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## PLANNING APPLICATION STATEMENT

### 275 SANDYCOMBE ROAD, KEW

The enclosed application is submitted in response to comments received in relation to the previous application (reference 15/2682/FUL) that was withdrawn in 2015. The current planning application seeks permission for the demolition of the existing hall and the erection of a new community facility building and 6 flats at 275 Sandycombe Road, Kew.

The planning application is accompanied by the following:

- A completed planning application form;
- A completed CIL form;
- The following drawings by Stiff & Trevillion Architects:
  - Design and Access Statement
  - 3852 – 001 - Location Plan
  - 3852 – 10 – Existing Site Plan
  - 3852 – 20 – Existing Elevations
  - 3852 – 098E – Site Plan Proposed
  - 3852 – 099A - Basement Plan Proposed
  - 3852 – 100F – Ground Floor Plan Proposed
  - 3852 – 101E- First Floor Plan Proposed
  - 3852 – 102G- Second Floor Plan Proposed
  - 3852 – 103G – Roof Plan Proposed
  - 3852 – 200F – Proposed Front (Sandycombe Road) Elevation
  - 3852- 201G - South Elevation
  - 3852- 202E – Rear (Railway line) Elevation
  - 3852 – 203G – North Elevation
  - 3852 – 204G – Elevations AA and BB
- An Energy Statement by Maven Sustainability Limited;
- A Sustainability Checklist by Maven Sustainability Limited, attached as an appendix to the Statement;
- A Parking Statement which includes a Parking Survey by Consequential Ltd;
- Bat Assessment Report by Practical Ecology;

- Transport Assessment by Paul Mews associates;
- Lifetime Homes Standards by Stiff & Trevillion;
- Construction Management Statement;
- Railway Noise Assessment by DKN; and
- Heritage Statement by Turley Associates.

## Site Description

The 0.48 hectare (4,800sqm) site is occupied by a single floor (1 ½ storey height) building with an attached smaller and lower single storey (mono-pitched roof) building to the rear. The rear building is accessed via a separate entrance to the main building which fronts only Sandycombe Road. The buildings are clad in corrugated metal sheeting and have a combined floor area of 290sqm. The buildings are in a poor state of repair, with poor changing facilities and have no windows or doors to allow natural light into or views out of the buildings.

The 225sqm front (largest) part was formerly used as table tennis and snooker hall but is vacant. The well-established and ongoing judo and karate uses take place in the 65sqm building (6mx10m) to the rear which is accessed via a side footpath. The judo karate building has a maximum height of 3.3m. There is no internal connection between the two parts of the building on site.

Sandycombe Road forms the western edge of the site and a railway track runs along the rear (east) of the site. On the opposite side of Sandycombe Road is Lawn Crescent Conservation Area with its distinctive Edwardian houses.

To the north, fronting onto Sandycombe Road, is a substantial and attractive terrace of shops with flats above. There is a former warehouse office building, now accommodating both office and residential uses, to the rear of the terrace fronting onto Sandycombe Road. The three storey southern flank of this office building forms the northern boundary of the site.

Immediately to the south of the site is 273a Sandycombe Road which is a single storey commercial building, extending the depth of the site until it connects with a two storey commercial building to the rear of no.273 and 273a Sandycombe Road.

The majority of the properties further to the south are more modest Victorian style residential terraced and semi-detached buildings, some of which have backland type mixed use developments to the rear.

The site is within walking distance of Kew Railway Station and Sandycombe Road is a regular bus route. The site falls within Controlled Parking Zone KA which is operational Monday to Friday 10am-12pm.

## Planning History

11/0609/FUL

An application was refused planning permission for the redevelopment of the site to provide replacement ground floor club accommodation for billiards and recreation and 8 x 1 bed flats on first and second floors following demolition of the building. The decision was appealed.

The appeal was dismissed on the 7<sup>th</sup> October 2011. This is considered to be the relevant planning history for the site.

