

Ward:	Ruxley Ward
Site:	36, 38 & 40 Rowden Road, West Ewell, Surrey, KT19 9PW
Application for:	Demolition of Nos 36, 38 & 40 Rowden Road, and garage block at Crane Court; and the erection of 12no new dwellings (including 8no 1 bedroom flats, 2no 2 bedroom flats, and 2no 3 bedroom houses); including associated landscaping, access and parking
Contact Officer:	Ginny Johnson

1 Plans and Representations

- 1.1 The Council now holds this information electronically. Please click on the following link to access the plans and representations relating to this application via the Council's website, which is provided by way of background information to the report. Please note that the link is current at the time of publication, and will not be updated.

Link: <https://eplanning.epsom-ewell.gov.uk/online-applications/applicationDetails.do?activeTab=makeComment&keyVal=Q21R7LGYGNL00>

2 Summary

- 2.1 The proposal seeks the demolition of three dwellings and a garage block and the erection of two houses and ten flats, with associated parking, landscape and private amenity space. The proposal is an entirely social housing scheme.
- 2.2 The loss of the garages is considered acceptable in this case. 10 of the 24 garages are let and the remaining 14 are vacant. Survey results demonstrate that there is capacity within the surrounding roads to accommodate any displaced garage users, as a result of the proposed development. SCC Highways has no objection to the proposal, subject to conditions being attached to any planning permission granted.
- 2.3 Paragraph 11d of the NPPF is engaged via footnote 7 in circumstances where Local Planning Authorities cannot demonstrate a five year housing land supply. The practical application and consequence of this is that unless a site is located in an area or involves an asset of particular importance that provides a clear reason for refusal, then planning permission must be granted, unless it can be demonstrated that any adverse impacts demonstrable outweigh the benefits, when assessed against the NPPF as a whole.
- 2.4 Under the Standard Methodology, Epsom and Ewell Borough Council's housing need figure is confirmed as 579 units per annum. This then rises to 695 per annum, due to the measures imposed by the Housing Delivery Test, for under delivery in recent years. Currently, the Local Planning Authority cannot demonstrate a five-year supply of housing land. The evidence shows that the Borough has a significant lack of housing land supply that is available, developable and deliverable.
- 2.5 In considering the facts of this proposal, the scheme benefits are considered to comprise:
- Provision of 12 social housing dwellings, helping to address the Council's housing shortfall

- Ecological enhancements
- Employment generation, during the scheme's construction phase.

- 2.6 The adverse impacts are considered wide ranging in this case, specifically in relation to the design and impact of the proposed block of flats.
- 2.7 The three terraced houses proposed to be demolished, form part of a terrace of four. The demolition of the three terraces would result in uneven break in the original terrace and street pattern, leaving 34 Rowden Road as a loose fragment. The proposed block of flats, by virtue of its height, mass, bulk and design, would be at odds with no. 34, left as an awkward, disjointed remaining end of terrace house.
- 2.8 The proposed block of flats comprise a rectangular shaped building, with poor design features, including (but not limited to) attached balconies, supported from the ground by a scaffolder structure. The proposed material and fenestration pattern proposed would relate poorly to the established environment, with larger windows and expansive flat faces of brick and zinc, contrasting to the modest scale of detail, fenestration and roof form of existing houses.
- 2.9 The height, width, mass and poor design of the proposed block of flats also adversely impacts the visual amenity of the immediate street scene. It would stand out unsympathetically in local street views, contrasting with the established two-storey dwellings, with pitched roofs.
- 2.10 As a result of its excessive height, width, mass and poor design features, the proposed block of flats would harm the neighbouring amenity enjoyed at 34 Rowden Road and 42 Rowden Road, by means of overbearing and loss of outlook. The proposed balconies to the rear of the proposed block of flats give rise to issues of overlooking and loss of privacy at these neighbouring dwellings.
- 2.11 Issues of overlooking into the rear gardens of 14 and 16 Bourne Way are raised as a result of the proposed balconies on the rear elevation of the proposed block of flats.
- 2.12 Officers acknowledge that there is very limited vegetation within the Site at present, given that it comprises built development and hardstanding. This proposal seeks to maximise built form and hardstanding, leaving limited room and scope for considered tree planting and landscaping. This results in a scheme that fails to integrate the landscape and the buildings.
- 2.13 In considering the planning balance, the adverse impacts of this development are considered to outweigh the benefits in this case, when considering the Framework as a whole. Officers recommend this application for refusal.

3 Site description

- 3.1 The Application Site ('Site') measures approximately 0.17 hectares in size and comprises three dwellings, 24 single-storey garages and hard standing. It is located to the south of Rowden Road and to the north of Crane Court and Hogsmill Way.
- 3.2 The three dwellings include 36, 38 and 40 Rowden Road. These are two-storeys in height and form part of a terrace of four dwellings. These are set back from Rowden Road by driveways.
- 3.3 The 24 garages are located within an area of hardstanding, to the south of the three dwellings. These are accessed off Crane Court, which is an access road off Hogsmill Way.

- 3.4 To the north of the Site is a Youth Centre. Typically, however, the Site's surrounding area is residential in character, comprising two-storey terraced houses, with similar designs, and 1960s three-storey flatted developments.
- 3.5 The Site is well located to support sustainable development with a number of services within walking/cycling distance. The nearest bus stop is located directly opposite Crane Court, approximately 10m to the south on Hogsmill Road, allowing for access to destinations including Epsom, Kingston and North Cheam on a regular basis, on both weekdays and weekends. Tolworth Railway Station is located approximately 1km north of the site, facilitating services to London Waterloo, Wimbledon, Earlsfield and Clapham Junction frequently during peak hours.
- 3.6 The Site is not listed, nor does it fall within a Conservation Area.
- 3.7 The Site is in Flood Zone 1 (low probability of flooding) and partly within a Critical Drainage Area.

4 Proposal

- 4.1 This application seeks full planning permission for the demolition of three dwellings and a garage block and the erection of two three-bedroom houses, eight one-bedroom flats and two two-bedroom flats, with associated parking, landscape and private amenity space.
- 4.2 Details of the proposal are provided below:
- The proposed flatted block measures approximately 8.8 metres in height, 17 metres in depth and 21.2 metres in width
 - The proposed houses measure approximately 9.6 metres in height, 8.7 metres in depth and 11.5 metres in width. These benefit from rear gardens, measuring approximately 10.1 metres in length.
- 4.3 Vehicular access to the Site is proposed via the existing access from Hogsmill Way. This road provides access to the Site for vehicles and pedestrians.

