

21162 – 338 LEAGRAVE ROAD, LUTON,  
BEDFORDSHIRE, LU3 1RE



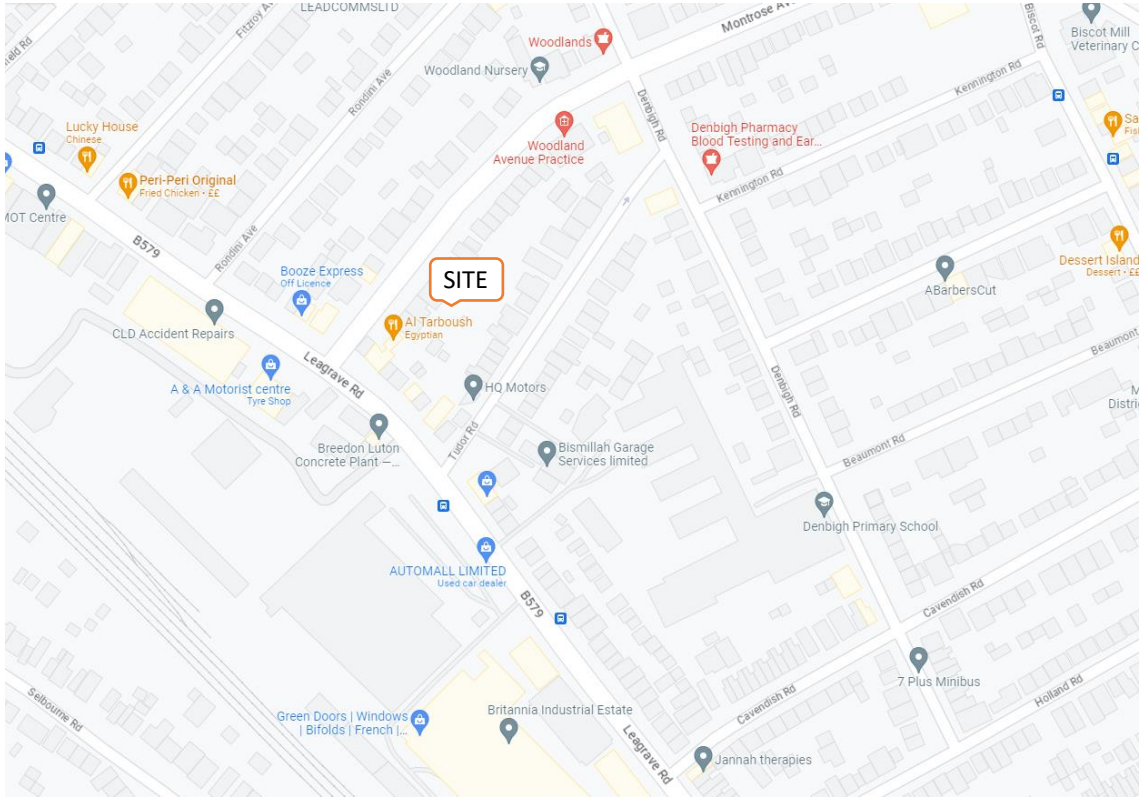
## DESIGN AND ACCESS STATEMENT

Proposed ground floor reinstatement of original 2 units, 2 bed flat with office to first floor, with 2 storey extension to rear and demolition of extant buildings used in connection with tyre business

D&A to be read in conjunction with Planning Statement

Site Address:

338 Leagrave Road, Luton, Bedfordshire, LU3 1RE



Client:

HBK Investments Ltd

Agent:

Amico Design Limited

Farriers Barn, Station Farm, Denton Road, Northamptonshire, NN7 2BG

## Location



The application site is an extended two storey building located on the corner of Leagrave Road and Tudor Road, close to the traffic light interjunction with Woodland Avenue. The main building in retail use and the single storey rear outbuildings used as tyre repair facilities. The surrounding area is a mixture of commercial and residential uses and currently looks visually detrimental to the streetscene.