The Inspector considered there to be 4 main issues when assessing the appeal:-

- 1) Effect on character and appearance of the area;

The Inspector concluded that the building's significance is not because of its visual appearance, but because of its historical and cultural importance. Therefore there was no objection to its loss subject to a condition requiring the documentation of the building for archiving and the preservation of any historic artefacts.

The Inspector concluded that the redevelopment of the site was acceptable in principle, subject to its replacement with a high quality building. The Inspector stated that the proposed replacement building did not appropriately respond to the strong and attractive character of its surroundings.

- 2) Effect on the living conditions of the future occupiers of the proposed flats with particular reference to amenity space;

The Inspector was not satisfied with the fact that the proposed flats would have no external amenity space.

- 3) Effect of parking on highway safety and capacity and the convenience of highway users;

The Inspector concluded that the lack of onsite parking weighed against the development but not substantially so.

- 4) Effect on the living conditions of the occupiers of the first floor flat at 277 Sandycombe Road.

The design of the proposal would considerably curtail the existing limited oblique outlook from the windows.

15/2682/FUL

An application was submitted in 2015. It sought permission for the demolition of the existing hall and the erection of a new community facility building and 6 flats at 275 Sandycombe Road, Kew.

During the determination of the application the Council raised concerns and requested additional information on a number of items. It was decided that the application would be withdrawn to allow the applicant to take on board the comments and resubmit a scheme that responded to the concerns.

The case officer's email noted 4 items of concern with the 2015 scheme. These are summarised below.

1. Design – the design was supported but the southern flank needed to be reduced as it was considered to be too visible in the south elevation when traveling along Sandycombe Road;
2. Transport –Initially the failure to tabulate the findings of the parking survey was noted as a concern but the Council later accepted that this information was submitted with the planning statement and it had been overlooked by the transport officer. The other comment was that the statement needed to take account of new, part-implemented schemes (that will likely be fully implemented in the next couple of years) in the locality;
3. D2 community space – the council felt that the replacement community space was not fit for purpose and did not provide adequate dimensions for the martial arts use of the space to continue.

At subsequent meetings the council confirmed that the minimum dimension of the space needed to be 12x13m and have a ceiling height of 3.5m;

4. Ecology – a bat roost survey was requested for the existing building, due to its age and close proximity to the railway. The council acknowledged that they had not requested this information before during the numerous pre-application meetings, but wanted it to be assessed.

The current application addresses these 4 items.

There no other redevelopment applications for the site.

### **Pre- Application Consultation**

Following the withdrawal of the application under reference 15/2682/FUL two pre-application dialogues took place on the design and dimensions of the replacement community space. All

### **Application Proposal**

The current application scheme has addressed all four of the concerns raised in relation to application 15/2682/FUL.

The proposal seeks permission for a mixed use development with a two and half storey building fronting onto Sandycombe Road and two storey building with basement accommodation fronting onto the railway line.

The scheme provides:

- A replacement Class D2 unit (329sqm) at basement and ground floor level in the building to the rear;
- 1 no. two bedroom residential unit at first floor level of the building to the rear; and
- 5 no. residential units, 4 x one bedroom units and 2 x two bedroom units in the building fronting onto Sandycombe Road;
- Units 1 has access to 24sqm and no. 2 has access to 16sqm and unit 5 will have access to a 7sqm private balcony;
- Units 3-7 have access to a 42sqm screened roof terrace on the building to the rear;
- The development is car free with no onsite parking spaces being provided;
- Secure undercover bicycle storage is provided on site for both the residential and Class D2 uses. Each flat will have 2 spaces and the Class D2 use will have 7 spaces.

All the units are dual aspect and meet or exceed the London Plan minimum space standards.

### **Other Material Planning Applications**

The Council has requested, at a meeting, that this application scheme consider the cumulative impact on parking of the implementation of the scheme granted planning permission at appeal at 1 and 2 South Avenue.