5 Comments from third parties

- 5.1 The application was advertised by means of letters of notification to 43 neighbouring properties. 65 letters of objection have been received regarding:
- Design
 - Density
 - Loss of sunlight
 - Adverse impact on neighbouring amenity
 - Traffic/parking implications
 - Noise and disturbance
 - Refuse and waste
 - Security

- 5.2 A Site Notice was displayed and the application advertised in the local paper.

6 Consultations

- Surrey County Council (Highways) (06.04.2020): no objection, subject to conditions
- Thames Water (31.12.2019): no objection
- Surrey County Council (Archaeology) (16.01.2020): no objection
- Fire & Rescue: compliance with Fire Safety Order
- EEBC Ecology: no objection, recommend Conditions

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- EEBC Tree Officer: no response received
- SCC LLFA (08.01.2020): objection
- Environment Agency (01.12.2020): no objection

7 Relevant planning history

7.1 There is no recent or relevant planning history pertaining to the Site.

8 Planning Policy

National Planning Policy Framework 2019

Chapter 5	Delivering a sufficient amount of homes
Chapter 9	Promoting sustainable transport
Chapter 11	Making effective use of land
Chapter 12	Achieving well-designed places
Chapter 15	Conserving and enhancing the natural environment

Core Strategy 2007

Policy CS3	Biodiversity and Designated Nature Conservation Areas
Policy CS5	Conserving and Enhancing the Quality of the Built Environment
Policy CS6	Sustainability in New Developments
Policy CS8	Broad Location of Housing Development
Policy CS9	Affordable Housing and meeting Housing Needs
Policy CS16	Managing Transport and Travel

Development Management Policies Document 2015

Policy DM4	Biodiversity and New Development
Policy DM5	Trees and landscape
Policy DM9	Townscape Character and Local Distinctiveness
Policy DM10	Design Requirements for New Developments
Policy DM12	Housing Standards
Policy DM21	Meeting Local Housing Needs
Policy DM22	Housing Mix
Policy DM35	Transport and new Development
Policy DM36	Sustainable Transport for New Development
Policy DM37	Parking Standards

Parking Standards for Residential Development Supplementary Planning Document (2015)

9 Planning considerations

Principle of development

Design

Quality of Accommodation

Neighbouring Amenity

Highways and car parking

Trees and landscaping

Ecology

Flood Risk and Drainage

Presumption in favour of sustainable development

10 Principle of development

- 10.1 Policy CS8 directs new housing development to the defined “Built Up Area” of Epsom and Ewell. Emphasis is given on the re-use of suitably previously developed land for housing. Subject to other policies, planning permission will be given for development within the Built Up Areas, including infilling, redevelopment and conversion.
- 10.2 The Site currently comprises residential properties and garages. The Site is located within the Built Up Area of Epsom & Ewell, considered appropriate for residential development, in line with local planning policy. The Site’s surrounding area is typically residential in character, comprising two-storey terraced houses and three-storey flatted developments. This Site is therefore considered appropriate for residential redevelopment, subject to the acceptable loss of the garages and other material considerations.
- 10.3 A Parking Technical Note accompanies this application, providing information regarding the garages located on the Site and the highway capacity. The Note explains that 10 of the 24 garages are let (although not necessarily occupied by cars), with the other 14 garages being vacant. Survey results demonstrate that the roads within 200m of the Site have available capacity during peak hours to accommodate any displaced garage users as a result of the proposed development, with a minimum available capacity of 77 spaces. In the event of no available spaces on Crane Court, all parking can suitably be accommodated within the local road network. SCC Highways considered this application, formally responding on 06.04.2020, with no objection, recommending conditions, should planning permission be granted.
- 10.4 The loss of the garages at the Site is in this case considered acceptable, subject to planning conditions being attached to any planning permission granted.

11 Design

- 11.1 Policy CS5 sets out that high quality and inclusive design will be required for all developments. Developments should (inter alia) create attractive, functional and safe environments, reinforce local distinctiveness and complement the attractive characteristics of the Borough and make efficient use of land.
- 11.2 Policy DM9 sets out that the Council will seek enhancement of the townscape through new development, particularly those areas with poorer environmental quality and where the character has been eroded or needs improving. Planning permission will be granted for proposals which make a positive contribution to the Borough’s visual character or and appearance.
- 11.3 Concerns have been raised by neighbours regarding the proposed height, mass and bulk of the block of flats and its visual impact on its surroundings. This has been taken into consideration within the assessment of this application.
- 11.4 The accompanying Design and Access Statement (DAS) sets out that the proposed site layout has been carefully considered, taking influence from the position of the established surrounding properties, to preserve the character of the site and its contribution within the local area.
- 11.5 The DAS sets out that the scale of the proposed development is consistent with the immediate surroundings, with a modern architectural aesthetic, designed to complement the range of existing building styles in the vicinity. Proposed materials include:
- Cream stock brick
 - Pigmento brown zinc cladding

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- Aluminium framed door and window sets to match zinc cladding
- Galvanised steel balconies
- Anthracite uPVC rainwater goods

11.6 The accompanying Planning Policy Statement sets out that the proposed block of flats has been designed with the main ridge and eaves heights reflecting that of the immediately adjoining dwellings. The proposed second storey is set back from the ridge line to create subordination. This prevents the building appearing too dominant within the street scene, but allows additional accommodation to be provided.

11.7 An informal meeting was held with the Applicant on 09.12.2020, to discuss the proposal. Following the meeting, an email was received by the Applicant's architect (17.12.2020), providing further design rationale for the proposal. The architect sets out that an important factor to note is that the existing dwellings, identified for removal suffer from subsidence. Concerning the scale of the proposed block of flats, the architect clarified that the aim of the design on the front elevation, is to provide some degree of symmetry, which reflects that found at the neighbouring terrace of dwellings, to the north.

Design and Conservation Officer comments

11.8 The Local Planning Authority's Design and Conservation Officer formally commented on this application, with an objection, which is summarised below.

