

Application reference: 17/1033/FUL
SOUTH TWICKENHAM WARD

Date application received	Date made valid	Target report date	8 Week date
16.03.2017	16.03.2017	15.06.2017	15.06.2017

Site:

Lockcorp House , 75 Norcutt Road, Twickenham, TW2 6SR

Proposal:

Demolition of Lockcorp House; erection of a part four, part five-storey building comprising 9 no. student cluster flats (49 study/bedrooms in total); three car parking spaces including one disabled space, ancillary cycle and refuse storage and landscaping.

Status: Pending Consideration (If status = HOLD please check that all is OK before you proceed any further with this application)

APPLICANT NAME

Lockcorp Limited
Lockcorp House
75 Norcutt Road
Twickenham
TW2 6SR

AGENT NAME

Mr Robin Harper
The Boathouse Design Studio
27 Ferry Road
Teddington
TW11 9LY

DC Site Notice: printed on 11.04.2017 and posted on 21.04.2017 and due to expire on 12.05.2017

Consultations:

Internal/External:

Consultee

14D POL
14D Urban D
LBRUT Transport
Network Rail
LBRuT Trees Preservation Officer (North)
Thames Water Development Control Department
LBRuT Ecology
LBRUT Environmental Health

Expiry Date

25.04.2017
25.04.2017
25.04.2017
02.05.2017
25.04.2017
02.05.2017
25.04.2017
25.04.2017

Neighbours:

71 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
69 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
67 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
65 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
63 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
61 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
59 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
57 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
11 Alcott House, 73 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
10 Alcott House, 73 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
9 Alcott House, 73 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
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3 Alcott House, 73 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017
2 Alcott House, 73 Norcutt Road, Twickenham, TW2 6SR, - 11.04.2017

1 Alcott House,73 Norcutt Road,Twickenham,TW2 6SR, - 11.04.2017
55 Norcutt Road,Twickenham,TW2 6SR, - 11.04.2017
53 Norcutt Road,Twickenham,TW2 6SR, - 11.04.2017
51 Norcutt Road,Twickenham,TW2 6SR, - 11.04.2017
Greggs,Gould Road,Twickenham,TW2 6RT, - 11.04.2017

History: Development Management, Appeals, Building Control, Enforcements:

Development Management

Status: GTD

Date:23/06/2015

Application:14/0157/FUL

Demolition of the existing light industrial building and replacement with a detached three-storey building (with accommodation in roof) to provide 9 No.flats (all affordable housing) together with 6 off-street car parking spaces and associated amenity and landscaping areas.

Development Management

Status: PCO

Date:

Application:17/1033/FUL

Demolition of Lockcorp House; erection of a part four, part five-storey building comprising 9 no. student cluster flats (49 study/bedrooms in total); three car parking spaces including one disabled space, ancillary cycle and refuse storage and landscaping.

Recommendation:

The determination of this application falls within the scope of Officer delegated powers - YES / NO

I therefore recommend the following:

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

This application is CIL liable

YES* NO
(*If yes, complete CIL tab in Uniform)

This application requires a Legal Agreement

YES* NO
(*If yes, complete Development Condition Monitoring in Uniform)

This application has representations online (which are not on the file)

YES NO

This application has representations on file

YES NO

Case Officer (Initials): DYF

Dated: 13/09/17

I agree the recommendation:

Team Leader/Head of Development Management/Principal Planner

Dated: 19/9/17

This application has been subject to representations that are contrary to the officer recommendation. The Head of Development Management has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

Head of Development Management:

Dated:

REASONS:
CONDITIONS:
INFORMATIVES:
UDP POLICIES:
OTHER POLICIES:

The following table will populate as a quick check by running the template once items have been entered into Uniform

SUMMARY OF CONDITIONS AND INFORMATIVES

CONDITIONS

INFORMATIVES

17/1033/FUL

75 Lockcorp House, Norcutt Road, Twickenham, TW2

Site:

The site is located at the end of the Norcutt Road cul-de-sac and originally accommodated a two-storey office building, Norcutt House and three light industrial units.