This appeal decision is material in determining the merits of the current application proposal in regard to parking impact.

Paragraphs 13-20 of the Appeal decision, attached at Appendix 1, relate to parking and servicing. In paragraph 14 the Inspector concluded that the occupancy rate lies in the vicinity of the 90% threshold, at the margin of the preferred level where additional vehicles would be likely to make some contribution to any stress.

The Inspector at paragraph 15 agreed with another appeal decision made in 2011 (APP/L5810/A/11/2152221) that the lack of on-site parking weighs against the scheme but not substantially so. The Inspector went on to state that there is *'limited evidence of specific harm arising out of any excess demand for parking in the vicinity of the site.....no evidence.... linking accidents with parking stress.'* The Inspector went on to state that *'whilst Sandycombe Road is a busy distributor route and relatively narrow, it was noted during the site visit that there was good availability of vacant spaces in the vicinity of the site during the day, when traffic levels would be at their highest.'*

As set out in detail in the submitted Parking Statement the proposal would not take the on street parking stress beyond what the Council submitted it to be in the South Avenue appeal case, i.e. 91%. The Inspector concluded in this appeal that the stress was in the vicinity of the 90% threshold and that there was no evidence of harm arising from this level of demand. The Inspectors conclusions are material in determining the acceptability of the current car free proposal. As such the impact of the current scheme is acceptable.

### **Site Designations**

The site does not yet fall within a conservation area but it is proposed to be incorporated into the adjoining the Kew Conservation area to the north of the site. This amendment is currently undergoing public consultation and not yet adopted. Lawn Crescent Conservation Area is to the west of the site.

The existing building is a building of Townscape Merit. Nos.271-273 to the south, Victoria Parade to the north, and St.Luke's C of E Primary School at 274 Sandycombe Road to the south west and north west are also designated Buildings of Townscape Merit.

In the Character Area Village Planning Supplementary Planning Document the property is located on the east side of Sandycombe Road – Area 7.

The site lies within a designated Mixed Use Area and within an area of Public Transport Accessibility level rating 3 which is moderate.

The site also falls within a Controlled Parking Zone KA which is operational Monday to Friday 10am-12pm.

It is designated for Community Infrastructure Levy in the higher band which is currently £250 per square metre.

### **Key Planning Issues**

The main issues in this case are:-

1. Demolition of the existing Building of Townscape Merit;

2. Proposed community and residential land uses;
3. Design, scale and massing of the replacement building;
4. Impact on the character and appearance and conservation area with BTM'S;
5. Quality of Accommodation;
6. Residential Amenity Impacts;
7. Acceptability of a Car free Development;
8. Refuse/recycling storage;
9. Sustainable Development;
10. CIL financial contribution;
11. Affordable Housing.

### 1. Demolition of Building of Townscape Merit

The existing building is a building of Townscape Merit (BTM).

The Council, in setting out its concerns with the 2015 application did not object to the proposal on the ground of the demolition of the existing building.

The principle of the demolition of the building was considered at appeal in 2011. Both the Council and the Inspector raised no concern with the principle of demolition.

In coming to this conclusion the Inspector noted that:

- The building has a dilapidated appearance (para 4)
- There was no statutory control over the demolition of the existing building (para 4)
- There was no clear explanation or reasons given for the buildings designation (para 4)
- The Council did not appear to oppose redevelopment of the site in principle (para 4)
- The building's significance is not because of its visual appearance, but because of its historical and cultural importance. There were references to historical associations, including visits by royalty.
- The existing building contrasts with the mainly Edwardian style buildings and appears incongruous in the street scene (para 5).
- There was no objection to its loss of the building subject to a condition requiring the documentation of the building for archiving and the preservation of any historic artefacts purposes.

It is significant that the Inspector stated that the aims of the UDP Policy BLT4 and DMP Policy HD3 to preserve and enhance BTM's did not appear realistic in this case. This remains to be the case.