11.9 The Site faces onto Rowden Road and Crane Court, which is a predominantly residential area, consisting of housing dating from the 1930s to 1960s. Housing adjacent to the Site are two-storeys in height, well set back from the street, resulting in a very low density housing environment.

11.10 The proposed block of flats facing onto Rowden Road requires the demolition of three houses in a terrace of four. This terrace is one of many in the local estate from its earliest phase and to a design that still dominates the environment with the best of the frontages. The proposal would result in an uneven break of the street pattern and leaves the house at the end of the terrace as a loose fragment.

11.11 The proposed new block of flats are bulky, as well as being an additional storey in height (in comparison to surrounding properties), which would relate poorly to nearby terraces (which comprise the same design), especially the remaining property of this terrace, which would no longer relate so well to the streetscape of Rowden Road. The design of the proposed flats also contrasts brutally with the rest of the street, being rectangular, bulky and with external attached balconies, which are supported from the ground like a scaffolder structure, rather than engaging with the body of the building.

11.12 The use of material and fenestration pattern (of the proposed block of flats) relate poorly to the environment. The large windows, with expansive flat faces of brick and zinc are totally out of proportion with the modest scale of detail, fenestration and roof form of the existing houses.

11.13 The proposals for the houses within Crane Court are more responsive to the local townscape, except that in this small court with just two houses, there will be car parking spaces.

- 11.14 There is a lot of car parking spaces proposed, including on the front forecourt of the proposed blocks of flats. This is in a street where there are a considerable number of generously sized front gardens, with fences or hedges on the boundary, retaining some of the Garden City influence that has some effect on the character of the streets. Although some of these have been lost, wider banks of parking should be avoided in front forecourts, where possible.
- 11.15 In conclusion, the LPA's Design and Conservation Officer sets out that as a single proposal that affects part of a terrace, this would be a clumsy and disruptive intervention in the streetscape. It might be marginally improved by including the end of terrace house. But, such a development, even were it of exceptional high quality design, would stand out unsympathetically in local street views. With an area of such consistent residential character, such a dramatic intervention should only be considered in the context of a wider redevelopment.

Officer assessment

- 11.16 The Applicant engaged in formal pre-application discussions with the Local Planning Authority. Whilst ordinarily pre-application discussions are confidential, in this case, the Applicant has included the pre-application response as part of this application's submission documentation. As such, the following two paragraphs summarise the advice given by Officers, at the time:
- i. Officers set out that a flatted development in this location may be acceptable, subject to appropriate heights, high quality design and the retention of the existing building line. Development should respect the character of the area and draw its material inspiration from the surrounding context.
 - ii. In respect of heights, the pre-application advice encouraged the Applicant to undertake a full assessment of a three storey flatted scheme, but, which should have no adverse impact on neighbouring amenity.
- 11.17 When considering this application, at this time, Officers acknowledge that the existing garages and associated hard standing detract from the appearance of the area. There are no listed buildings on the Site and it does not fall within a Conservation Area. As such, the Site does present an opportunity for appropriate redevelopment. This application seeks the provision of social housing, which is a material consideration that Officers give significant weight.
- 11.18 The three terraced houses proposed to be demolished, form part of a terrace of four. Officers agree with the LPA's Design and Conservation Officer that the demolition of the three terraces would result in uneven break in the original terrace and street pattern, leaving 34 Rowden Road as a loose fragment. The proposed block of flats, by virtue of its height, mass, bulk and design, would be at odds with no. 34, left as an awkward, disjointed remaining end of terrace house.
- 11.19 Turning to the design of the proposed block of flats, Officers agree with the LPA's Design and Conservation Officer's comments. The block of flats is considered excessive in height, mass and bulk, relating poorly to adjacent two-storey terraces, with pitched roofs. The flats comprise a rectangular shaped building, with poor design features, including (but not limited to) attached balconies, supported from the ground by a scaffolder structure. The proposed material and fenestration pattern proposed would relate poorly to the established environment, with larger windows and expansive flat faces of brick and zinc, contrasting to the modest scale of detail, fenestration and roof form of existing houses.

- 11.20 It is recognised that the Site's surrounding area does provide a degree of variation, but the impact of this proposal on the character of adjacent terraces and the immediate street scene is considered harmful. Whilst explored later within this report, the height, depth and width of the block of flats also adversely impacts neighbouring amenity.
- 11.21 In this case, the harm (or adverse impacts) of the proposal are weighed against the public benefits. In considering the facts of this proposal, the scheme benefits are considered to comprise:
- Provision of 12 social housing dwellings, helping to address the Council's housing shortfall
 - Employment generation, during the scheme's construction phase.
- 11.22 Officers must balance the harm caused by this proposal, against the benefits. The adverse impacts are considered wide ranging in this case, specifically in relation to the design and impact of the proposed block of flats. The adverse impacts relating to design and summarised in the below three paragraphs.
- 11.23 The three terraced houses proposed to be demolished, form part of a terrace of four. The demolition of the three terraces would result in uneven break in the original terrace and street pattern, leaving 34 Rowden Road as a loose fragment. The proposed block of flats, by virtue of its height, mass, bulk and design, would be at odds with no. 34, left as an awkward, disjointed remaining end of terrace house.
- 11.24 The proposed block of flats comprise a rectangular shaped building, with poor design features, including (but not limited to) attached balconies, supported from the ground by a scaffolder structure. The proposed material and fenestration pattern proposed would relate poorly to the established environment, with larger windows and expansive flat faces of brick and zinc, contrasting to the modest scale of detail, fenestration and roof form of existing houses.
- 11.25 The height, width, mass and poor design of the proposed block of flats adversely impacts the visual amenity of the immediate street scene. It would stand out unsympathetically in local street views, contrasting with the established two-storey dwellings, with pitched roofs.
- 11.26 Drawing these together, the harm caused is in this case considered to outweigh the scheme benefits, when assessed against the NPPF as a whole. The proposal fails to comply with policies CS5 or DM9.

12 Quality of accommodation

- 12.1 The Nationally Described Space Standards (March 2015) sets out internal space standards for new dwellings.
- 12.2 The Standard requires that:
- In order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide
 - In order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²
- 12.3 The proposed units would accord with Nationally Described Space Standards.