The application site has an area of 0.072 hectares and currently occupies a single-storey building (B1 (c) Use) covering approximately half of the site. The remainder of the site is covered in hardstanding.

Norcutt Road is a narrow residential street with predominantly two-storey Victorian terraced housing with the exception of the three-storey block of flats immediately south of the site.

The site is bordered by the railway line to the north with Metropolitan Open Land (MOL) located behind. To the east of the site is an electricity sub-station and to the west is the Gregg's bakery site.

Planning history:

03/2570/FUL was approved by the Planning Committee in November 2003, for 10 private terraced houses, 10 affordable flats and 800sqm of B1 office space. The approved development was never constructed.

05/1797/FUL was refused and dismissed on appeal in November 2005 for the redevelopment of the site to provide 14 No.3 bed terrace houses and 18 affordable flats, due to the proposal being purely residential and would result in the loss of employment land.

06/2018/FUL was approved by the Planning Committee in January 2009, for the demolition of all existing buildings on the site and redevelopment to provide a terrace of 7 houses, 2 x 1 bed flats and 2 studio flats (open market), a single block of 1 x 3 bed, 5 x 2 bed and 5 x 1 bed flats (all affordable) and a single office block comprising of 900sqm GFA with associated off street car parking and landscaping.

The planning permission was accompanied by a Section 106 Agreement, stating:

- 'In the event the developer has not implemented the single office block of 900sqm within 2 years of a material start or by 31 December 2014, whichever is the later, the developer shall pay the Council the affordable housing contribution (£100,000).'

14/0157/FUL was approved by the Planning Committee in June 2015, for the demolition of the existing light industrial building and replacement with a detached 3-storey building (with accommodation in roof) to provide 9 flats (all affordable) together with 6 off-street car parking spaces and associated amenity and landscaping areas.

This approval is in addition to the existing approval (06/2018/FUL). The original S106 agreement was varied to the following:

- 'In the event that the developer has not implemented that part of the development comprising a single office block of 900sqm within two years of a material start or by 1 March 2017, whichever is the later, the developer shall pay to the Council the Affordable Housing Contribution (£100,000), or fully implement the second planning permission (14/0157/FUL) by 1 March 2017 (e.g. implement 3 storey affordable housing building).'

To date, neither the office block (first planning permission) nor the affordable housing block (second planning permission) has commenced construction and therefore, the provisions of the original s106 agreement still stand as regards the affordable housing contribution.

Proposal:

The proposal includes the demolition of an existing light industrial building and the erection of a part four, part five-storey building comprising 9 no. student cluster flats (49 study/bedrooms in total); three car parking spaces including one disabled space, ancillary cycle and refuse storage and landscaping.

The building would be built in London Yellow Stock Brick with the top floor being clad in light grey metal cladding. The building would have a green roof with PV panels (hidden by the parapet). The cycle and bin storage would be located on the eastern boundary and would be timber clad.

The proposal would form part of a larger development for which permission was granted in January 2009, and subsequently part constructed. The completed component of the larger development includes 7 terraced houses and 4 flats (open market) and a block of 11 affordable flats. The uncompleted component of this approval includes a 900sqm office block. A subsequent approval was approved in June 2015, for the section of land intended for the office block. Permission was granted for a three storey building providing 9 affordable flats. The permission has not been implemented.

Main development plan policies:

Core Strategy (2009): CP1 - Sustainable Development; CP2 - Reducing Carbon emissions; CP3 - Climate Change; CP5 - Sustainable Travel; CP6 – Waste; CP7 – Maintaining and Improving the Local Environment; CP14 – Housing.