Indeed during the appeal the Council did not oppose redevelopment in principle and the Inspector concluded that the loss of the building would not harm the character or appearance of the area or materially conflict with the policies of BTM's.

The reasons for the Inspector and Council previously accepting the principle of demolition remain unaltered in the current proposal.

It is understood that the site may, in the future, be included in the extension of Kew Conservation Area (no.15), along with other buildings including the Edwardian style buildings adjacent to the site.

Although the inclusion of the site within a designated conservation area would result in a material change since the appeal decision this change is only in regard to whether permission is required to demolish the

building or not. The inclusion of the site within the conservation area would mean formal permission is required for the buildings demolition. It would however not alter the fact that the building is in a very poor state of repair and that it was found by an Inspector to appear incongruous in the streetscene and noted that it was not the visual appearance of the site that was of historic merit but the historical associations.

The community related use of the site would be retained and improved as a result of the proposal and the historical artefacts and associations will be recorded.

It could be argued that the sites inclusion in the conservation area is more of a reason for the incongruous dilapidated building to be removed as its removal and replacement could enable the enhancement of the conservation area.

The Inspector and the Council concluded that given the existing building is a designated BTM the design of any replacement building would have to be of a particularly high standard of design to justify the proposed demolition.

## 2. Proposed Land Uses

### *Community Facility Provision*

The existing building provides a total 329sqm of gross floorspace, within two attached buildings. The rear building, which is in use as a Judo studio, has an area of 65 sqm (6mx10m) and has a mono pitch roof with a maximum height of 3.3 and a minimum height of 2.48m.

There are no windows and therefore no natural light into the front or rear parts of the building. The building has very basic WC and changing facilities which are accommodated in a separate wing and not able to be accessed internally from any parts of the community buildings

It is noted that Core Strategy Policy CP16 and Policy DM SI 2 seek, inter alia, resist the loss of community facilities unless it can be shown that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere.

The application scheme provides a total of 329sqm of replacement community use floorspace at ground floor and basement levels. This represents a 14% increase in the existing floor space given to the community use.

Notwithstanding the fact that the existing judo unit (rear part) is only 65 sqm (6mx10m) and has a roof height of 3.3m dropping down to 2.8m the proposed replacement studio at basement level provides the requested minimum dimensions of 12m x 13m and has a floor to ceiling height of 3.5m. In addition, there is inclusion of changing facilities and WC's and an office. The proposal represents a real planning gain.

The proposed basement results in an enhancement of the existing provision enjoyed by the judo club and other future D2 use operators. The current application improves the community space floor area and significantly improves quality of the floorspace provided when compared with the existing provision.

The floorspace proposed as part of this application would also be of a superior quality to that which exists by virtue of the facts that the proposed facility would have:

- Natural light at ground floor level with high level windows facing west and full windows proposed facing east towards the rear;
- Natural light into the basement via roof lights;
- A 3.5m floor to ceiling height to meet the requirements of karate and judo users;
- A 12m x 13m room;
- Changing facilities in accordance with the Sport England guidelines; and
- Lift access to the basement floor level.

The facility is built in accordance with the Sport England guidelines for Judo and Karate premises and as such it is delivering the aims set out in the Indoor Sports Facility Needs Assessment 2015 and The Kew Village Planning Guidance (SPD adopted July 2014). Both of which seeks to improve health and youth facilities.

It is noteworthy that the residential element of the proposal enables the increased provision and modernisation of the existing recreational and sport facilities on site by providing improved activity areas and fully accessible changing rooms and toilets. The proposal would be in full accordance with Policy CP16 which seeks to ensure there is no loss of community facilities and supports the enhancement in the provision and the quality of existing facilities.

### *Residential*

The introduction of residential units on the site was found to be acceptable to both the Inspector and the Council in 2011 and by the Council in 2015.

