

PLANNING REPORT

Printed for officer by
Ms Kerry McLaughlin on 25 October

Application reference: 17/3585/FUL

HAMPTON NORTH WARD

Date application received	Date made valid	Target report date	8 Week date
29.09.2017	18.10.2017	13.12.2017	13.12.2017

Site:

6 Morland Close, Hampton, TW12 3YX, Proposal: Change of use to HMO for 11 tenants).

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

APPLICANT NAME

Ms Candice Jagjiban 6 Morland Close Hampton TW12 3YX AGENT NAME

DC Site Notice: printed on 25.10.2017 and posted on 03.11.2017 and due to expire on 24.11.2017

Consultations:

Internal/External:

Consultee LBRUT Transport 14D POL Expiry Date 08.11.2017 08.11.2017

Neighbours:

7 Morland Close, Hampton, TW12 3YX, - 25.10.2017

1 Morland Close, Hampton, TW12 3YX, - 25.10.2017

15 Morland Close, Hampton, TW12 3YX, - 25.10.2017

3 Morland Close, Hampton, TW12-3YX, - 25.10.2017

5 Morland Close, Hampton, TW12 3YX, - 25.10.2017

4 Morland Close, Hampton, TW12 3YX, - 25.10.2017

2 Morland Close, Hampton, TW12 3YX, - 25.10.2017

10 Morland Close, Hampton, TW12-3YX, - 25.10.2017

8 Morland Close, Hampton, TW12 3YX, - 25.10.2017

9 Morland Close, Hampton, TW12 3YX, - 25.10.2017

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

Development Management

Status: GTD Application:84/0218

Date:04/04/1984 Erection of a single storey extension to side and rear of dwelling house.

Development Management

Status: GTD Application:87/0097

Date: 04/03/1987 Erection of a first floor side and single storey rear extension.

Development Management

Status: PCO Application: 17/3585/FUL

Date: Change of use to HMO (for 11 tenants).

Building Control

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Deposit Date: 11.08.2003

FENSA Notification of Replacement Glazing comprising 8 Windows and 0 Doors. Installed by Hampton Hill Windows. FENSA Member No 11220.

Installation ID 953742. Invoice No 0300009

Reference: 03/5292/FENSA

Building Control

Deposit Date: 18.12.2007 4 Windows

Reference: 08/FEN00003/FENSA

Building Control

Deposit Date: 25.09.2009 Installed a Gas Boiler

Reference: 09/FEN01107/GASAFE

Building Control

Deposit Date: 23.11.2010 1 Door Reference: 11/FEN00518/FENSA

Building Control

Deposit Date: 22.02.2012 1 Door Reference: 12/FEN00833/FENSA

Building Control

Deposit Date: 01.05.2012

One or more new circuits Special Location Containing Bath ShowerPool or

Sauna Replacement consumer unit House Dwelling

Reference: 12/NAP00171/NAPIT

Enforcement

Opened Date: 10.10.2017

Enforcement Enquiry

Reference: 17/0528/EN/UCU

The determination of this application falls within the scope of Officer delegated powers - YES / NO I therefore recommend the following: 1. REFUSAL 2. **PERMISSION** FORWARD TO COMMITTEE 3. YES* M NO This application is CIL liable (*If yes, complete CIL tab in Uniform) YES* ✓ NO This application requires a Legal Agreement (*If yes, complete Development Condition Monitoring in Uniform) YES This application has representations online (which are not on the file) YES This application has representations on file Case Officer (Initials): I agree the recommendation: Team Leader/Head of Development Management/Principal Planner Dated: .. 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:

Recommendation:

The following table will popular Uniform	e as a quick check by running the template once items have been entered in							
SUMMARY OF CONDITIONS AND INFORMATIVES								
CONDITIONS								
INFORMATIVES								

17/3585/FUL

6 Morland Close, Hampton TW12 3YX

Site and Surrounding

The site currently comprises a detached dwellinghouse (C4 Use Class) located with frontage to the northern end of a cul-de-sac forming part of Morland Close.

The site is not situated in a conservation area and does not benefit from any other designation. The site is situated with Character Area 12 of the Hampton Village Planning Guidance Document.

Proposal

The proposal is for the change of use from a dwellinghouse of not more than six residents as a House in Multiple Occupation (HMO), to a House in Multiple Occupation (HMO) for 11 tenants.

The HMO will comprise 8 bedsits.

History

No relevant history.