Development Management Plan (2011): DM SD1 - Sustainable Construction; DM SD 6 - Flood Risk; SD7 - Sustainable Drainage; DM SD 10 - Water and Sewerage Provision; DM OS5 - Biodiversity and new development; DM HO 2 – Infill Development; DM05 – Housing to Meet Specific Community Needs; DM TP 2 - Transport and New Development; DM TP 7 – Cycling; DM TP 8 – Off Street Parking (Retention and New Provision); DM DC1 - Design Quality; DM DC4 - Trees and Landscape requires; DM DC 5 - Neighbourliness, Sunlighting and Daylighting

Supplementary Planning Guidance/Documents: Design Quality SPD (February 2006); Affordable Housing SPD (March 2014); Planning Obligations SPD (November 2014); Residential Development Standards SPD (March 2010); House Extensions and External

Alterations (May 2015); Refuse and Recycling Storage Requirements SPD (April 2015); Small and Medium Housing Sites SPD (February 2006); Sustainable Construction Checklist Guidance Document SPD (January 2016);

Local Plan – Publication version for public consultation (December 2016): LP1 - Local Character and Design Quality; LP8 - Amenity and Living Conditions; LB16 - Trees, Woodlands and Landscape; LP20 – Climate Change Adaptation; LP21- Flood Risk and Sustainable Drainage; LP22 – Sustainable Design and Construction; LP24 – Waste Management; LP34 – New Housing; LP37 – Housing Needs of Different Groups; LP39 – Infill, Backland and Backgarden Development; LP45 – Parking Standards and Servicing.

Public representations:

23 properties were initially consulted on 11/04/17 and a site notice erected, following requests for a wider consultation a further 35 properties were consulted on 16/05/17.

57 objections were received from 51 properties raising the following issues:

Transport concerns

- Inadequate parking provision
- Parking overspill onto the road/ parking stress in the area
- The area needs a CPZ
- The road is a cul-de-sac, increase in pedestrian/vehicular traffic
- Most students have cars
- Students arrive with a car-load of possessions each term
- No provision for delivery vehicles
- No access for emergency vehicles
- More 'short stay' parking spaces are needed
- The halls are too far away from the university, most students will drive
- All developments should be self-sufficient in parking
- Cycle parking won't get used/ not fully accessible
- Previous applications in the Borough have been rejected for lack of parking
- No turning space for construction vehicles
- The conclusions by the transport consultant are wrong
- The extant permission for 9 flats would not generate more traffic

Design/ amenity concerns

- Building is an eyesore
- Too tall/ overshadowing
- Loss of light to neighbouring windows
- Loss of privacy
- Design out of keeping with the road
- Building is too large and overbearing
- The building will block views
- No meaningful landscape proposals
- Light spillage/ controls on external lighting
- Drawings give false impression of height
- Overdevelopment/ high density development

Other issues

- Local plan states student accommodation is a lower priority than affordable housing
- Increase in crime/ anti-social behaviour
- No reference to what the building will be used for in the holidays
- Impact on bats on the River Crane corridor
- No provision for warden accommodation
- No external smoking area
- Students will be there for a year – no interest in community
- Noise and disturbance from students in a family area
- Increase in rubbish
- The Greggs site would be more suitable
- Over-intensification of the site
- No infrastructure to support the use
- Wider notification required
- Developer has carried out no consultation with the neighbours
- The area was subject to an office development only
- Noise during construction
- Contrary to Richmond's Local Plan
- No explanation as to why the use is needed in this area
- Not a suitable location for student accommodation
- Impact on property values
- Have any other sites been considered?
- This site was meant to be for a small office development

Statutory and other non-Council Consultees:

Network Rail

No objections subject to conditions.

Internal comments:

Trees

No in principle objections. The site has no trees of significance; there is a belt of trees that have developed on the railway embankment that soften the view from the playing fields of the current site and the large block of flats behind (No. 73). If these trees are lost then it would have an impact on the view from the adjacent playing fields.

A further consideration given that the proposed block is very close to the railway boundary will be the future management issue regarding the trees and blocking of light (although, as to the north not direct sunlight). The trees are on operational land and therefore the likely hood of regular pruning is low.

The proposal will need to provide tree protection details to demonstrate that the off-site trees can be protected and retained.