Housing mix

- 12.4 Policy DM22 sets out that planning permission will be granted for new residential development proposals that incorporate a mix of dwelling sizes and tenures that meet identified local needs. In order to meet this objective, all residential proposals for four or more units should comprise a minimum of 25% three bedroom, or more, units. Exceptions will be considered where it can be demonstrated that such a mix would be inappropriate to the location or endanger the viability of the proposal.
- 12.5 The proposals comprise a mix of unit sizes with one and two-bedroom flats within the flatted block and three-bedroom dwellings proposed to the rear of the Site. The specific mix is as below:
- 2 x 3 bedroom house (5 person)
 - 8 x 1 bedroom flats (2 person)
 - 2 x 2 bedroom flats (3 person).
- 12.6 Officers are satisfied that the proposal provides an appropriate housing mix.

Private amenity space

- 12.7 For houses a minimum total private outdoor space of 70m² for 3 or more beds and 40m² for 2 beds shall be provided. A minimum depth of 10m of domestic rear garden space shall be sought.
- 12.8 To provide adequate private amenity space for development of flats, a minimum of 5m² of private outdoor space for 1-2 person dwellings should be provided and an extra 1m² should be provided for each additional occupant.
- 12.9 All proposed flats benefit from private amenity balconies and communal landscaped spaces.
- 12.10 The rear gardens of the proposed houses measure 10.1 metres in length, according with local planning policy requirements.
- 12.11 Officers are satisfied that the proposal provides sufficient private amenity space.

13 Neighbouring Amenity

- 13.1 Policy DM9 sets out that Planning Permission will be granted for proposals which make a positive contribution to the Borough's visual character and appearance. In assessing this, the following will be considered:
- compatibility with local character and the relationship to the existing townscape and wider landscape;
 - the surrounding historic and natural environment;
 - the setting of the proposal site and its connection to its surroundings; and the inclusion of locally distinctive features and use of appropriate materials.
- 13.2 Policy DM10 sets out that development proposals will be required to incorporate principles of good design. The most essential elements identified as contributing to the character and local distinctiveness of a street or area which should be respected, maintained or enhanced include, but are not limited, to the following:
- prevailing development typology, including housing types and sizes;
 - prevailing density of the surrounding area;
 - scale, layout, height, form (including roof forms), massing;
 - plot width and format which includes spaces between buildings;

- building line; and
- typical details and key features such as roof forms, window format, building materials and design detailing of elevations, existence of grass verges etc.

13.3 Concerns have been received from nearby residents regarding the impact of the proposed development on neighbouring amenity. Concerns have been taken into consideration by Officers within this assessment.

13.4 The proposed flatted block measures approximately 8.8 metres in height, 17 metres in depth and 21.2 metres in width.

13.5 The proposed houses measure approximately 9.6 metres in height, 8.7 metres in depth and 11.5 metres in width. These benefit from rear gardens, measuring approximately 10.1 metres in length.

13.6 Approximate separation distances are as follows:

Neighbouring property	Separation distance (approximate) (m)
34 Rowden Road	2.4
42 Rowden Road	2.3
16 Bourne Way	20.2
14 Bourne Way	23.6
8 and 10 Bourne way	28.9
49 and 51 Hogsmill Way	26.6
6 Crane Court	15.6
7 Crane Court	25.2 (to proposed houses) 27.9 (to proposed block of flats)

13.7 The side elevation of 34 Rowden Road is located approximately 2.4 metres from the proposed block of flats. The proposed block of flats step-in on the eastern side elevation and has a set-back on the top floor. However, the height and positioning of the block of flats is considered to have an unacceptable impact on the neighbouring amenity enjoyed at 34 Rowden Road, by means of overbearing and loss of outlook. Furthermore, a balcony is proposed on the rear elevation of the proposed block of flats, which could raise issues of overlooking and loss of privacy at 34 Rowden Road.

13.8 The side elevation of 42 Rowden Road is located approximately 2.3 metres from the proposed block of flats. Whilst the block of flats has been designed with a set-back top storey, the western elevation of the building does not step-in, providing no relief to 42 Rowden Road. The height and positioning of the block of flats is considered to have an unacceptable impact on the neighbouring amenity enjoyed at 42 Rowden Road, by means of overbearing and loss of outlook. Furthermore, a balcony is proposed at the rear elevation of the proposed block of flats, which could raise issues of overlooking at loss of privacy at 42 Rowden Road.

- 13.9 14 and 16 Bourne Way are positioned approximately 20 metres from the proposed block of flats. The block of flats comprise balconies on its rear elevation, which give rise to issues of overlooking into the rear gardens of both of these properties, given the modest depth of the rear gardens at these properties.
- 13.10 Both 8 and 10 Bourne Way are considered to be adequately separated from the proposed two dwellings, given the proposed height, width and depth, to ensure no adverse impact on the neighbouring amenity enjoyed at 8 and 10 Bourne Way.
- 13.11 Both 49 and 51 Hogsmill Way are considered to be adequately separated from the proposed two dwellings, given the proposed height, width and depth, to ensure no adverse impact on the neighbouring amenity enjoyed at 49 and 51 Hogsmill Way.
- 13.12 6 Crane Court is considered to be adequately separated from the proposed two dwellings, given the proposed height, width and depth, to ensure no adverse impact on the neighbouring amenity enjoyed at this property.
- 13.13 7 Crane Court is considered to be adequately separated from the proposed two dwellings and block of flats, to ensure no adverse impact on the neighbouring amenity enjoyed at this property.

Summary

- 13.14 By means of its height, mass, bulk and positioning within the Site, the proposal block of flats is considered to adversely impact the neighbouring amenity enjoyed at 34 and 42 Rowden Road and 14 and 16 Bourne Way, failing to comply with Policies DM9 and DM10.