Main development plan policies:

Core Strategy Policies:

CP1 - Sustainable Development

CP2 - Reducing Carbon Emissions

CP3 - Climate Change - Adapting to the Effects

CP5 - Sustainable Travel

CP7 - Maintaining and Improving the Local Environment

CP14 - Housing

CP15 - Affordable House

Development Management Plan:

DM SD3 - Retrofitting

DM HO1 - Existing Housing (including conversions, reversion and non self-contained accommodation)

DM HO4 - Housing Mix and Standards

DM HO6 - Delivering Affordable Housing

DM TP1 - Matching Development to Transport Capacity

DM TP2 - Transport and New Development

DM TP6 - Walking and the Pedestrian Environment

DM TP7 - Cycling

DM TP8 - Off Street Parking - Retention and New Provision

DM DC1 - Design Quality

DM DC5 - Neighbourliness, Sunlighting and Daylighting

Local Plan:

LP1 - Local Character and Design Quality

LP8 - Amenity and Living Conditions

LP34 - New Housing

LP35 - Housing Mix and Standards

LP36 - Affordable Housing

LP37 - Housing Needs of Different Groups

LP38 - Loss of Housing

LP44 - Sustainable Travel Choices

LP45 - Parking Standards and Servicing

Supplementary Planning Documents / Guidance Residential Development Standards SPD (2010) Sustainable Construction Checklist SPD (2011) Affordable Housing SPG (2014) Hampton Village Planning Guidance SPD

Public and Other Representations

One objection has been received from Cllr Geoffery Samuel. The material planning considerations raised are summarised as follows:

- Incompatible with declared policy of the Council to protect character of the borough
- Removes a family house of a kind needed in the borough
- The scheme is incompatible with the housing mix in Morland Close
- The proposal would result in increased traffic and parking stress
- The scheme represents overdevelopment
- The scheme would not meet the appropriate refuse requirements, including for collections

In light of the above material planning considerations, Cllr Samuel has requested that the application be put forward to the Planning Committee; should the proposal be recommended for approval.

One objection has been received from *The Hampton Society*; however no material planning considerations were raised.

One objection has been received from Rectory Management Ltd who oversee restrictive covenants for the site. The materials planning considerations raised are summarised as follows:

- Increased traffic generation and parking stress
- Increased noise and disturbance to existing occupants within the locality

Two objections have been received from All Saints Hampton Church of England Parish. The material planning considerations raised are summarised as follows:

- Incompatible with declared policy of the Council to protect character of the borough
- Removes a family house of a kind needed in the borough
- The scheme is incompatible with the housing mix in Morland Close
- The proposal would result in increased traffic and parking stress
- The scheme represents overdevelopment
- The scheme would not meet the appropriate refuse requirements, including for collections

One objection has been received from 3RD Chillerton Residents Association. The material planning considerations raised can be summarised as follows:

- The proposals are incompatible with the existing housing mix of the locality
- The scheme would result in increased parking stress

Objections from 122 properties have been received. The material planning considerations raised are summarised as follows:

- Proposal is harmful to the established character
- The proposal represents overdevelopment of the site and surrounding locality
- The application site is in an inappropriate location for high density residential development
- The proposed housing mix is not compatible with the surrounding development
- The proposal would not meet the require parking standards
- The area already has a very low PTAL rating of 1B
- The scheme incorporates poor living conditions
- The scheme does not propose appropriate standard of accommodation

- The scheme would be detrimental to the neighbouring amenity of surrounding occupants
- The scheme would result in increased noise and disturbance to surrounding dwellings
- The proposed development would not meet the required refuse/recycling requirements
- Concerns raised regarding the impacts of the proposals on existing biodiversity and ecology of the locality

A petition to London Borough of Richmond upon Thames objecting to the proposal has been received with 250 signatures enclosed. Planning officers have been advised that Cllr Samuel intends to present the petition to Council on the 28th of November, 2017. The material planning considerations raised within the petition are as follows:

- The proposed conversion to HMO will be detrimental to the character of the area
- The propose will negatively impact the quality of the local environment

Amendments

A revised application form and proposed floor plans were received amending the description of proposal to include 11 occupants.

Professional comments

Key Issues

The main issues for consideration are as follows:

- Principle of Change of Use
- Residential Development Standards
- Parking and Transport Considerations;
- Design and Siting;
- Impact on Existing Residential Amenity.

Change of use

Policy CP7 states that development should recognise distinctive local character.

