

Planning, Design and Access Statement



**In support of a proposal for Single Storey Rear Extension
and a Rear Dormer extension**

**Site at 29 Vicarage Road,
London
N17 0BB**

December 2022

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Allen Planning Limited on behalf of our Client to support a planning application for a single storey rear extension and also a rear dormer extension.
- 1.2 This site forms one of a pair of buildings and a “sister” application has also been submitted for number 27 in identical form of development to these proposals
- 1.3 At present the site is formed of two apartments and as such has no permitted development rights to undertake extensions to the building.
- 1.4 The purpose of this Statement, is to describe the relevant site context and surrounding area together with the details of the proposed scheme development. It also outlines the planning policy context and provides an assessment of those policies that apply to the proposed development.
- 1.5 These proposals whilst seeking to improve housing stock do not seek to increase housing numbers on site. Both flats on site are currently vacant.

2.0 Site Location

- 2.1 The application site is positioned to the eastern side of Vicarage Road close to the junction with Argyle Road. The site is within a predominantly residential location; however, it is not within a conservation area or within the curtilage of a listed building.
- 2.2 The general location of the site is shown in Figure 1 below

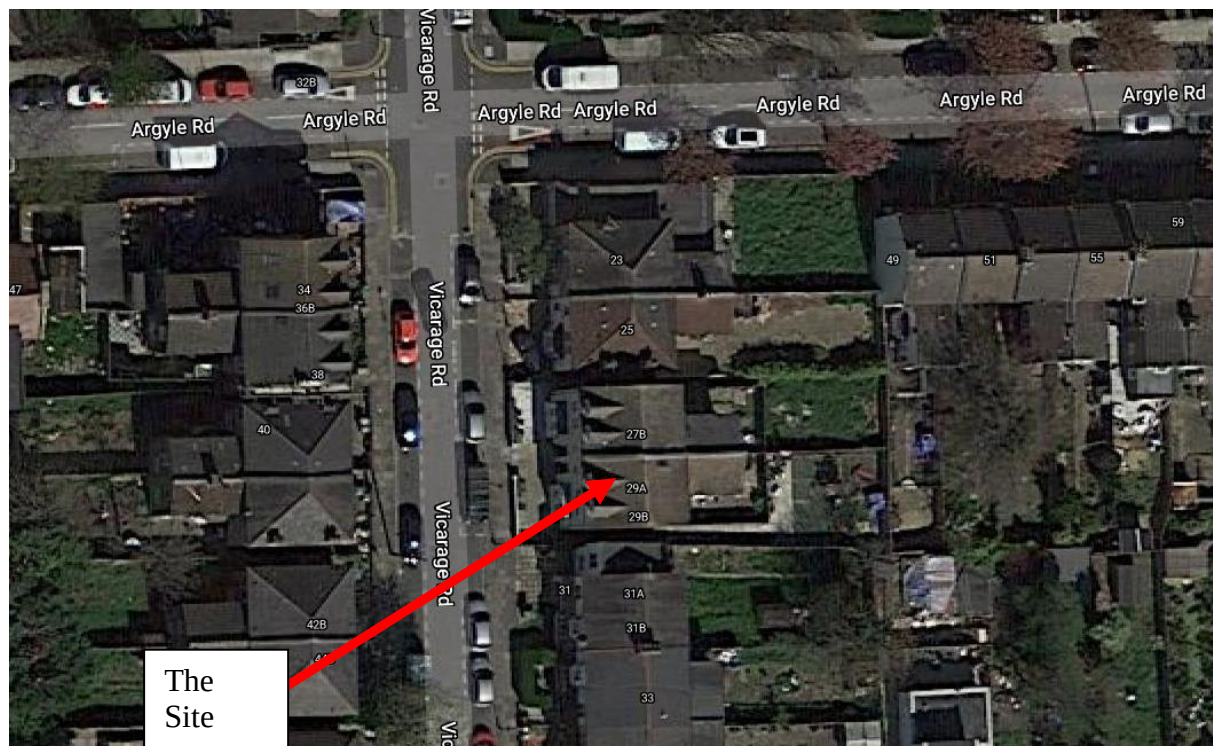


Figure 1 – Site Location

2.3 The building is not listed and not within a Conservation Area and lies within a predominantly residential area.

2.4 The site has a PTAL rating 3 which is average.

3.0 Planning History

3.1 In terms of material planning history, the only recent application was submitted in July 2021 and as yet there is no decision upon that application.

3.2 That application was submitted under reference HGY/2021/2303 for both Nos 27 & 29 for the following description of development:

“Redevelopment of existing residential units to create social housing comprising 4 x 2 bedroom/3 person flats and 2 x 1 bedroom/2 person flats with communal outdoor amenity space, cycle and waste storage.”