The site is located within a designated mixed use area where developments incorporating residential units is actively encouraged. The inclusion of residential on this under-utilised, previously developed site, within a sustainable location adjacent to an established residential estate is supported by local and government planning policy guidance.

Not only is the inclusion of residential acceptable but so is the proposed quantum as it enables the re-provision and improvement of the community facility, which would otherwise not be viable. The residential land use is an enabling, appropriate and compatible land use.

### 3. Design, Layout and Scale

#### Design, Scale and Massing

In assessing the 2015 application scheme the Council supported the design and concluded that it was acceptable and appropriate in the context. The design approach has remained unaltered.

The only aspect of the design that that Council questioned was the dominance of the southern flank.

The current application has reduced the southern flank by setting the front building line back from the road frontage and replacing the side gable end with a mansard roof. These changes result in a reduced building envelope and place more of the building behind the existing built mass of no.273, thus reducing the prominence of the southern flank. The setbacks successfully transition between no.273, the site and Victoria parade to the north.



The siting of the frontage building allows for a landscaped forecourt area, which improves the public realm. The proposal addresses the Council's only concern with the design, layout and scale of the buildings proposed.

#### 4. Impact on the character and appearance of the area and adjoining Conservation Areas and BTM'S

In determining the 2015 application, which was of a similar design the Council accepted that the high quality detail design of the building fronting onto Sandycombe Road would enhance the character and appearance of the area and respect the site's context and the role it plays in terminating view of Lawn Crescent Conservation Area.

The two storey building to the rear would be of a more simple design and would only be glimpsed in views that will be afforded over the single storey element of no.273a, between the proposed frontage building and the two storey house, no.273. The proposed two storey building to the rear would be viewed with the existing two storey commercial property. This building would not be dominant in the streetscene, but serve more as a backdrop, and as such would preserve the character and appearance of the area.

As with the 2015 scheme the design respects the setting of the BTM's in the area and the local character. The proposal would contribute positively to its surroundings in accordance with DM Policy DC1. The high quality and sensitive design of the replacement building on site justifies loss of the BTM which was described by an Inspector as being incongruous in the street scene.

As with the 2015 scheme the architecture of the buildings responds to the area through the materials, proportions and style of building proposed. The scheme accords with the Policy DM H02 which states that infill development must reflect the character of the surrounding area.

#### 5. Quality of Accommodation

The current scheme seeks permission for 6 units, all of which meet the London Plan minimum floor area standards and are dual aspect.

The ground floor flats would enjoy private amenity space in excess of 16sqm. Flat 5 has a private balcony.

The flats at upper floor levels would have access to a roof terrace on top of the two storey building facing the railway line. The space is accessed from the shared footpath running past the communal bicycle and refuse store rooms located within the south facing fabric of the building. The terrace would provide 42sqm of communal amenity space for use by the 4 units at first and roof levels.

The main windows of flat 5 would face towards the railway line and onto its recessed balcony. The orientation of this unit and its proximity to the railway line is no different to the residential units on backland sites in the area, such as the recently converted buildings in South Avenue and the flats being constructed to the rear of 119-123 Sandycombe Road.

All of the units would be built to Lifetime Homes Standards, in accordance with Policy CP14.

## 6. Residential Amenity Impacts

Policy DM DC5 seeks to protect adjoining properties from unreasonable loss of privacy, visual intrusion and noise and disturbance.

### *Privacy*

Flats 1, 2, 3, 4 and 6 are orientated east west with windows facing towards Sandycombe Road and the rear of the site. The orientation of these units is identical to all the flats and houses along Sandycombe Road. All windows in the flank elevations serve non habitable rooms, such as bathrooms and are to be obscure glazed.

The two storey building to the rear of no.273 with windows at first floor level facing the rear of the Sandycombe Road frontage building is in office use. There is therefore no loss of privacy.

There would be no loss of privacy from the windows serving units 1, 2, 3, 4 and 6.