Policy DM HO1 of the Development Management Plan and Policy LP38 (B) of the Submission Local Plan set out criteria to assess whether properties are suitable for conversion and the design considerations. Policy DM HO1 states that existing housing should be retained. Redevelopment of existing housing should normally only take place where:

- It has been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and if this is the case:
- 2. The proposal improves the long term sustainability of buildings on the site; and
- 3. The proposal does not have an adverse impact on local character; and
- The proposal provides a reasonable standard of accommodation, including accessible design

Whilst it is noted that Policies DM HO 1 and LP 38 do not distinguish so far as the number of units, nor the type of house; paragraph 5.1.7 states that it must be recognised that only certain types of property are suitable for conversion and that there are some areas where conversions would be incompatible with the existing character of the area or lead to unacceptable parking conditions. In considering in principle the suitability of a property for conversion the Council will take into account:

- The size of the property and its physical characteristics, including layout and size of rooms;
- On-street parking conditions; the adequacy of bus and rail transport and on-site parking proposed

- The amount of off-street parking which would be appropriate and its location, which must not unduly affect the amenities of adjoining premises:
- The location of the property and the need to protect the established character of existing residential areas, including that of specific roads
- The effect of the amenities of adjoining premises
- The extent to which the property contributes to meeting specific community needs in accordance with policy DM HO5

Policies CP1, CP14 and LP37 encourage housing choice. However, in accordance with DM HO1 and LP 38 (B), however it is necessary to distinguish as to whether or not the locality is an appropriate location for a HMO; generally smaller units are encouraged in main centres and areas of mixed use. Morland Close and the surrounding locality is generally characterised by single family occupied dwellings. Policy DM HO4 states that development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The importance of the housing mix being appropriate to the location is further reiterated within emerging policy LP35 of the submission Local Plan.

The proposal is for an HMO, providing nine bedrooms for 11 tenants outside of a town centre location and is therefore contrary to Development Management Plan Policy DM HO4 and LP35. Whilst HMOs are considered a valued source of cheaper accommodation for young and transient groups in the population who have not reached a stage where they can or want to buy, for people who are unable to gain access to other forms of housing and for people who would otherwise be homeless, given the existing housing mix contributes strongly to the character of the surrounding locality, the approval of this proposed HMO and any subsequent applications for non-family housing would unacceptably erode the character of the area, which comprises purely family houses. The scheme would thereby fail to comply with the aims and objectives set out in the above policies. In addition, the intensification of use of the dwelling would adversely impact on the residential amenity of nearby occupants and cause increased parking stress to the detriment of the existing highway network.

It is noted that one of the contributing factors and indeed more prejudiced items for two Appeals (ref 12/2861/FUL (63 Prospect Crescent) and 10/3578/FUL (30 Prospect Crescent)) for the conversion of existing dwelling into two self-contained flats that were dismissed is the cumulative impact of such conversions that would erode the character of the area. Whilst this application relates to a HMO and is in another location in the Borough, the principal of the change of use and its impact on the character of the area is considered comparable to the above Appeals.

The Inspector noted in one of the Appeals (ref 12/2861/FUL), 'The division of larger homes....can affect the character of an area, through factors such as increased demand for car parking and infrastructure and external alterations to dwellings and their setting. The approval of similar schemes would cumulatively alter the area's character.

'Allowing this Appeal would make it more difficult to resist further planning applications for similar developments and I consider that their cumulative effect would exacerbate the harm...' [Application reference 12/2861/FUL]

Another Inspector commented 'This change of use could be repeated elsewhere and would erode the character of the area' [Application reference 10/3578/FUL]

In light of the above, it is considered that the proposed HMO would be incompatible with the surrounding locality and would detrimentally impact the character of the area which is dominated by family housing. Furthermore, the proposed loss of a family dwelling house is contrary to Policy DM HO4 of the Development Management Plan (2011) and LP35 of the

submission Local Plan. Therefore, an in principle objection is raised with regard to the proposed change of use to a *sui generis* HMO for 11 tenants in this location.

Residential Development Standards

Policy DM HO4 of the Development Management Plan and LP 35 (C and D) of the Local Plan, as well as the Residential Development Standards SPD require all new housing development to comply with external and internal space standards. Whilst the proposal is for a HMO, it is considered that residential development standards will be applicable.