14 Highways and car parking

- 14.1 Policy CS16 encourages development proposals that foster an improved and integrated transport network and facilitate a shift of emphasis to non-car modes as a means of access to services and facilities. Development proposals should be appropriate for the highways network in terms of the volume and nature of traffic generated, provide appropriate and effective parking provision, both on and off-site, and vehicular servicing arrangements. Furthermore, development proposals must ensure that vehicular traffic generated does not create new, or exacerbate existing, on street parking problems, not materially increase other traffic problems.
- 14.2 Policy DM36 sets out that to secure sustainable transport patterns across the Borough, the Council will (inter alia) prioritise the access needs of pedestrians and cyclists in the design of new developments.
- 14.3 Concerns have been raised by neighbours regarding the proposed car parking and potential overspill into surrounding roads. This has been taken into consideration by Officers, within this assessment.
- 14.4 A Transport Assessment accompanies this application. The following paragraphs summarise the information contained within this Statement. A further Parking Technical Note was submitted with this application in response to comments received from SCC Highways. This is discussed later within this Report.
- 14.5 The Transport Assessment sets out that the Site is well located to support sustainable development, with a number of services within walking/cycling distance. The nearest bus stop is located directly opposite Crane Court, approximately 10m to the south on Hogsmill Road, allowing for access to destinations such as Epsom, Kingston and North Cheam on a regular basis on both weekdays and weekends. Tolworth Railway Station is located 1km north of the site, facilitating services to London Waterloo, Wimbledon, Earlsfield and Clapham Junction frequently during peak hours.

- 14.6 The Transport Statement sets out that the garages are owned privately by Rosebury Housing Association, but due to size and design, are not able to facilitate parking and thus are used for storage only. The Transport Statement therefore sets out the development of the Site will not result in a loss of car parking spaces. An email from the architect on 01.04.2020 provided information regarding the existing use of the garages, stating that 10 are occupied. Of the 10 occupied garages, eight occupants are residents of West Ewell and two are residents further afield in Epsom.

Access

- 14.7 The Transport Assessment sets out that pedestrians will be able to access the proposed flats from Rowden Road. Existing driveways would be revised, to provide 4 vehicular car parking spaces to serve the development, accessed via a dropped kerb.
- 14.8 To the south, the existing arrangement onto Crane Court would remain. This access has a radius of 9 metres to the east and 6 metres to the west of the junction, with a road width of 6 metres. These dimensions allow for two way vehicle movement into Crane Court.

Car parking spaces

- 14.9 The Transport Statement sets out that 17 unallocated car parking spaces are proposed to serve the development. The Parking Standards SPD identifies that the requirement for the proposal would be:
- 1 & 2 bedroom flats: 1 space per unit (outside Epsom Town Centre) x 10 units = 10 spaces
 - 3 bedroom houses: 2 spaces per unit (outside Epsom Town Centre) x 2 houses = 4 spaces
 - The total requirement for the proposal in line with the Parking SPD would be 14 spaces.
- 14.10 The Transport Assessment acknowledged that the proposal overprovides on car parking, by 3 spaces. This allows for visitors, to prevent overflow parking onto the local highway network. It is proposed that 4 of these spaces would front onto Rowden Road, whilst the remaining 13 would be positioned within a parking court on Crane Court.
- 14.11 4 cycle spaces are proposed for the two proposed dwellings and 10 cycle are proposed for the block of flats, to meet the requirements of Surrey County Council (SCC) Vehicular and Cycle Parking Guidance (January 2018).
- 14.12 The Local Planning Authority's Planning Policy formally commented on this application. The response states that 17 car parking spaces is excessive and at odds with policy CS16, which encourages proposals that facilitate a shift of emphasis to non-car modes as a means of access to services and facilities. As such, the level of car parking should be reduced.
- 14.13 The excess car parking spaces could be used for biodiversity enhancements, as per the recommendation of the Ecological Appraisal.
- 14.14 In an email dated 17.12.2020, the Applicant's architect sets out that the parking policy and standards are provided as a minimum and do not take into consideration visitor's parking. It is the Applicant's view that the proposed parking provision is suitable.

Servicing arrangements

- 14.15 The Transport Assessment sets out that servicing will take place internally within the Site, in order to reduce the impact on the local road network. A bin store will be provided to the west of the development to the rear of the flats, to allow for refuse collection.
- 14.16 Tracking of a refuse vehicle is attached as Appendix C within the Transport Assessment, which demonstrates that a refuse vehicle is able to enter the site, turn and exit in forward gear, whilst being within 10m of the bin store, in line with Manual for Streets (MfS) guidance for 1,100L Eurobins.
- 14.17 Fire tender vehicles are able to enter the Site, turn and exit in a forward gear to get within 45m of all dwellings, in accordance with Building Regulations Part M.
- 14.18 In response to the above, the Local Planning Authority's Waste Team formally commented on this application, with the following questions:
- How is the combined bin/cycle store compartmentalised/controlled to ensure that bins are accessible to both residents and collectors, and not compromised by parked cycles?
 - The turning dimensions for a refuse vehicle look very tight. The Council's guidance document requests a roadway at least 5m wide. The vehicle dimensions in the Transport Statement do not conform to the required dimensions of Local Planning Authority's vehicles.
- 14.19 Surrey County Council Fire & Rescue formally commented on this application. The application has been examined by a Fire Safety Inspecting Officer and it demonstrates compliance with the Fire Safety Order in respect of means of warning and escape, in case of fire.

Trip generation

- 14.20 The Transport Assessment sets out that the proposal is anticipated to generate one additional trip in the AM peak, 2 additional trips in the PM peak and 16 additional trips over a 2 hour period when compared to the existing situation. The proposed development is therefore anticipated to have a negligible impact the surrounding road network, given that the proposals are anticipated to result in the addition of circa one trip an hour over a 12 hour period.

SCC Highways

- 14.21 In its initial response, dated 15.01.2020, SCC Highways requested that the Applicant justified the loss of the garage parking area. Following a site visit, SCC Highways set out that local residents do use the Site for parking, with vehicles observed parking along the entire length of Crane Court. What was not clear was how many garages were occupied by vehicles. No information was originally provided on how many residents use this area for parking or how many are entitled to use the garages. A survey to show the current use was requested. Any shortfall should be accommodated within the new layout plan. In particular, the residents currently parking along the access road would likely block access for delivery, refuse and emergency vehicles. The Applicant was requested to address this.
- 14.22 In response to the above, the Applicant prepared a Parking Technical Note, dated February 2020. Information obtained suggests that only 10 of the 24 garages are let (although not necessarily occupied by cars), with the remaining 14 vacant.