The rear building, with the community facility at ground floor level and flat 5 at first floor level, would have no low level windows serving habitable rooms facing towards Sandycombe Road or the rear of no.273 Sandycombe Road. The windows serving habitable rooms all face onto the railwayline. There would be no loss of privacy from the rear building to any existing or future flats.

In assessing the acceptability of the 2015 scheme, with the same layout and impact the council found the proposal to be in accordance with DM Policy H02 and would not result in a loss of privacy.

### *Outlook*

The scheme has been designed to ensure that the 45 degree outlook arc from the habitable rooms, at first floor level of the properties adjoining the site (no.273 and 277) are not intercepted by the proposal. There is no harmful impact on outlook.

In addition all existing properties and proposed flats would enjoy views, from habitable rooms, over the proposed buildings. The 25 degree outlook line (taken at a height of 1.75m) is not subtended by any part of the new development, thus ensuring outlook is preserved.

### *Daylight/ Sunlight*

The fact that existing and proposed residential units enjoy acceptable levels of outlook and the 25 degree angle line is not subtended by any part of the new development also means that the daylight sunlight reaching existing and proposed buildings would be acceptable.

Drawings 201F demonstrates that the proposed frontage building would not infringe the 25 degree outlook line from the offices at no.273a to the rear of no 273, and as such there is no harmful impact on the daylight/ sunlight enjoyed by the office.

The proposal is in full accordance with Policy DM DC5, the SPD on Small and Medium Housing Sites 2006 and the BRE Site Layout Planning, all of which seek to protect existing and future residential amenities.

The current scheme is more modest in scale and massing than the 2015 scheme that was found to have an acceptable impact. The current scheme therefore has an acceptable impact on the existing residential amenities.

## 7. Car Free Development

The site is currently a car free as there are no onsite parking spaces.

A dropped curb and the provision of onsite parking was proposed in the pre-application scheme. The pre-application consultation response from the Council indicated that the Council's engineers were concerned with the length of the crossover that would result due to the adjoining Couch House and no.273a both having existing vehicle accesses and dropped curbs.

The engineers also raised in principle objection to the loss of an on street residents parking space and the positioning of the vehicle within 10m of both the junction opposite and the bus stop. The Council concluded that the proposal to accommodate onsite parking would be contrary to the adopted Front Gardens and other off street parking standards.

In light of the locational constraints of the site and the Council's engineer's comments, that a dropped curb and the creation of a new access onto the site would not be acceptable, the scheme has been designed as a car free scheme.

Due to the site specific circumstances, at the pre-application for this site the Council officer noted that a car free scheme would be acceptable, subject to the results of the car parking survey concluding that no harm would result. A full parking survey was undertaken in accordance with the council Highways officer, Mary Toffees, requirements.

Policy DM TP8 requires that standards should be met unless it can be demonstrated that there would be no adverse effects in terms of streetscene, local amenity, and road safety and on street parking.

The Council has requested, at a meeting, that this application scheme consider the cumulative impact on parking of the implementation of the scheme granted planning permission at appeal at 1 and 2 South Avenue. The 2013 appeal decision is material in determining the merits of the current application proposal in regard to parking impact.

Paragraphs 13-20 of the 2013 Appeal Decision, attached at Appendix 1, relate to parking and servicing. In paragraph 14 the Inspector concluded that the occupancy rate lies in the vicinity of the 90% threshold, *'at the margin of the preferred level where additional vehicles would be likely to make some contribution to any stress.'*

Importantly the Inspector went on to state that there is *'limited evidence of specific harm arising out of any excess demand for parking in the vicinity of the site.....and no evidence.... linking accidents with parking stress.'*

The Inspector at paragraph 15 agreed with another appeal decision made in 2011 (APP/L5810/A/11/2152221) that the lack of on-site parking weighs against the scheme but not substantially so.