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 2021 National Planning Policy Framework; the 2021 London Plan and the Haringey Local Plan 2017 and Development Management DPD.

National Policy - Revised National Planning Policy Framework, 2021

4.2 Turning first to national guidance **Paragraphs 8 -10** of the NPPF advise:

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

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

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

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

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

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11).

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

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

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, 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 proposed⁷;

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

Housing/Best use of land

- 4.4 Paragraph 69 advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

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

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

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

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

- 4.5 In addition paragraph 119 adds 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. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land

- 4.6 Amongst other matters Paragraph 120 adds that Planning policies and decisions should:

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 or unstable land;

- 4.7 Finally, Paragraph 124 also adds 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

- 4.8 It is important at the outset of this Statement to identify that paragraph 120 of the NPPF identifies that planning policies and decisions should amongst other matters:

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

Design

- 4.9 In terms of design paragraph 126 advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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.

- 4.10 Paragraph 130 adds that planning 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 users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

- 4.11 Paragraph 134 notes that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵², taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) 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 2021

- 4.12 The London Plan was adopted in March 2021 and is thereby up to date

- 4.13 **Policy D3** deals with optimising site capacity through the design-led approach stating:

A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.

B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2

- 4.14 **Policy D4** in terms of delivering good design adds:

Design analysis and development certainty

A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.

B Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:

- 1) include a residential component that exceeds 350 units per hectare; or*
- 2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building*

E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

- 1) design reviews are carried out transparently by independent experts in relevant disciplines*
- 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme*
- 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews*
- 4) design review recommendations are appropriately recorded and communicated to officers and decision makers*
- 5) schemes show how they have considered and addressed the design review recommendations*
- 6) planning decisions demonstrate how design review has been addressed.*

Maintaining design quality

F The design quality of development should be retained through to completion by:

- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development*
- 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design*
- 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter*
- 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.*

4.15 Policy D6 addresses matters of housing quality and standards and states:

Housing development should be of high quality design and provide adequately-sized rooms (see [Table 3.1](#)) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

Qualitative aspects of a development are key to ensuring successful sustainable housing. [Table 3.2](#) sets out key qualitative aspects which should be addressed in the design of housing developments.

Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in [Policy D3 Optimising site capacity through the design-led approach](#) than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.

Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space

1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in [Table 3.1](#).

2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.

4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..

5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).

6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.

7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.

8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space

9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1

G The Mayor will produce guidance on the implementation of this policy for all housing tenures.

4.16 Policy H1 addresses the issue of increasing housing supply stating:

Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.

To ensure that ten-year housing targets are achieved, boroughs should: 1) prepare delivery-focused Development Plans which: allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2 enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station³⁹ or town centre boundary⁴⁰ mixed-use redevelopment of car parks and low-density retail

*parks and supermarkets housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses
the redevelopment of surplus utilities and public sector owned sites small sites (see Policy H2 Small sites) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.*

3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

D Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.

E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development

4.17 Policy H2 addresses matters of residential development on small sites adding:

Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:

- 1) significantly increase the contribution of small sites to meeting London's housing needs*
- 2) diversify the sources, locations, type and mix of housing supply*
- 3) support small and medium-sized housebuilders*
- 4) support those wishing to bring forward custom, self-build and community-led housing*
- 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.*

Boroughs should:

- 1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites*
- 2) where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites*

- 3) *identify and allocate appropriate small sites for residential development*
- 4) *list these small sites on their brownfield registers*
- 5) *grant permission in principle on specific sites or prepare local development orders*

4.18

Policy H4 in terms of delivering affordable housing advises:

The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include: 1) requiring major developments which trigger affordable housing requirements⁵⁰ 50 All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)

2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided

3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners⁵¹

4) public sector land⁵² delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio

5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

4.19

Housing size and mix is identified at **Policy H10** which seeks:

“Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment

2) the requirement to deliver mixed and inclusive neighbourhoods

3) the need to deliver a range of unit types at different price points across London

4) the mix of uses in the scheme

5) the range of tenures in the scheme

6) *the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity*

7) *the aim to optimise housing potential on sites*

8) *the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock*

9) *the need for additional family housing and the role of one and two bed units in freeing up existing family housing.*

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:

1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households

2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation

3) the impact of welfare reform

4) the cost of delivering larger units and the availability of grant.”

