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Your Ref: PP-09906696
Our Ref: 2072A



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Dear Sir or Madam

APPLICATION FOR FULL PLANNING FOR ALTERATIONS TO ELEVATIONS

25-26 EASTON STREET, HIGH WYCOMBE, HP11 1NT

Our client, Easton Street Limited, has instructed DWD to submit a full planning application for external alterations to the building and the erection of a cycle store and refuse storage area at 25-26 Easton Street, High Wycombe, HP11 1NT.

The application has been submitted via the Planning Portal under application reference PP-09906696. The application is submitted alongside a secondary application (PP-09906646) which seeks prior approval for the change of use of the site from a Class B1a office (now Class E) to 8 class C3 residential units. The application subject to this letter is required in order to facilitate adequate daylight and access for the proposed residential units.

The description of development is:

“External alterations to building including alterations to fenestration on side and rear elevations of the building and erection of cycle store and refuse storage area.”

Application Submission

The application comprises this Cover Letter (including Planning, Heritage, Design and Access Assessment) and the following documents (submitted via the Planning Portal as one application):

- Application Form.
- Drawings prepared by Morphuse:
 - Existing Ground Floor Plans. Drawing No. 100.
 - Existing First Floor Plans. Drawing No. 101.
 - Existing Second Floor Plans. Drawing No. 102.
 - Block Plan with Details. Drawing No. 103.
 - Location Plan. Drawing No. 104.
 - Existing and Proposed Side Elevations. Drawing No. 105.
 - Existing and Proposed Side Elevations. Drawing No. 106.

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- Existing and Proposed Front Elevations. Drawing No. 107.
- Existing and Proposed Rear Elevations. Drawing No. 108.
- Bicycle Shelter for 10 Cycles. Drawing No. 109.
- Wheelie Bin Enclosure. Drawing No. 110.
- Proposed Floor Plans. Drawing No. 500.

The Site

25-26 Easton Street (the “Site”) is located within the High Wycombe Town Centre boundary within the Town Centre Conservation Area. The property is not listed or immediately adjacent to any listed buildings.

The Site measures approximately 342 sq.m and comprises a B1(a) office unit (now Use Class E) across the ground, first and second floors.

High Wycombe Station is located 200m north of the Site and the closest bus service is located 110m to the west. The site is therefore considered to have a high level of public transport accessibility.

The Site is within Flood Zone 1, with a low annual probability of flooding, a flood risk assessment is therefore not required.

Pedestrian access to the upper floors is via a stairwell location on the right side of the Easton Street frontage.

The Site has 2 vehicle parking spaces and 10 cycle parking spaces.

Planning History

Prior approval was granted in September 2020 for “*Prior notification application (Part 3 Class O) for change of use of building falling within Use Class B1(a) (Offices) to Use Class C3 (Dwellings) with creation of 6 apartments*” under application 20/06832/PNP30.

Proposed Development

The Proposed Development is for alterations to the building elevations. The works proposed include:

- Removal of small roof structures on the western and northern elevations.
- Installation of 1no. door on western elevation.
- Installation of 7no. windows (4no. windows new openings and 3no. replacement windows) and 1no. door on western elevation.
- Removal of 2no. doors and 1 no window on rear elevation and replacement with 2no. windows.
- Works to rear elevation to fully enclose a narrow partially enclosed gap between two existing rear extensions.

The works proposed will support the conversion of the property from its current office use to a residential use. This is subject to a secondary application submitted to the Council under PP-09906646.

The works are considered appropriate to the building context and will be done in materials to match the existing finishes on the property.

Details of the specific door access locations and windows can be seen within the submitted plans.

Policy Assessment

The Wycombe District Local Plan was adopted on 19 August 2019, and the Delivery and Site Allocations Plan for Town Centres and Managing Development (DSA Plan) was adopted 16 July 2013. The relevant policies are identified and assessed in the following paragraphs.

Principle of Development

The DSA Plan identifies the Site as being within allocation HWTC7 'Easton Street', this allocation confirms that the area is allocated as a Town Centre Business Area and that any redevelopment proposals should be primarily for B1 office uses. The policy confirms that proposals for other main town centre uses and limited residential development are acceptable but should not be of a scale that would undermine the predominantly business nature of the area. It also states that proposals should secure an active ground floor frontage onto Easton Street.

The principle of development of the Site for residential uses is established under application 20/06832/PNP30. It is therefore considered that works to facilitate a residential use are appropriate.

