will have a dual aspect allowing an appropriate passage of natural daylight and sunlight into habitable areas. Each property will have good sized living accommodation on the ground floor with a logical layout on the first and second floors, with each bedroom having access to a bathroom/shower room and with windows allowing daylight and a high quality living environment for future occupants.

- 6.9. It is noted that the Council has no fixed standards in respect of amenity space for new developments, however, the minimum requirements as set out within the London Plan have been adhered to. Each property has access to a good sized private, defensible amenity area commensurate with the general spatial standards seen nearby.
- 6.10. Plot 5 has the smallest of the gardens proposed, however, being located on the end of the terrace is such that there is an additional side garden area which could be utilised by future occupants. The rear garden areas and general levels of amenity are considered to be appropriate considering the context and location of the application site.

***Impact on the street scene and the character/appearance of the wider area***

- 6.11. In terms of the design and appearance of the proposed development, the design rationale is set out within the Design and Access Statement prepared by Brouard Architects. It is proposed to use a high quality palette of materials that will enhance the general street scene and provide an attractive development that complements the wider area.
- 6.12. The proposed buildings will be set over three storeys which is entirely commensurate with the wider area. Immediately opposite the site is a terrace of townhouse style properties, with several other examples visible nearby of dwellings of a similar layout and scale to that being proposed.
- 6.13. In respect of the separation to be retained to the site’s boundaries, the development will be set well within the confines of the overall site, maintaining a good separation to all boundaries. The minimum requirements of Policy H9 in respect of distance to be maintained to side boundaries has been met, and the development will maintain a high degree of openness towards the Elstree Hill frontage which will mirror the relationship seen between Yew Tree Lodge on the opposing side of Elstree Hill, again, commensurate with the wider characteristics.

6.14. The Council will recognise that design by its nature is a particularly subjective matter, and the Framework is clear that Local Planning Authorities should not seek to impose architectural styles or designs upon new development. The applicants are happy to accept a planning condition requiring the submission and approval of proposed materials by the Local Planning Authority, prior to the commencement of the development.

*Nearby residential amenities*

6.15. The context of the application site is such that the proposed development would maintain significant distances to the site boundaries, and the scheme has been carefully designed to ensure that there will be no harm to existing levels of amenity enjoyed by neighbouring occupants. There will continue to be a significant separation between the proposed terrace of dwellings and the nearest residential properties along Coniston Road and Elstree Hill.

6.16. The development will address the Coniston Road frontage with its principal elevations facing the road, similar to that seen on the opposite side of Coniston Road, and will utilise a staggered front building line, again, similar to many nearby developments. The properties will address the street satisfactorily without resulting in a harmful visual impact.

6.17. The rear windows to serve the proposed bedrooms at the first and second floors would face in a westerly direction, and the significant separation between the dwellings and the nearest property along Elstree Hill (No. 42) is such that there can be no reasonable allegation of any perceived overlooking or loss of privacy nearby. Flank windows are proposed at first and second floor level to Plots 1 and 5 to add some visual interest in the street scene when approaching the site from a northerly or southerly direction.

- 6.18. The outlook for future occupiers of the development will be of a high standard, with all habitable spaces having a westerly aspect providing good levels of natural daylight and sunlight and a pleasant outlook over the garden areas to the rear.
- 6.19. The general visual amenities of the street scene are considered to be enhanced by this proposal. There is not considered to be any loss of privacy arising from the proposed houses, and the development will not give rise to any conflict with Policies BE1 or H7 of the Unitary Development Plan in respect of existing levels of nearby amenity.

***Car parking and highway implications***

- 6.20. It is recognised that the Council will seek to promote an appropriate level of car parking as part of new residential developments. Accordingly, each property would have two allocated car parking spaces which accords with the Council’s standards.
- 6.21. The application is supported by a Highways Technical Note prepared by Motion Transport Planning which also contains a Swept Path Analysis demonstrating that 5 cars can park in a parallel fashion along Elstree Hill, as shown on the submitted drawings. Therefore, each property will benefit from an allocated car parking space within the frontage, as per other properties along the road, with a second allocated space along land within the applicant’s ownership along Elstree Hill.
- 6.22. The Council will recognise that Coniston Road is a private road which attracts low levels of vehicle movements and low traffic speed. Therefore, the provision of a dropped kerb per property is considered acceptable in highway safety terms.
- 6.23. Appropriate levels of cycle parking space will be accommodated as part of the proposal, with cycle storage facilities located within the amenity areas of each dwelling. Similarly in respect of appropriate storage facilities for refuse bins, these are provided in accordance with the Council’s requirements and are shown on the submitted plans.

- 6.24. The Technical Note also considers any potential for traffic generation arising from the development, and contains an assessment of the likely trip generation arising from the proposal. The assessment concludes that the construction of 5 residential dwellings will have an appropriate level of both car and cycle parking and the effect on the surrounding highway network will be negligible.
- 6.25. In light of the above, there are no apparent traffic or transport reasons as to why the development should not be granted planning consent.