Whilst there are no specific standards set out in planning guidance for HMOs; the SPD on 'Residential Development Standards' states the footprint and room sizes should adequately reflect the use and type of accommodation. In all dwellings, the main bedroom (double) should be 12sqm; at least 2.6m wide and any single bedrooms should be at least 7sqm. Additionally, since 1 October 2015 the Council has been applying nationally described space standards which are to be applied alongside relevant Council policy. The minimum standards are outlined below:

- A single bedroom should be at least 7.5sqm and 2.15m wide
- A double should be 11.5sqm and 2.75m wide
- Head height should be at least 2.3m for a minimum of 75% of the gross internal floor area
- Suitable storage space to be incorporated into units
- Communal gardens to be sheltered from roads and not overlooked from habitable rooms.

The national space standards does not identify a minimum gross internal floor area for a dwelling with 8 bedrooms, however it is considered that the maximum standard would require the minimum GIA as set out below (as relevant to the scheme):

6 bed (8 person / two storey dwelling) – 132 sgm

Table 1 - Minimum gross internal floor areas and storage (m2)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
6b	. 7p	116	123	129	4.0
	8p	125	132	138	

Furthermore, the Council's Residential Development Standards SPD requires the provision of 70sqm minimum external amenity space for dwellings of 3 or more bedrooms.

The proposed plans show the GIA would be approximately 156.3sqm, which exceeds the minimum standard set out within the NDSS. The proposed layout does not alter the first floor. At ground floor two additional bedrooms are added - a reception room is converted to a living room; however there is no longer a dining area/room. There are no facilities such as kitchenettes shown within the bedrooms of the proposed plans. Overall there appears to be a loss of shared facilities. The scheme retains kitchens, bathrooms, and a dining space. The proposal includes one double bedroom on the first floor with an internal area of 15sqm, which exceed the Council's minimum standards and is considered acceptable. Between the 7 other bedrooms across the ground and first floor, the proposed floor areas range from 7.2sqm – 11.7sqm. There are three bathrooms, a master kitchen and secondary kitchen and dining room. The master kitchen, secondary kitchen and separate dining room are considered to be of an adequate size, with a combined floor area of approximately 38sqm.

Policies DMHO4 and LP 38(C and D) identify that amenity space for all new dwellings, including conversions should be private, usable, functional and safe; easily accessible from

living areas; orientated to take account of need for sunlight and shading; of a sufficient size to meet the needs of the likely number of occupiers; and accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

No details have been submitted regarding amenity space. It is noted that there is some outdoor amenity space to the rear of the existing building, which was identified upon conducting a site visit.

In light of the above, whilst the proposed bedrooms would meet the minimum standards required by the NDSS it must be noted that these are minimum standards for new residential dwellings and are to be applied alongside relevant Council Policy. As the occupancy of the proposed HMO would be 11, it is considered that Policies DM HO4 and the Residential Development Standards SPD (which state that double bedrooms should provide a minimum of 12sqm) would be a more suitable minimum standard to apply. Furthermore, given that it is necessary to provide room sizes which adequately reflect the use and type of accommodation, the provision of 3no. double bedrooms below the Council's minimum standard, it is considered that the proposed HMO would not provide an appropriate standard of accommodation. Such concern is exacerbated due to the intensification of the use and high level of occupancy proposed.

The proposed conversion, by reason of its inadequate floorspace and layout, is not considered to provide a suitable standard of accommodation to the detriment of the residential amenity of future occupants. The scheme would fail to accord with the aims and objectives of DMP Policy DM HO4 and Local Plan Policy LP 35(C and D).

Sustainability

Policy DM SD3 of the DMP and Policy LP 22 of the Local Plan outline that high standards of energy and water efficiency in existing developments will be supported wherever possible through retrofitting. Proposals for conversion will be encouraged to comply with the Sustainable Construction Checklist as far as possible.

Whilst it would have been preferable had the scheme incorporated measures to improve the sustainability benefit of the property, given the limited internal alterations proposed for the conversion, though regrettable, it is not considered there to be sufficient reason to seek further sustainability improvement in this instance.

Lifetime Homes

Core Strategy Policy CP14 requires all housing to be built to Lifetime Homes standards.

Similarly to the above; given the limitations of the conversion, it is not considered to be suitable the scheme will meet Building Regulations M4(2) 'accessible and adaptable dwellings'

Parking and Refuse

The application site is situated in PTAL 1b (very low accessibility) and there is no parking restriction via CPZ in the immediate locality.