Tree planting as shown on the submitted drawing to give a landscape tree adjacent to the railway is supported; the tree would need to be suitable size and species. This could be conditioned along with landscaping requirements.

Ecology

No objections subject to conditions requiring details of external lighting, landscape proposals, wildlife enhancements, brown roof enhancements and bird nesting habitats.

Professional comments:

The main considerations material to the assessment of this application have been summarised as follows:

- Principle of Development
- Design and Impact
- Highways and Transportation
- Amenity Impact
- Living Standards
- Energy and Sustainability
- Railway Impacts
- Trees

Principle of Development

The existing site consists of a light industrial building which was formerly part of a phased redevelopment of a larger site. The Borough has a recognised serious shortage of employment land and premises and is designated as 'Restrictive Transfer' for light industrial premises in the London Plan. The use of employment land for other purposes will only be permitted in exceptional circumstances when the steps set out in DM EM 2 have been followed. The sequential approach has been properly conducted and consent for 100% affordable housing was previously granted permission.

The implementation of 14/0157/FUL would deliver 100% affordable housing in the form of 9 affordable rented flats to address priority local needs. The scheme is supported by a local Registered Provider and the Council's Housing Development Manager and funding is currently available to assist with implementation. A variation was agreed in the Legal Agreement to 14/0157/FUL in relation to the requirement for a payment to affordable housing that would come into effect if previous permissions^{are} not implemented. This application proposes a different use for redevelopment to provide student accommodation of 49 bedrooms.

Policies DMHO5 and LP37 (B) states that planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with other environmental, transport, parking and other relevant policies.

The Council's SHMA argues that the provision of student accommodation seems currently sufficient to meet the local students' needs. The supporting text recognises one of the current priorities as student accommodation to meet needs of institutions within the Borough. The supporting text in the Local Plan specifically clarifies that this is a lower priority than affordable and supported housing priorities. The text in the London Plan also states that if accommodation is not robustly secured for students, it will normally be subject to the requirements of affordable housing policy. The supporting text clarifies that strategies produced by third parties demonstrating local need should have been subject to consultation

with appropriate bodies or verification to demonstrate the robustness of the evidence to the Council. If there is no evidential need arising within the borough, other priorities should be addressed and the capacity for conventional housing should not be compromised. This reflects London Plan Policy 3.8 on Housing Choice.

The scheme was subject to pre-application advice where it was stated the proposal would be brought forward in collaboration with St Marys University and a wider strategy to meet the needs of their student housing. However the application is no longer on that basis and it refers to both universities in the borough - St Mary's University and Richmond American International University.

The Planning Statement refers to their student numbers, and both of their aims for future growth. Paragraph 6.23 refers to a review of accommodation provided by both universities as identifying existing bed spaces located within the borough, and goes on to state "it is evident therefore that the provision of student accommodation in the borough is insufficient to meet current and future needs of the two universities located in the borough (setting aside the London Plan requirement for boroughs to contribute towards meeting strategic need) and unless the shortfall is addressed, it will result in increased pressure on the private rented sector". It also refers to Government guidance encouraging provision of more dedicated student accommodation taking pressure off the PRS and increasing overall housing stock.

The submission does not include a strategy for St Mary's University or a business case that demonstrates local needs for bedspaces. Furthermore, the applicant has not agreed to Heads of Terms that would tie the proposal solely to St Mary's University.

There is no dedicated evidence provided with the application of the local needs, and there is no means to confirm that the proposed bed spaces will be for students at institutions within the borough. The application therefore does not satisfy Policies DMHO5 and LP37(B). Given this is a site with an extant permission for affordable housing, student housing is considered a lower priority than affordable housing, and therefore it does compromise capacity. This also fails to address Policies CP15, DMHO6 and LP37, which set out the framework to require contributions to affordable housing from all sites.