- 14.23 The Parking Technical Note sets out that survey results demonstrate that the roads within 200m of the Site have available capacity during peak hours to accommodate any displaced garage users as a result of the proposed development, with a minimum available capacity of 77 spaces. Even without any available spaces on Crane Court, all parking can suitably be accommodated within the local road network.
- 14.24 The Parking Technical Note sets out that the service road is private land and therefore the applicant would manage the parking, either through the implementation of private parking enforcement or alternative methods, ensuring access is achievable at all times for servicing and emergency vehicles.
- 14.25 An email from the Applicant's architect, dated 01.04.2020 provided further information regarding management, setting out that the development would be managed directly by Rosebery and it is proposed that signage would be installed confirming that the proposed spaces are for residents only. This would be monitored and should persistent issues arise whereby this is not adhered to, enforcement would be considered.
- 14.26 SCC Highways reviewed the updated information provided by the applicant and confirmed in its response, dated 06.04.2020, no objections, subject to conditions and informatives, should planning permission be granted.

Officer comments

- 14.27 Both SCC Highways and SCC Fire and Rescue have formally reviewed this application. SCC Highways has no objections, subject to conditions and informatives, should planning permission be granted. Surrey County Council Fire & Rescue confirmed that the application has been examined by a Fire Safety Inspecting Officer and it demonstrates compliance with the Fire Safety Order, in respect of means of warning and escape, in case of fire.
- 14.28 The Local Planning Authority's Waste Team raise issued regarding how the combined bin and cycle store would be managed, to ensure accessibility to both residents and collectors. Furthermore, the Waste Team indicated that the turning dimensions for a refuse vehicle look tight and that the proposed vehicle dimensions (confirmed in the Transport Assessment) do not conform to the required dimensions of the Local Planning Authority's vehicles.
- 14.29 Policy DM37 requires proposals to demonstrate that they provide an appropriate level of off-street parking to avoid an unacceptable impact on the on-street parking conditions and local traffic conditions. The policy links to relevant standards set out in the Parking Standards for Residential Development SPD. Applying the SPD methodology, the proposal would give rise to a requirement for 14 parking spaces. The scheme would provide a total of 17 spaces, which is an overprovision, but the standards are couched as minimums and therefore the proposal does not in itself give rise to conflict with Policy DM37. There is no substantive evidence to demonstrate that the provision of additional spaces over and above the minimum requirement would have an unacceptable impact on local on-street parking or traffic conditions. The lack of objection from the Highway Authority supports this.
- 14.30 The proposal is considered to comply with Policy DM37.

15 Trees and landscaping

- 15.1 Policy DM5 (Trees and Landscape) of the Development Management Policies Document (2015) sets out that the Borough's trees, hedgerows and other landscape features will be protected and enhanced by (inter alia):

- Planting and encouraging others to plant trees and shrubs to create woodland, thickets and hedgerows; and
 - Requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include the planting of new semi-mature tree and other planting.
- 15.2 Policy DM5 further states that where trees, hedgerows or other landscape features are removed, appropriate replacement planting will normally be required. Consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change.
- 15.3 The Local Planning Authority's Tree Officer has not provided a formal comment on this application. Therefore, Officers have used their professional judgement when assessing trees and landscaping.
- 15.4 Officers acknowledge that there is very limited vegetation within the Site at present, given that it comprises built development and hardstanding. This proposal seeks to maximise built form and hardstanding, leaving limited room and scope for considered tree planting and landscaping. This results in a scheme that fails to integrate the landscape and the buildings, weighing negatively within the planning balance.
- 15.5 The proposal is not considered to comply with Policy DM5 of the Development Management Document (2015).

16 Ecology

- 16.1 Policy CS3 sets out that the biodiversity of Epsom and Ewell will be conserved and enhanced through the support for measures which meet the objectives of National and Local biodiversity action plans in terms of species and habitat. Development that would harm Grade 3 Sites of Nature Conservation Interests (SNCIs) will not be permitted unless suitable measures are put in place and it has been demonstrated that the benefits of a development would outweigh the harm caused.
- 16.2 Policy DM4 seeks to ensure that new development takes every opportunity to enhance the nature conservation potential of a Site and secure a net benefit to biodiversity. It sets out that development affecting existing or proposed nature conservation sites and habitats of international, national or local importance will only be permitted if:
- The development would enhance the nature conservation potential of the site or is proven to be necessary for the conservation management of the site; or
 - There is no alternative location for the development and there would be no harm to the nature conservation potential of the site; or
 - There are imperative reasons of overriding public interest for the development.
- 16.3 An Ecological Appraisal, dated September 2019, accompanies this application. It sets out that:
- No adverse impacts on wildlife designated sites is likely, providing a CEMP is prepared for the site clearance and construction phases of the project
 - Trees which will be removed are recommended to be replaced on a like-for-like basis.
 - Further survey for bats - one dusk emergence survey for B36 and B40
 - The oak tree (TN1) should be soft-felled, as removal is necessary
 - Vegetation clearance is recommended outside of the nesting bird season (clearance possible October to February inclusive). If this is not possible, an ECoW should perform a nesting bird check within 48 hours prior to clearance
 - Any holes or trenches to be covered over at night or else a ready escape route provided; and

- Brash piles should be removed from May to September to avoid disturbing hibernating hedgehogs.
- 16.4 Enhancements including locally native landscape planting, bat and bird boxes (as well as other considerations) have been recommended. A net gain in biodiversity is readily achievable for the site.
- 16.5 A Bat Emergency Survey Report accompanies this application. It sets out:
- Six species of bat were returned from the biological records centres within a 2 km radius of the Site
 - No emerging bats were recorded during the dusk emergence survey of buildings B36 and B40. Therefore, roosting bats are considered likely absent from these buildings and they may be demolished without further survey or licensing (in line with timings as recommended in the ecological appraisal)
 - The other buildings on site were assessed as having negligible suitability for roosting bats
 - The oak tree was assessed as having low suitability for roosting bats and should be removed using soft-felling techniques
 - An ecologist should be consulted if demolition works do not proceed by May 2020
 - If bats or evidence of bats is found prior to or during works, demolition works must cease and an ecologist consulted
 - Low levels of foraging activity of a common species of bat (common pipistrelle) were recorded in the rear garden of B40, with occasional passes of soprano pipistrelle and noctule
 - Bat boxes are recommended to be erected on new buildings, along with a bat-friendly lighting strategy
 - To enhance habitat for commuting and foraging bats, the use of green boundaries and green planting of native species should be considered
 - A hedgehog was also observed during the bat survey; the ecological appraisal contains recommendations in relation to this species.
- 16.6 The LPA's Ecologist has reviewed this application and confirmed no objection, subject to ensuring that the suggested enhancements of the reports are captured within a Condition, should planning permission be granted.
- 16.7 Officers raise concern that the hardstanding sought for the proposed car parking provision limits the quantity and quality of trees and landscaping, which in turn impacts the ecological enhancements that could be delivered on Site. But, the LPA's Ecologist confirms that ecological enhancements can be captured within a Condition, which weighs as a positive minor benefit.
- 16.8 The proposal is considered to comply with policies CS3 and DM4.