DMP Policy DM TP7 and Local Plan Policy LP 45 seek the provision of appropriate cycle access and sufficient, secure cycle parking facilities, outlining that the Council will ensure that new development or schemes do not adversely impact on the cycling network or cyclists and provide appropriate cycle access.

Policy DM TP8 and LP 45 state that 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. In addition to the above, Local Plan Policy LP 45 outlines that provision of acceptable off-street parking will be achieved by:

1. Requiring new development to provide for car, cycle, 2 wheel parking

- 2. Resisting the provision of front garden car parking unless it can be demonstrated that:
 - a. There would be no material impact on road or pedestrian safety;
 - There would be no harmful impact on the character of the area, including the streetscape or setting of the property, in line with the policies on Local Character and Design; and
 - c. The existing on street demand is less than available capacity

No detail has been submitted regarding existing or proposed parking provision. However, a site visit carried out by planning officers identified that the application site is serviced by two on-site parking spaces in the form of a garage and hardstanding area to the front of the site large enough for 2no. parking spaces. Via carrying out a site visit it has similarly been identified that there is existing forecourt/on-street parking in situ within this section of Morland Close. However it is to be noted that given the existing family-residential nature of the locality, it did not appear that there was a specific intensification of on-street parking serving any one individual dwelling unit. Whilst the scheme would provide two off-street parking spaces, no further information has been submitted to demonstrate the proposal would not adversely impact on on-street parking conditions and local traffic conditions. The application has been subject to review by Council's Transport Officer, and it has been advised that in order to protect the existing on-street parking conditions and local traffic conditions, any approval would require a S106 legal agreement restricting access to resident and visitor parking permits, should any future CPZ be implemented.

Given the proposed intensification of use of the property to potentially 11 car-reliant tenants, location of the site (PTAL 1b), distance to public transport combined with existing parking situation on Morland Close and the absence of information to demonstrate the proposal would not adversely impact on existing on-street parking conditions and local traffic conditions, the scheme is considered to generate increased demand for on-street car parking and congestion, to the detriment of the free flow of traffic and the condition of general safety within the site and the existing highway network. It is also noted that, in accordance with the planning inspector's findings within the appeal decision relating to Application reference 12/2861/FUL, the increased demand for car parking and infrastructure would contribute to the deterioration of the character of the surrounding locality.

In light of the above, it is considered that insufficient information has been submitted alongside the application to enable a full and robust assessment as to the impacts of the proposed conversion to HMO with 11 tenants upon highway safety and the local parking conditions of the application site and surrounding road network and the potentially harmful impact on the character of the area, including the streetscape and setting of the property in accordance with the policies on Local Character and Design. Furthermore, In the absence of a binding legal agreement to restrict access to residential parking permits, should a CPZ be implemented at any time, the proposed development would result in increased congestion and demand for on-street parking, to the detriment of the free flow of traffic and highway safety. The proposed variation is therefore contrary to Policy DM TP2 of the Development Management Plan (2011) and emerging Policy LP45 of the Local Plan (Publication Version).

The Council's Residential Development Standards require that secure storage be provided on-site for refuse and recycling bins. No information has been submitted detailing proposed provision of refuse and recycling on site. It is therefore considered that the proposed development would not provide an acceptable level of refuse and recycling storage provision for the proposed use.

Design and Siting

The NPPF attaches great importance to the design of the built environment, stating "good design is a key aspect of sustainable development...and should contribute positively to making places better for people". It stresses the need to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings and smaller developments. While it states that local authorities should not impose architectural styles or particular tastes, it reinforces that it is important to consider local character and distinctiveness.

Core Strategy Policy CP7 states that new development should recognise distinctive local character. The supporting text in 8.2.1.3 states that the Council will support new development that has evolved from an understanding of the site, the impact on its surroundings and its role within the wider neighbourhood.

Development Management Plan DM DC1 and Local Plan Policy LP1 outline that development must be inclusive, respect local character including the nature of the particular road, and connect with, and contribute positively to its surroundings based on a thorough understanding of the site and its context.

No objections are raised with regard to the proposed window sited to the southern side elevation at ground floor level, which is considered to be of a scale and form which would remain proportionate to the host dwelling.

Residential Amenity of Neighbouring Properties

Policies DM DC5 and LP8 outline that in considering proposals for development the Council will seek to protect the adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. The Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings and that adjoining land or properties are protected from overshadowing in accordance with established standards.