*Trees within the application site*

- 6.26. The site is covered by an historic Tree Preservation Order which was made by the Council in the 1960's. Accordingly, the applicants have engaged Quaipe Woodlands, a specialist arboricultural and woodland consultancy, to undertake a detailed assessment and survey the trees on site. Subsequently a Planning Integration Statement has been produced which should be considered alongside the submitted plans, and contains details of appropriate measures in order to safeguard the long term wellbeing of the trees to be retained.
- 6.27. The accompanying report sets out that 10 low grade trees are to be removed, alongside some incidental pruning.
- 6.28. The applicant's tree consultant has engaged with the Council's tree officer informally, and the Tree Report sets out that there are no Grade A trees which are proposed to be removed. The report also acknowledges that the area or blanket TPO was made in 1960, almost 60 years ago, and consequently none of the trees to be removed are old enough to be protected. The report recognises that one tree (T25) could conceivably be old enough, but it is to be retained and is only proposed to have a secondary leaning stem pruned off.

- 6.29. Two trees (T27 and T28) are an Oak and White Beam respectfully, and are currently growing in a raised bed with a freestanding retaining wall. These two trees are located in front of proposed Plots 4 and 5, and discussions have taken place between the applicant’s consultant and the Council’s tree officer where it was agreed that their longer term potential was sufficiently limited that they could be removed.
- 6.30. The primary intention is to retain the peripheral screening in order to maintain the general appearance of the site. The removal of trees T27 and T28 along the southern boundary will not detract from the landscape, and will not result in a detrimental visual impact upon the character and appearance of the area. The resulting development will have a very similar appearance to the existing terrace of properties directly opposite the application site.
- 6.31. The overall conclusions of the applicant’s tree consultant is that the removal of trees as proposed would maintain the arboreal character of the site, with the peripheral trees to be retained and to continue to provide good screening into and out of the rear gardens.
- 6.32. In light of the detailed assessment provided, there would not appear to be any sustainable aboricultural reasons for resisting the granting of planning consent.

***Other planning considerations including flooding/drainage***

- 6.33. In terms of other issues for the Council to consider, the site is located in Flood Zone 1 which is considered to have a low probability of flooding. The Environment Agency surface water maps identify the proposed development to be in an area at low risk of surface water flooding.
- 6.34. In respect of drainage, hard surfaces proposed for parking areas, etc., would utilise permeable materials, the detail of which could be secured by a suitably worded condition.

**7. CONCLUSIONS**

- 7.1. Having due regard for the context of the site’s location and the existing development on site, there can be no objection in principle to a redevelopment to provide a high quality residential housing development, in a sustainable and accessible location. The residential characteristics of the street scene would be maintained, with the proposed replacement development complementing the immediate area.
- 7.2. The opportunity to provide high quality housing, contributing to the provision of new residential accommodation within the borough, should be given significant weight in the overall planning balance.
- 7.3. Each proposed residential unit has been designed to ensure compliance with the minimum space requirements of the Mayor’s guidance, and each dwelling will have sufficient allocated car parking space and access to a private, defensible amenity area. In terms of the standard of accommodation being provided, there is no conflict with the Council’s Policy H7.
- 7.4. The development has been designed to adhere to the objectives and requirements of the Council’s policies in respect of side space provision, and the requirements set out in Policy H9 of the Saved UDP. In respect of the spatial standards of the area, and the requirements of Policy BE1 and Policy H9, we are of the firm view that there is no conflict in this regard.
- 7.5. Paragraph 60 of the Framework seeks to ensure that proposals do not replicate architectural styles unnecessarily, however, the development has been designed to take architectural cues from nearby housing developments, and will utilise a high quality palette of materials to ensure a positive contribution to the street scene.
- 7.6. The area carries low levels of vehicle movements and traffic, and, as set out in the Technical Note provided by Motion Transport Planning, the proposed parking

arrangement follows a logical layout and will not give rise to any undue negative effect on the existing levels of highway safety or existing levels of parking stress nearby. As such, there is not considered to be a conflict with the requirements of the Council’s policies in respect of parking and highway implications.

- 7.7. The site is recognised as being covered by a historic Tree Preservation Order, and the applicants have engaged with an arboricultural specialist to ensure that any tree removal has been minimised, and that any trees which are to be removed are of a low value such that the prevailing characteristics of the site would remain unchanged. In light of the evidence provided in relation to trees to be removed or retained, the development is considered to be compliant with Policy NE7 of the UDP and follows good arboricultural practice.
- 7.8. The development will not give rise to any negative effects on existing levels of residential amenity nearby in respect of overlooking, loss of privacy, or negative effects in relation to daylight and sunlight. It is our view that the development will enhance the character and appearance of the street, making more efficient use of a currently vacant property on a spacious plot which is not being used efficiently. In line with the requirements of the Council’s Policy BE1, H7 and Supplementary Planning Guidance, the development will not give rise to any demonstrable harm to the visual amenities of the area or the residential amenities of any nearby properties.
- 7.9. Overall, the development will provide much needed residential accommodation within an existing residential area. There is strong national and local policy support for the efficient redevelopment of sites within such locations. The Council will recognise, therefore, that there are clear and significant benefits associated with the proposed development of 5 high quality family dwellings.
- 7.10. In light of the foregoing and all material planning considerations in this case, it is respectfully requested that planning permission should reasonably be granted, subject to any necessary safeguarding planning conditions.