## Planning History

**Ref. No: 86/00200/FUL - CONSTRUCTION OF A STAIRCASE TO FIRST FLOOR FLAT**

**Ref. No: 83/00247/FUL - SECTION 32 APPLICATION CONTINUED USE WITHOUT COMPLIANCE WITH CONDITION 2 OF PLANNING PERMISSION 28963 DATED 10/03/82**

**Ref. No: 81/00230/FUL - USE OF WAREHOUSE FOR WHOLESALE AND RETAIL SALES WITH ANCILLARY STORAGE AND WORKSHOP FACILITIES**

## Pre-Planning Advice

**27<sup>th</sup> April 2022 - PREAPP/22/00031**

### Principle of development

The proposal must be assessed against the objectives of relevant policies contained with the new adopted Luton Local Plan 2011-2031, a summary is provided below:

- ☑ Policy LLP1 – sets out a commitment to encourage growth and support sustainable development;
- ☑ Policy LLP14 - seeks to protect existing employment areas for B1, B2 and B8 uses unless they are longer suitable or required for those uses.
- ☑ Policy LLP15 – sets out the objectives for delivering housing across the Borough, section B in particular, indicates that planning permission will be supported on sites not allocated for housing provided that it would not lead to a loss of other uses for which there is a recognised local need and that new housing does not result in over-intensification of the site;
- ☑ Policy LLP21 - establishes the centre hierarchy within the Borough.
- ☑ Policy LLP25 – development proposals should enhance the distinctive character of the area responding positively to the townscape, street scene, site and building context, distinctiveness; provide new housing in accordance with Appendix 6;
- ☑ Policy LLP31 - requires the traffic implications of the development to be assessed in the context of their implications on the highway network;
- ☑ Policy LLP32 – seeks to manage parking provision to support growth;

The application site is an extended two storey building located on the corner of Legrave Road and Tudor Road, with the main building in retail use and the single storey rear outbuildings used as tyre repair facilities. The surrounding area is a mixture of commercial and residential uses.

The current proposal is seeking to demolish the existing single storey structures located to the rear of the main building and to erect a two storey rear extension to enlarge the existing retail accommodation in order to provide an additional retail unit on ground floor and to modify the layout to provide 2 flats on the upper floor. The proposal is also seeking to subdivide the plot and erect a detached one bedroom bungalow in the rear part of the site.

With respect to the proposed additional retail unit on the site whilst the front of the site is designated as being within the existing retail frontage, the rear is not and therefore any additional retail on this site would need to be justified within the context of Policy LLP21 of the Luton Local Plan. Part C of this policy states that the local planning authority will grant planning permission for retail development provided it is demonstrated that:



i. Retail proposals meet the sequential test; and ii. The vitality and viability of designated shopping areas would not be adversely affected by the development either on its own or in combination with other proposals or commitments.

No information has been submitted at part of this application to demonstrate that the scheme would meet the objectives of this policy. Any formal submission would need to provide a detailed statement that the 'sequential test' has been carried out to demonstrate that there are no other alternative suitable sites within existing retail centres that would be able to accommodate the proposed use and that the proposed use would not adversely affect the vitality and viability of existing centres. This is consistent with the advice given in 2018.

Policy LLP15 of the adopted local plan supports residential development on sites not allocated for housing provided that the proposal would not lead to the loss of other uses for which there is a recognised local need and would not result in over-intensified use of the site. This policy also requires new housing development to achieve a mix of different sizes, types and tenures to meet the housing needs of Luton and the Luton Housing Market Area as informed by the Strategic Housing Market Assessment (SHMA).

In this case the redevelopment of the rear part of the site would lead to the loss of an existing use, the tyre fitting business which is a Class B2 use, which would need to be justified within the context and objectives of Policy LLP 14 [b] in any formal submission. In addition whilst the scale and massing of the current scheme has been reduced from the 2018 scheme, the overall built form on the site would still represent a cramped and over-intensive form of development, especially the rear bungalow that would not only appear odd within the context of the surrounding built form but would also materially detract from the character and appearance of the surrounding area. Discussed in more detail in the heading below.

Policy LLP15 also requires new housing development to achieve a mix of different sizes, types and tenures to meet the housing needs of Luton and the Luton Housing Market Area as informed by the latest SHMA (Strategic Housing Market Assessment).

It is clear from the findings of the SHMA and the Strategic Housing Land Availability Assessment (SHLAA – 2018/2019) that there has been a significant over-delivery of 1 bed units within the Borough, with delivery exceeding the identified need by over 1,800 units in the first 5 years of the 20 year plan period. Therefore, the proposed 1 bed flat and 1 bed bungalow would not meet the housing needs of Luton and the Luton Housing Market Area. Any formal submission would need to justify the proposed mix of housing indicated. For the reasons outlined above and discussed below, the proposed dwelling would need to address the objectives of Policies LLP1, LLP15 and LLP25 of the Luton Local Plan and the core objectives of the NPPF to be considered acceptable as a matter of principle.