The application site adjoins Hampton Common to the north, with no. 7 Morland close sited to the south. The existing building is a detached dwelling which would share its common boundaries with 1no. adjacent residential property.

Notwithstanding the above, the intensification of use of the property through the conversion of the dwellinghouse to a HMO for 11 residents is considered to alter the character of the existing dwellinghouse and increase car and cycle parking and refuse requirements, as well as higher levels of comings and goings at a greater variance of hours. Although the building would remain as residential accommodation, it is considered that the proposals, by reason of their high level of occupancy would negatively impact the residential amenity of neighbouring occupiers with regard to increased general and vehicular noise and disturbance.

Affordable Housing

Policies CP15 of the Core Strategy, DMHO6 of the Development Management Plan and LP36 of the Local Plan require contributions to affordable housing from all small sites; further details are set out in the Affordable Housing SPD.

Generally this is applied to all proposals creating new residential units, even where created through conversions and if there is internal reconfiguration of existing residential. National and London-wide planning guidance on the private rented sector advise that the distinct economics of the sector relative to mainstream 'build for sale' market housing should be recognised. It is noted that the 'build to rent' schemes cannot compete on an equal footing with speculative 'build for sale' schemes. The Council's local evidence of affordable housing

need remains substantial. In this borough, small sites cumulatively make a significant contribution to housing supply. This is also set out in the Pre-Publication Local Plan Affordable Housing Policy LP 36, which the adoption and use of for determining planning applications and development management purpose was agreed following a report to the Councils Cabinet on 23 June 2016.

Notwithstanding the above, given the existing residential use and that this scheme would not result in an additional residential unit, an affordable housing contribution is not sought, as DMHO6 and LP36 are not applicable to this proposal.

Recommendation

Refuse for the following reasons:

Character of Area

The conversion of the property to a House in Multiple Occupation would result in the loss of a family home that would erode the established residential character of the immediate area. The intensification of use as a result of the conversion would harm the amenity of surrounding neighbours. The proposal is therefore contrary, in particular, to policy CP7 of the Core Strategy (2009) and policies DM HO1 and DM DC5 of the Development Management Plan (2011) and LP 38 of the Submission Local Plan (2017).

Residential Amenity

The proposed development, by reason of the intensification of use of the property is considered to alter the character of the existing dwellinghouse and increase car and cycle parking and refuse requirements, as well as higher levels of comings and goings at a greater variance of hours. As such, the scheme would negatively impact the residential amenity of neighbouring occupiers with regard to increased pollution and noise and disturbance. The scheme would be contrary to, in particular, Policies CP7 of the Core Strategy (2009), DM DC 5 of the Development Management Plan (2011) and LP8 of the Local Plan (2017).

Residential Development Standards

The proposal, by reason of its inadequate internal floor space and unacceptable layout represents over-intensification and over-development of the site that would result in substandard living conditions, to the detriment of the amenities of future occupiers. The development would thereby be contrary to, in particular, policies CP7 and CP14 of the Core Strategy, policies DM HO4 and DC1 of the Development Management Plan; policy LP8, LP 35 of the Local Plan (Publication Version for Consultation) (2017); Supplementary Planning Document 'Residential Development Standards' and 'Design Quality' and the Technical Housing Standards - Nationally Described Space Standard (March 2015).

Transport and Parking

In the absence of a parking survey or similar sufficient information to demonstrate there to be sufficient capacity in the surrounding roads to accommodate the likely increased demand for kerbside parking, the proposal would be likely to generate increased on-street car parking and congestion, to the detriment of free flow traffic and conditions of general safety and the residential amenities of the area. Furthermore, In the absence of a binding legal agreement to restrict access to residential parking permits, should a CPZ be implemented at any time, the proposed development would result in increased congestion and demand for on-street parking, to the detriment of the free flow of traffic and highway safety. The proposal is therefore contrary to, in particular, policies DM TP2 and DM TP8 of the Development

Management Plan (2011), LP44 and LP45 of the Submission Local Plan (2017) and Policy CP5 of the Core Strategy (2009) and the National Planning Policy Framework.

Refuse and Recycling

In the absence of satisfactory refuse and recycling provision, the proposed development would fail to ensure that waste is managed in accordance with the waste hierarchy to reduce, reuse or recycle waste as close as possible to where it is produced. As such it is contrary to Policy LP24 of the Local Plan (2017) and the SPD on Refuse and Recycling Storage (2015).