Design and Impact

The NPPF attaches great importance to the design of the built environment and good design is a key aspect of sustainable development. New developments are encouraged to respond to local character and history and reflect the identity of local surroundings and materials. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

Policy DM DC1 of the DMP 2011 and emerging policy LP1 of the publication version of the Local Plan states that new development must be of a high architectural and urban design quality. Development must be inclusive, respect local and contribute positively, to its surroundings based on a thorough understanding of the site and its context.

Norcutt Road consists of predominantly two-storey terraced housing with pitched roofs. To the south of the site is a three-storey block of flats with a pitched roof. The proposed building

has been designed to be sited in approximately the same position as the previously approved housing scheme, extending slightly further to the eastern boundary. The building exceeds the previously approved height but the fifth floor is set back from the southern façade facing Norcutt Street and, as shown on the illustrative perspectives included in the DAS, would have minimal impact in views from the neighbouring townscape given the stepped height progression along the street.

The land to the north of the railway line falls within the grounds of Twickenham Rifle Club and is designated Metropolitan Open Land (MOL). Policy DM OS 2 states that when considering developments on sites outside MOL, any possible visual impacts on the character and openness of the Metropolitan Open Land will be taken into account. It is considered that the poor condition of the existing building, the improved design of the proposed and the presence of similarly sited buildings within the nearby vicinity e.g. Rowntree House; that the proposal would not have a significant impact upon the green, open character of the MOL and its impact is deemed acceptable.

Highways and Transportation

The site has a PTAL level of 2 (Poor) and is not within a Controlled Parking Zone. Policy DM TP8 states developments; redevelopments, conversions and extensions will have to demonstrate that the new scheme provides an appropriate level of off-street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. DM TP 7 seeks provision of appropriate cycling facilities.

Policy LP45 of the publication version of the Local Plan requires new development to make provision for the accommodation of vehicles (cycle, 2 wheel and, where applicable, lorry Parking and electric vehicle charging points) in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land.

The scheme is proposed to be a 'car free' scheme with the exception of 3 car parking spaces, one disabled space and two parking spaces for management and maintenance staff. Access to the site would remain as per the extant planning permission, which would be to the east of the existing affordable housing block.

The area suffers from significant parking stress, and a number of objections have been raised by neighbouring occupiers on Norcutt Road regarding the current parking situation and the proposal. The Transport Assessment states that the extant permissions for office use and affordable housing would generate a substantially higher level of trip generation and parking pressure than the proposal for student accommodation.

The site is located within walking distance to the St Mary's University Strawberry Hill Campus (approximately 25 minutes), however as the application is not being brought forward solely in conjunction with St Mary's University, the scheme cannot guarantee that the students will be attending this university. The submitted Transport Assessment is based on the students attending SMU; the impact of students attending other universities out of the Borough has not been considered and would likely to generate increased car ownership in an area at maximum capacity.

The fact that the roads are at capacity does not prevent car ownership, it would only result in displaced vehicles looking further afield for parking and therefore moving the parking problem to a larger area. Whilst the applicant has stated that the students would be prevented from owning a car in the student management plan, there is no way of enforcing this in practise.

Policy DM TP7 states that new development should provide appropriate cycle access and sufficient, secure cycle parking facilities. The drawings indicate that secure cycle storage for 32 cycles will be provided in excess of standards.

Concerns have been raised regarding construction vehicles and the impact on Norcutt Road, it is considered that a Construction Method Statement could be requested via a condition if the application was recommended for approval.

Amenity Impact

Policy DM DC5 of the DMP 2011 and emerging policy LP8 of the publication version of the Local Plan requires that developments do not cause harm to neighbouring amenities in terms of daylight/ sunlight, outlook, privacy, noise and disturbance.

Given the proximity of the development to the flats at Alcott House, 8.5 metres at the pinch point, the proposal is most likely to affect this building.