#### Design/ Impact on the Street Scene Surrounding Area

The application site is located on prominent corner plot that provides a sense of spaciousness about area. The current proposal is seeking a large two storey rear extension and a single storey detached building fronting onto Tudor Road frontage. Whilst it is noted that current extension to the main building is smaller in scale than the previous 2018 scheme, it still represents significant addition, nearly doubling the size of the rear element that will increase the overall massing of the built form along this frontage. I note that a large extension has been added on the rear of the adjoining property at No. 336 Leagrave Road, however owing to its position it does not have the same visually prominent effect as the current scheme. 5

Consideration will need to be given to further reducing the footprint of the proposed extension to reduce its prominence and impact on the street scene. A rough measurement of the plans appear to show that the roofline of the extension exceeds the height of the existing property and any application should be accompanied by streetscene views of Leagrave Road and Tudor Road showing the relationship of the extension to the existing and adjoining properties. With respect to the proposed detached single storey bungalow, notwithstanding the existing single storey structure on site, which already appears odd, the proposed bungalow by virtue of its height and form would represent an incongruous form of development at odds with the existing pattern of residential development within the area, which is mainly two storey dwellings. It also appears cramped and over-intensive given the limited plot size. It is not a form of development that sits comfortably or enhances the appearance or character of the surrounding area.

For the reasons outlined above the proposal would need to address the objectives of Policies LLP1, LLP15 and LLP25 of the Luton Local Plan in relation to the impact of the on the character and appearance of the surrounding area to be considered acceptable.

#### Impact on Adjoining Occupiers

As a result of its siting the property to be directly affected would be No. 340 Leagrave Road the attached property. In the absence of a block plan showing the relationship of the proposed extension with the existing extension at No. 340 it is unclear whether there would be any adverse effect on the amenities of this property.

The intensification of use of the site will also have an impact on the amenities of the adjoining occupiers in terms of additional noise and disturbance.

Any formal submission would need to address the issues raised above in relation to the impact of the development on the amenities neighbouring properties.

#### Suitability of the Living Environment

##### Layout

According to the internal layout plans submitted, all the habitable rooms within the proposed flats and bungalow would have window openings providing natural light and outlook for the future occupiers of these units.

##### Internal Space

In terms of internal space although the adopted plan is silent as far as internal space standards are concerned, one the core planning principle of the National Planning Policy Framework (the Framework) is to ensure a good standard of living conditions for all existing and future occupants of development and this principle is reflected in Policy LLP1 in the Local Plan, which presumes in favour of sustainable development

On the basis of the measurements provided on the floor plans it would appear that the proposed flats would accord with the internal space standards. For the proposed bungalow it would also appear to meet the nationally described standards on the basis of the measurements taken from the floor plan, however as part of any formal submission the internal floor for this element would need to be clearly indicated on the floor plans for avoidance of doubt.

### Amenity Space

Appendix 6 of the Local Plan requires a general provision of 90 m<sup>2</sup> of enclosed rear garden area for new dwelling houses other than 1-2 bedroom units where a lesser area will be considered but not less than 45m<sup>2</sup>.

On the basis of the submitted plans it would appear that proposed flats would have no amenity area and the proposed bungalow would have enclosed amenity area of less than 45m<sup>2</sup> a clear indication of the over-intensive nature of the development.

Any formal submission would need to justify the lack of the amenity space for the proposed flats and the reduced amenity provision for the proposed bungalow.

### Parking & Highway Implications

In accordance Appendix 2 a maximum of 4 parking spaces would be required for the proposed flat. No car parking provision has been shown for the proposed scheme. More sustainable modes of transport should also be considered and accommodated within the scheme.

Any formal submission would need to justify the lack of parking provided in this instance.

### Conclusion

On the basis of the foregoing, it is considered that the proposed development is unacceptable in terms of its principle, unless the proposal can be justified in relation to Policies LLP1, LLP14, LLP15, LLP21 and LLP25. Additionally, any harmful effect on the character/ appearance of the area, amenities of the existing and future occupiers and lack of parking would need to be justified in any formal planning application submitted. As a result the proposal in its current form would be conflict with the objectives of policies LLP1, LLP14, LLP15, LLP21, LLP25, LLP31 and LLP32 and therefore is unlikely to be considered favourably if submitted on a formal basis.