17 Flood risk and drainage

- 17.1 Policy DM19 set out that development within Flood Zones 2 & 3 or on sites of 1ha or greater in Zone 1 and sites at medium or high risk from other sources of flooding, will not be supported unless:
- In fluvial flood risk areas, the sequential and exception tests have been applied and passed and it is a form of development compatible with the level of risk; and
 - For all sources of risk, it can be demonstrated through a site FRA that the proposal would, where practicable, reduce risk both to and from the development or at least be risk neutral; and
 - Where risks are identified through an FRA, flood resilient and resistant design and appropriate mitigation and adaptation can be implemented so that the level of risk is reduced to acceptable levels.

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- 17.2 A small part of the Site, at the existing driveway, is understood to be within a Critical Drainage Area. This is a technical issue, requiring a suitable drainage scheme.
- 17.3 A Drainage Statement is submitted with this application. It provides a strategy for site & surface water drainage and foul drainage.
- 17.4 Surrey County Council Local Lead Flood Authority (LLFA) formally commented on this application and sets out that it is not satisfied with the proposed drainage scheme. The response sets out:
- The Applicant states that the Site is underlain by London Clay, but no evidence has been provided. The guidance documents sets out that soakaway test results should be completed to accompany both full and outline planning applications. If intrusive investigations cannot be completed to accompany the application the Applicant should provide robust justification and evidence
 - A surface water discharge rate of 2 litres/sec is proposed from the Application Site. 2 litres/sec is not considered a practicable minimum discharge rate based on the risk of blockage. Many low flow control devices are available on the market to enable very low discharge rates to be achieved. This is particularly relevant for drainage strategies where the majority of surface water is proposed to discharge through a lined permeable paving system which prevents the risk of blockage from larger debris.
- 17.5 The response sets out that in the event that planning permission is granted, suitably worded conditions should be applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development.
- 17.1 Thames Water formally commented on this application and sets out:
- with regard to surface water, if the developer follows the sequential approach to the disposal of surface water it would have no objection; and
 - With regard to waste water network and sewage treatment works infrastructure capacity, it would not have any objection.
- 17.2 The Environment Agency (EA) formally commented on this application confirming that the EA do not comment on critical drainage areas. It notes that the application is proposing a soakaway for surface water drainage. There is an existing surface water system serving this area (with the Hogsmill and a tributary nearby), so, the EA would recommend the surface flows to go to river. The site is on clay, so the efficacy of a soakaway may be limited, but this would be for the Lead Local flood Authority to determine. It would expect usual protection of the surface water network from potential pollution from sources such as car parking on the new development.
- 17.3 Subject to the imposition of suitable conditions, should planning permission be granted, the proposal is considered to comply with policy DM19.

18 Presumption in favour of sustainable development

- 18.1 In accordance with paragraph 12 of the NPPF, development proposals that accord with an up to date Development Plan should be approved and where a planning application conflicts with an up to date Development Plan, planning permission should not usually be granted.

- 18.2 Development policies are regarded as being out of date where a Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites or where the housing delivery test indicates that the delivery of housing was substantially below the housing requirement over the previous three years (paragraph 11d and footnote 7 of the NPPF). Existing policies should not be considered out of date simply because they were adopted or made prior to the publication of the 2018 NPPF, or its reissue in 2019. Due weight should be given to existing policies according to their degree of consistency with the policies of the NPPF (paragraph 213). The NPPF is therefore an important material consideration that may over-ride Development Plan policies that were adopted prior to the publication of the NPPF and which are not consistent with it.
- 18.3 Paragraph 11d of the NPPF is engaged via footnote 7 in circumstances where Local Planning Authorities cannot demonstrate a five year housing land supply. The practical application and consequence of this is that unless a site is located in an area or involves an asset of particular importance that provides a clear reason for refusal, then planning permission must be granted, unless it can be demonstrated that any adverse impacts demonstrable outweigh the benefits, when assessed against the NPPF as a whole.
- 18.4 Under the Standard Methodology, Epsom and Ewell Borough Council's housing need figure is confirmed as 579 units per annum. This then rises to 695 per annum, due to the measures imposed by the Housing Delivery Test, for under delivery in recent years. Currently, the Local Planning Authority cannot demonstrate a five-year supply of housing land. The evidence shows that the Borough has a significant lack of housing land supply that is available, developable and deliverable.
- 18.5 In considering the facts of this proposal, the scheme benefits are considered to comprise:
- Provision of 12 social housing dwellings, helping to address the Council's housing shortfall
 - Employment generation, during the scheme's construction phase.
- 18.6 The adverse impacts are considered wide ranging in this case, specifically in relation to the design and impact of the proposed block of flats. Its excessive height, width, mass and poor design causes harm to the character of adjacent houses, specifically 34 Rowden Road. As a result of the proposal, this would be an awkward, disjointed remaining end of terrace house. The height, width, mass and poor design of the proposed block of flats also adversely impacts the visual amenity of the immediate street scene, contrasting with two-storey dwellings, with pitched roofs.
- 18.7 As a result of its excessive height, width, mass and poor design features, the proposed block of flats would harm the neighbouring amenity enjoyed at 34 Rowden Road and 42 Rowden Road, by means of overbearing and loss of outlook. The proposed balconies to the rear of the proposed block of flats give rise to issues of overlooking and loss of privacy at these neighbouring dwellings.
- 18.8 Issues of overlooking into the rear gardens of 14 and 16 Bourne Way are raised as a result of the proposed balconies on the rear elevation of the proposed block of flats.
- 18.9 In considering the planning balance, the adverse impacts of this development are considered to outweigh the benefits in this case, when considering the Framework as a whole.