The site is located to the north of Alcott House; therefore there will be no loss of sunlight to these flats. The submitted Sunlight/ daylight assessment identifies some loss of daylight to the ground floor flats, but concludes in relation to BRE guidelines, Alcott House would overall still receive good levels of daylight . Furthermore given that the siting of the proposed building in relation to Alcott House would be virtually the same as the previously approved affordable housing scheme, it would therefore maintain the status quo in terms of outlook, sunlighting and daylighting. On the southern façade of the building facing Alcott House, the windows have also been angled to prevent overlooking into neighbouring windows.

The proposal has been designed to ensure that any future development at the adjacent Greggs site to the west is not compromised by the scheme.

Concern has been raised about noise and disturbance in relation to the proposed use as student accommodation. Whilst it is noted that the development is in a residential area, the site is located at the end of the street and with the exception of the block of flats, is not in close proximity to the houses.

Living Standards

The building would be set out in 'cluster flats' consisting of 4-6 en-suite bedrooms with a shared living room/ kitchen area. The flats vary in size from 97sqm for a 4 bedroom flat to up to 144sqm for the largest 6 bedroom flat. The smallest bedroom is 10.55sqm in area.

The adopted standards for C3 accommodation are not applicable for student accommodation and there are no national standards, however there is some concern that without the agreement that the student accommodation will meet the needs and standards of a local university, there is no confirmation that the university's standards have been met.

There is one lift proposed but there is no detail as to whether any units can accommodate wheelchair users (there is only one turning circle shown on the ground floor WC which overlaps with the basin). Furthermore no details have been provided as to proposed rents to ensure it will be affordable for students.

Energy and Sustainability

London Plan Policy 5.2 Minimising Carbon Dioxide Emissions states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy. The Mayor's Sustainable Design and Construction SPG states that a 35% reduction in carbon dioxide emissions (in relation to Part L Building Regulations 2013) needs to be achieved. Policy 5.2 further states that carbon dioxide reduction targets should be met on-site or where clearly demonstrated this is not possible the shortfall may be provided off-site or through a cash-in-lieu contribution to secure savings elsewhere.

Policies CP 1 set out that development will be required to conform to the Sustainable Construction checklist. Policies CP2 and DM SD 2 set out that the council will seek to reduce its carbon dioxide emissions and require the evaluation, development and use of decentralised energy in development. CP 2 seeks an increase in the use of renewable energy by requiring all new development to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible by promoting its use in existing development. This is supported by DM SD 2 which seeks to maximise micro-generation of renewable energy. DM SD 2 further requires provision to be made for future connection to a local energy network should one become available.

The proposal would include the installation of photovoltaics and the development would seek to achieve a reduction of 38% improvement over the carbon emissions requirements of Part L 2013 which would comply with the standards set out in the Local Plan.

The submitted BREEAM Preliminary Assessment shows that the new development would achieve a score of 737% which equates to a rating of 'Excellent'.

In relation to Sustainable Drainage Systems (SuDs), the scheme is proposed to achieve 50% attenuation of the undeveloped site's surface water run-off.

Railway Impacts

Given the location adjacent to the railway line, Network Rail have commented on the application providing information for the applicant should the application be approved.

Trees

The site has no trees of significance; there is a belt of trees that have developed on the railway embankment that soften the view from the playing fields of the current site and the large block of flats behind (No. 73). If these trees are lost then it would have an impact on the view from the adjacent playing fields. If the application was recommended for approval, it is considered that tree protection details to demonstrate that the off-site trees can be protected and retained could be conditioned.

Conclusion

1. In the absence of a wider growth strategy for an existing local institution and in the absence of a legal agreement to secure the application site to that institution, the scheme fails to demonstrate that there is a local need for student housing. Given this the proposal would fail to comply with policies DMH05 of the Development Management Plan (2011) and LP37 of the Local Plan (2017).
2. In the absence of an agreement linking the site to a local institution and due to the site's restricted access and local parking conditions, the development would fail to provide sufficient off-street parking and would result in an unacceptable impact on on-street parking conditions and local traffic conditions. The proposal would therefore fail to comply with policy DMTP8 of the Development Management Plan (2011) and LP45 of the Local Plan (2017).

REASONS: AS PER CAPS + DN