Design

Local Plan Policy CP9 'Sense of Place' identifies the Council's aim to deliver a distinctive high-quality sense of place within the District. This is to be achieved through conserving the natural and historic environment and implementing measures for their enhancement; requiring development to achieve a high quality of design which contributes positively to making places better for people and which takes the opportunities available for improving the character and quality of an area and the way it functions; optimising the development of previously developed land; and optimising the density of development to make best use of land whilst respecting the distinctive character of the area.

Similar to Policy CP9, Local Plan Policy DM35 'Placemaking and Design Quality' sets out the Council's approach to securing high quality design in development, accompanied by a strong sense of place.

The proposed development will result in limited visual changes to the property and will be done in materials to match the existing doors and windows on the property. The windows have been arranged to retain symmetry on the elevations and enhance what was an irregular western elevation including by use of timber sash windows. It is considered that the works are appropriate in design terms.

The proposed development will also facilitate the optimisation of the property for residential units by providing improved natural light and access points for future residents.

The proposed timber cladding to the refuse storage area and cycle storage is considered an appropriate material for the external space. The use of timber creates structures with reduced massing and is considered appropriate for the Site's location in the context of the wider conservation area.

Amenity

Local Plan Policy DM35 'Placemaking and Design Quality' states that development is required to provide a level of privacy and amenity for future occupants appropriate to the proposed use and prevent significant adverse impacts on the amenities of neighbouring land and property.

It is acknowledged that the proposal will result in windows facing on to the residential development at 24 Easton Street. It is however noted that the proposal already has 3 upper floor windows facing 24 Easton Street and therefore the addition of three more windows, at a separation distance of 10m across a road, will not represent a significant or unacceptable impact upon neighbouring amenity.

This optimisation of the site is supported by National Planning Policy which states that in NPPF paragraph 123 that *“plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport.”*

Transport

Local Plan Policy DM33 ‘Managing Carbon Emissions: Transport And Energy Generation’ states that development is required to *“Provide for parking sufficient to meet the needs of future occupants and to ensure there is no significant adverse impact from overspill parking”*.

The amount of vehicle parking (2 spaces) is to be established as acceptable under the submitted prior approval application. This is expected to be considered as acceptable given the existing sustainable location within close proximity to amenities and public transport links.

This application enhances the previous prior approval by providing 10no. secure cycle parking spaces to the rear of the site. The number of spaces provides 1 space per flat (in line with Buckinghamshire Countywide Parking Guidance) and an additional 2 spaces if required.

Please note that the submitted plans do not provide the final details of the front elevation access doors as this will be determined by the final detailed specifications. If a condition is required to ensure they are secure for resident access only, the applicant would be agreeable to this.

Heritage

NPPF Chapter 16 ‘Conserving and enhancing the historic environment’ identifies at paragraph 189 that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”*.

It is considered that this Heritage Assessment is appropriate in the context of paragraph 189 of the NPPF when taking into consideration the works that are proposed and the building’s heritage significance.

Paragraph 192 that *“In determining applications, local planning authorities should take account of ... the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”*.

Paragraph 196 confirms that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

Local Plan Policy CP11 ‘Historic Environment’ states that the Council will promote the conservation and enhancement of the Historic Environment.

The proposed works are considered to improve the appearance of the building and as such will preserve and retain the Conservation Area's significance. The works will also assist in ensuring the optimum and most viable use of the site for residential purposes and will enhance the living conditions for future residential occupiers compared to the extant prior approval granted under application ref. 20/06832/PNP30.

It is considered that the works that are proposed will preserve and enhance the visual amenities of the Conservation Area by replacing several windows in the west elevation with timber sash windows. Paragraph 196 of the NPPF requires that the public benefits of proposals, in this case securing the buildings optimum viable use to meet the need for housing, be weighed against alterations affecting heritage assets even if they cause less than substantial harm.

The proposed use of timber for the rear refuse and cycle storage space is considered appropriate in terms of providing a soft material that will not create a solid massing that could harm the conservation area. This hardstanding space is also considered to represent limited value to the conservation area due to its set back nature which is enclosed between modern buildings.

Summary

We consider that, for the reasons given above, the proposed works should be considered as acceptable and, as such, should be approved.

We trust that this application contains sufficient information to validate the application as soon as possible, and we look forward to receiving your decision within the statutory determination period. However, if any further information is required, please do not hesitate to contact James Smith (james.smith@dwdllp.com/ 02074894833).

The applicant also wishes to note they are open to discussion with Buckinghamshire Council on any design changes required to make the application acceptable. Therefore, if any minor changes are sought by the Council please let DWD know, and we will arrange for amendments to be made quickly. The applicant is keen to secure approval swiftly, to enable them to commence works and avoid a prolonged vacancy at the site.

Yours faithfully,

A handwritten signature in black ink that reads 'J. Smith'.

James Smith MRTPI

Senior Planner

DWD

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