Haringey Development Plan 2021

4.20 The Development Management Development Plan Document (DPD) was adopted by the Council on the 24 July 2017.

4.21 **Policy DM1** addresses matters of delivering high quality design and advises:

Haringey Development Charter

A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

a Relate positively to neighbouring structures, new or old, to create a harmonious whole;

b Make a positive contribution to a place, improving the character and quality of an area;

c Confidently address feedback from local consultation;

d Demonstrate how the quality of the development will be secured when it is built; and

e Are inclusive and incorporate sustainable design and construction principles.

Design Standards

Character of development

B Development proposals should relate positively to their locality, having regard to:

a Building heights;

b Form, scale & massing prevailing around the site;

c Urban grain, and the framework of routes and spaces connecting locally and more widely;

d Maintaining a sense of enclosure and, where appropriate, following existing building lines;

e Rhythm of any neighbouring or local regular plot and building widths;
f Active, lively frontages to the public realm; and
g Distinctive local architectural styles, detailing and materials.

4.22 Housing quality and design is contained within **Policy DM12** which states:

A All new housing and residential extensions must be of a high quality, taking account of the privacy and amenity of neighbouring uses (see Policy DM1) and are required to meet or exceed the minimum internal and external space standards of the London Plan and the Mayor's Housing SPG.

B Ground floor family housing should provide access to private garden/amenity space, and family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity, privacy and design considerations, or to shared amenity space and children's play space.

C In areas of especially poor residential environmental quality, development proposals should seek to include enhanced provision of green infrastructure, including the quantity and quality of landscaped areas, tree provision and, where the site allows, the provision of additional open space.

D Mixed tenure residential development proposals must be designed to be 'tenure blind' to ensure homes across tenures are indistinguishable from one another in terms of quality of design, space standards and building materials.

5.0 Planning Issues

5.1 This application does not seek to create any additional residential apartments on the site but does nonetheless seek to increase the floorspace of the two existing flats on the site through the provision of a ground floor rear extension and also the provision of a rear dormer extension.

5.2 It is submitted therefore that there are three material considerations pursuant to this application namely the impacts of the development upon matters of design and townscape; the impact of the proposal of any neighbouring residential properties and finally the quality of the residential accommodation proposed to be extended.

Townscape/Design

5.3 Overall these proposals seek to extend the usable living space of the two existing flats on the site utilising the rear elevation only.

5.4 The development proposed would result in no alterations to the "public face" of the building in terms of its front elevation.

5.5 In this respect DPD policy DM1 (Delivering high quality design) requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area by having regard to:

a Building heights;

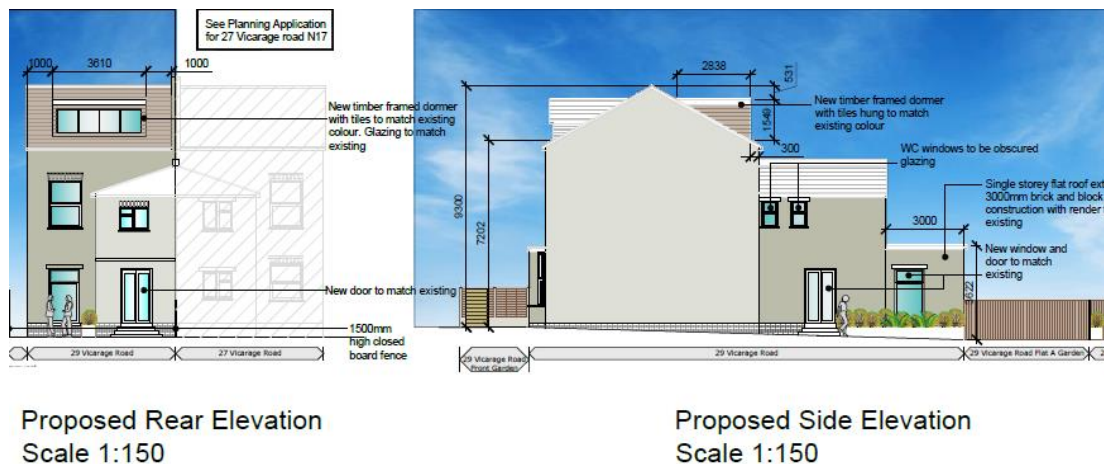
b Form, scale & massing prevailing around the site;

c Urban grain, and the framework of routes and spaces connecting locally and more widely;

d Maintaining a sense of enclosure and, where appropriate, following existing building lines;

e Rhythm of any neighbouring or local regular plot and building widths;