The Inspector at paragraph 20 concluded that *'the lack of onsite parking.....are not substantial grounds to consider any shortfall would have an unduly harmful effect on road safety and the free flow of traffic.'*

The Inspectors conclusions are material in determining the impact of the proposed car free scheme on highway safety as the parking survey findings are very similar to those present at appeal. The survey findings are set out below.

The current schemes 6 spaces and the 2 spaces required for the completed South Avenue scheme would take the theoretical occupancy to 221 (213+2+6) on Tuesday and 226 (218+2+6) on Wednesday. The theoretical occupancy would be 89.6% on Tuesday and 92%. The average is 91% which is the same average the Council submitted at the South Avenue Appeal when the Inspector concluded at the end of paragraph 14 that the respective positions of each party, 88% (appellant) or 91% (council) lay in the *'vicinity of the 90% threshold.'* The Inspector concluded that the lack of parking resulting in the same level of stress did not have an unduly harmful effect on road safety and the free flow of traffic. The impact of the proposal would be the same. It would not have an unduly harmful effect on road safety or free flow of traffic.

The maps and tabled findings are appended to the Parking Statement which accompanies the application submission.

#### 8. Refuse and Recycling

The refuse and recycling stores would be integrated into the southern part of the building to ensure that they are accessible but do not have a harmful impact on the appearance of the forecourt area, which is to be soft landscaped.

The doors to the store would be located along the southern side access, thus allowing for on street servicing to take place. All of the existing properties fronting onto Sandycombe Road have on street servicing arrangements.

#### 9. Sustainable Development

An energy statement and completed Sustainable Construction Checklist, by Maven Sustainability Ltd, forms part of the application submission and demonstrates full compliance with Policy CP1 which requires development to conform to the Sustainable Construction Checklist.

#### 10. Mayoral Community Infrastructure Levy (CIL)

It is accepted that the Mayoral CIL is applicable to the scheme, charged at the rate of £50 per sqm.

It is also accepted that the proposal is subject to the Borough CIL which charges £250 per square meter.

## 11. Affordable Housing

The Council will seek affordable housing contributions in accordance with Policies DM EM2 and DM HO6. Policy CP15 states that on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund will be sought on sites involving new housing.

The Council will have regard to economic viability, individual site characteristics, the overall mix of uses and other planning benefits.

Development Management Plan Policy DMHO6 sets out that on sites capable of less than 10 units gross, a financial contribution to the Affordable Housing Fund commensurate with the scale of development will be required. The policy requires, subject to viability considerations, that for a new build development resulting in 6 new residential units 30% of the units will need to be affordable units.

The client is prepared to make a contribution towards affordable housing and will respond to the request for information from the council at the appropriate time during the determination of the application.

## 12. Ecology

In assessing the 2015 application the Council requested that a bat roost survey be undertaken. Please refer to the submitted survey. An intrusive internal inspection of the building was undertaken by a licensed bat worker and the findings are reported on the Practical Ecology Ltd report submitted in support of the application.

The intrusive internal inspection found no evidence of bats and the report concluded that:

Building 1 was considered to have low roost potential due to the building containing limited internal roosting features and no evidence of bat activity. To mitigate any low/residual risk of harming bats when B1 is demolished, it is recommended that the external corrugated tin panels are removed by hand by the contractor prior to the demolition of the building, to mitigate the low potential risk of encountering a bat.

Building 2 meanwhile, was considered to have very low roost potential given that there was no loft space or suitable external access features.

Building 3 was also considered to have very low roost potential as it contained cobwebbed external access features and a flat roof.

A bat tube should therefore be incorporated into the material design of the proposed building on the eastern aspect. The bat tube is designed to be built into the masonry of an external wall. In addition to this, native night scented plants and trees should be included in the planting scheme for the site to attract moths and other insects that bats prey on.

The appellant would accept conditions requiring the detail of the bat tube and planting to be submitted to and agreed by the Council in advance of construction.