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Community Infrastructure Levy

18.10 The development will be CIL liable but would be eligible to apply for Social Housing relief (Mandatory) from the liability to CIL. As per CIL Regs 49 Community Infrastructure Levy Regulations 2010 (as amended).

19 Conclusion

- 19.1 The loss of the garages is considered acceptable in this case. 10 of the 24 garages are let and the remaining 14 are vacant. Survey results demonstrate that there is capacity within the surrounding roads to accommodate any displaced garage users, as a result of the proposed development. SCC Highways has no objection to the proposal, subject to conditions being attached to any planning permission granted.
- 19.2 Paragraph 11d of the NPPF is engaged via footnote 7 in circumstances where Local Planning Authorities cannot demonstrate a five year housing land supply. The practical application and consequence of this is that unless a site is located in an area or involves an asset of particular importance that provides a clear reason for refusal, then planning permission must be granted, unless it can be demonstrated that any adverse impacts demonstrable outweigh the benefits, when assessed against the NPPF as a whole.
- 19.3 Under the Standard Methodology, Epsom and Ewell Borough Council's housing need figure is confirmed as 579 units per annum. This then rises to 695 per annum, due to the measures imposed by the Housing Delivery Test, for under delivery in recent years. Currently, the Local Planning Authority cannot demonstrate a five-year supply of housing land. The evidence shows that the Borough has a significant lack of housing land supply that is available, developable and deliverable.
- 19.4 In considering the facts of this proposal, the scheme benefits are considered to comprise:
- Provision of 12 social housing dwellings, helping to address the Council's housing shortfall
 - Ecological enhancements
 - Employment generation, during the scheme's construction phase.
- 19.5 The adverse impacts are considered wide ranging in this case, specifically in relation to the design and impact of the proposed block of flats.
- 19.6 The three terraced houses proposed to be demolished, form part of a terrace of four. The demolition of the three terraces would result in uneven break in the original terrace and street pattern, leaving 34 Rowden Road as a loose fragment. The proposed block of flats, by virtue of its height, mass, bulk and design, would be at odds with no. 34, left as an awkward, disjointed remaining end of terrace house.
- 19.7 The proposed block of flats comprise a rectangular shaped building, with poor design features, including (but not limited to) attached balconies, supported from the ground by a scaffolder structure. The proposed material and fenestration pattern proposed would relate poorly to the established environment, with larger windows and expansive flat faces of brick and zinc, contrasting to the modest scale of detail, fenestration and roof form of existing houses.
- 19.8 The height, width, mass and poor design of the proposed block of flats also adversely impacts the visual amenity of the immediate street scene. It would stand out unsympathetically in local street views, contrasting with the established two-storey dwellings, with pitched roofs.

- 19.9 As a result of its excessive height, width, mass and poor design features, the proposed block of flats would harm the neighbouring amenity enjoyed at 34 Rowden Road and 42 Rowden Road, by means of overbearing and loss of outlook. The proposed balconies to the rear of the proposed block of flats give rise to issues of overlooking and loss of privacy at these neighbouring dwellings.
- 19.10 Issues of overlooking into the rear gardens of 14 and 16 Bourne Way are raised as a result of the proposed balconies on the rear elevation of the proposed block of flats.
- 19.11 Officers acknowledge that there is very limited vegetation within the Site at present, given that it comprises built development and hardstanding. This proposal seeks to maximise built form and hardstanding, leaving limited room and scope for considered tree planting and landscaping. This results in a scheme that fails to integrate the landscape and the buildings.
- 19.12 In considering the planning balance, the adverse impacts of this development are considered to outweigh the benefits in this case, when considering the NPPF as a whole.

20 Recommendation

- 20.1 Officers recommend refusal of this application.

Reasons for refusal:

- (1) The demolition of three terraced houses would result in uneven break in the original terrace of four and the street pattern. By virtue of its excessive height, mass, bulk and poor design, the proposed block of flats would be at odds with 34 Rowden Road, left as an awkward, disjointed, remaining end of terrace house. This causes harm to the character of the street scene, failing to comply with paragraph 127 of the NPPF (2019) Policy DM9 of the Development Management Policies Document (2015)
- (2) The proposed block of flats comprises poor design features, including attached balconies, supported from the ground by a scaffolder structure. The proposed material and fenestration pattern proposed would relate poorly to the established environment, contrasting to the modest scale of detail, fenestration and roof form of existing houses. This causes harm to the establish character of the area, failing to comply with paragraph 127 of the NPPF (2019), Policies DM9 and DM10 of the Development Management Policies Document (2015)
- (3) The excessive height, width, mass and poor design features of the proposed block of flats would harm the neighbouring amenity enjoyed at 34 Rowden Road and 42 Rowden Road by means of overbearing and loss of outlook. The proposed balconies to the rear of the proposed block of flats give rise to issues of overlooking and loss of privacy at these neighbouring dwellings. The proposed balconies give rise to issues of overlooking into the rear gardens of 14 and 16 Bourne Way. This fails to comply with policy DM10 of the Development Management Policies Document (2015)
- (4) The proposal seeks to maximise built form and hardstanding, leaving limited room and scope for considered tree planting and landscaping. This results in a scheme that fails to integrate the landscape and the buildings, failing to comply with policy DM5 of the Development Management Document (2015).

Informative(s):

- (1) In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies in the

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Core Strategy, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably

(2) The following drawings were submitted with this application:

- 19-046 101 P3 – Site Location Plan – dated 01.05.19
- 19-046 102 P3 – Existing Site Plan – dated 01.05.19
- 19-046 103 P2 - Existing Elevations – dated 01.05.19
- 19-046 104 P4 – Proposed Site Plan – dated 01.05.19
- 19-046 105 P3 - Proposed Plans & Elevations Houses 1-2 – dated 01.05.19
- 19-046 106 P3 - Proposed Plans Flats 3-12 – dated 01.05.19
- 19-046 107 P3 - Proposed Elevations Flats 3-12 – dated 01.05.19
- 19-046 108 P2 - Proposed Plans & Elevations Bin & Bike Store – dated 01.05.19
- 19-046 109 P2 - Proposed Amendments No. 34 Rowden Road – dated 30.04.19