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|------|--|
| 5.6 | These proposals would increase the existing ground floor flat by creating a new flat roof rear extension to the existing “outrigger” measuring circa 3m x 3m. |
| 5.7 | The proposed dormer to the rear would increase the size of the upper floor flat and importantly would sit below the ridge line and above the existing eaves of the building. |
| 5.8 | In addition the dormer would be set in from the sides of the existing roof in accordance with good design practice. |
| 5.9 | Both extensions proposed thereby accord with good practice for extending dwellings/flats and would be created from suitable matching materials to the existing building. |
| 5.10 | This approach is set out in the extract of the proposed rear and side elevation plan below in Figure 2. |



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Impact upon neighbouring properties

- 5.15 Securing a good standard of amenity for all existing and future occupants of land and buildings is one of the core principles of the NPPF. DPD policies DM1 (Delivering high quality design) and DM12 (Housing design and quality) seeks to ensure that development proposals offer a high standard of amenity for the developments' users and neighbours
- 5.15 The proposed development has been sensitively designed to protect the amenities of neighbouring occupants. In this case, consideration has been given to nos. 27 and 31 Vicarage Road as well as no. 49 Argyle Road to the rear.
- 5.16 No. 31 Vicarage Road is positioned to the southern side of the application site. The ground floor extension would project some 3m from the existing outrigger however, as the scheme would retain the existing boundary "set in" and would not increase in height the development such would not appear overbearing or reduce outlook to levels that would be harmful to the amenity of this property.
- 5.17 As shown in the photograph below in Figure 2, the existing property "breaks" the 45o line of sight taken from a first floor habitable room window at no. 31 and although the development proposes to increase the depth of the building, by reason of the single storey nature and "set in" from the common boundary, the proposal would not have an overbearing effect that would cause a sense of enclosure that unacceptable affects living conditions.



Figure 2 – The rear elevation of the site with No. 31

- 5.18 In addition, the first floor window is a study room that has dual aspect with both front and rear windows and therefore, the proposal would not detrimentally impact on the outlook or light levels in this room.
- 5.19 Moreover, by virtue of the orientation the development would not result in an unacceptable loss of daylight/sunlight to the habitable rooms or garden area of this property.
- 5.20 The shared neighbour at No.27 proposes exactly the same development as in this application and either with or without that development occurring these proposals would avoid harm to the residential amenities of the occupiers of the 2 flats within No.27.
- 5.21 No. 49 Argyle Road abuts the rear boundary of the application site and due to the orientation of both properties the development would not introduce direct overlooking of any habitable room windows.
- 5.22 Although the development would introduce a new dormer window into the roof level this would serve a new bathroom and could be obscure glazed if necessary.
- 5.23 Indeed, even if “unobscured” the proposed dormer window would overlook the rear garden and given that these views are already available from the upper floor of No 29 and indeed neighbouring properties it is submitted that the scheme would not have a detrimental impact on matters of privacy to this dwelling or indeed its curtilage.
- 5.24 In addition, the scale of the scheme and separation distances available also ensure that the proposal would not result in a loss of outlook or reduce daylight/sunlight to this property or its rear garden.
- 5.25 In light of the above we consider that these proposals take due account of the amenity of neighbouring residents and are wholly compliant with the requirements of Policy DM1.**

Housing Quality

- 5.26 The proposed additions to the building would improve the quality of the two existing apartments within this building via an increase in floor area.
- 5.27 In this respect the existing ground floor flat would if this scheme is approved benefit from a circa 9m² addition to its kitchen and dining area.
- 5.28 The upper floor flat would benefit from a large new bathroom with a large window.
- 5.29 In addition a new refuse store (front) and cycle storage building (rear) are proposed through this application replacing the “ad hoc” storage of both which currently exists on site. This is a further benefit of the proposed development.
- 5.30 It is submitted therefore that the proposed extensions to these two apartments would represent an improvement to existing housing stock on previously developed land within a sustainable location.**

6.0 Conclusion

- 6.1 The Government actively supports the beneficial use of existing buildings especially in sustainable locations such as this. Furthermore, both national guidance and local policy seek to improve existing housing stock and, on that basis, it is submitted that in principle the development proposed not only accords with planning policy it is also supported by it.
- 6.2 This application seeks to improve the two existing flats on this site and it is submitted that this development be of a high standard of design utilising materials entirely appropriate to the context of the site.
- 6.3 The development proposed would avoid any adverse impacts upon the amenities of nearby residents and would also create no adverse impacts in terms of matters of car parking or highway safety.
- 6.4 **On the basis of all of the above it is concluded that the development proposed is in accord with the development plan, would result in improved and good quality accommodation in a sustainable location and on that basis is compliant with sustainable development of the improvement of existing housing and the relevant policies for such within the Development Plan.**