Whilst the response is largely negative in content, I have only sought to offer you the kind of advice that would be applied to the proposal if submitted on the basis of a formal planning application. I trust therefore it is of some help. Should you have any further queries please do not hesitate to contact me on the number provided.

## **21st October 2022 - PREAPP/22/00133**

### Principle of development

The proposal must be assessed against the objectives of relevant policies contained with the new adopted Luton Local Plan 2011-2031, a summary is provided below:

- ☑ Policy LLP1 – sets out a commitment to encourage growth and support sustainable development;
- ☑ Policy LLP14 - seeks to protect existing employment areas for B1, B2 and B8 uses unless they are longer suitable or required for those uses.
- ☑ Policy LLP15 – sets out the objectives for delivering housing across the Borough, section B in particular, indicates that planning permission will be supported on sites not allocated for housing provided that it would not lead to a loss of other uses for which there is a recognised local need and that new housing does not result in over-intensification of the site;

- ☐ Policy LLP21 - establishes the centre hierarchy within the Borough.
- ☐ Policy LLP25 – development proposals should enhance the distinctive character of the area responding positively to the townscape, street scene, site and building context, distinctiveness; provide new housing in accordance with Appendix 6;
- ☐ Policy LLP31 - requires the traffic implications of the development to be assessed in the context of their implications on the highway network;
- ☐ Policy LLP32 – seeks to manage parking provision to support growth;
- ☐ Policy LLP37 (Climate Change, Carbon and Waste Reduction and Sustainable Energy): considers the climate change implications of development;
- ☐ Policy LLP38 (Pollution and Contamination): relates to dealing with land contamination and environmental implications associated with development; and

The application site is an extended two storey building located on the corner of Leagrave Road and Tudor Road, with the main building in retail use and the single storey rear outbuildings used as tyre repair facilities. The surrounding area is a mixture of commercial and residential uses. The current proposal is seeking to demolish the existing single storey structures located to the rear of the main building, erect approximately 4.2 m wide two storey rear extension and to revise the internal layout of both the ground floor and first floor. At present according to the submitted existing floor plans, the ground floor has 3 small retail units and the first floor is either 3 studio flats or shared accommodation in the form of a HMO. It is not clear from the submitted layout.

Under the previous pre-app enquiry submitted earlier this year, an additional retail unit was proposed on the ground floor, which was considered unacceptable as matter of principle as it failed to meet the ‘sequential’ policy requirements of Policy LLP21 of the Luton Local Plan. The current proposal is seeking to reduce the overall number of retail/commercial units on the site from 3 to 2 and to provide larger retail units. The extension of existing units would not require the applicant to demonstrate compliance with the requirements of the ‘sequential test’. However, I would recommend that in the formal planning statement you clearly indicate whether there would be overall reduction in the commercial use on the site especially with the removal of tyre repair facilities at the rear and the loss of one of the retail units at the front.

Policy LLP15 of the adopted local plan supports residential development on sites not allocated for housing provided that the proposal would not lead to the loss of other uses for which there is a recognised local need and would not result in over-intensified use of the site. This policy also requires new housing development to achieve a mix of different sizes, types and tenures to meet the housing needs of Luton and the Luton

Housing Market Area (LHMA) as informed by the Strategic Housing Market Assessment (SHMA). The proposed enlarged 3 bedroom flat would provide a large family unit that would contribute towards identified need of the LHMA. As part of any formal submitted please clearly indicate whether the existing first floor consists of studio flats or shared accommodation as it is not clear from the submitted plans.

In this case the redevelopment of the rear part of the site would lead to the loss of an existing use, the tyre fitting business which is a Class B2 use, you have looked at this issue in your planning statement, however it has not been fully addressed within the context of Policy LLP14 [b]. As part of any formal submission you need to clearly to indicate how the development meets the different objectives of this policy, although the loss of a use which has resulted in anti-social behavior is welcomed.



In addition to the above, owing to the significant reduction in the scale of the development in comparison to the previous schemes the proposal would not represent a cramped or over-intensive form of development, however some further modifications are still required to reduce the massing of the building, which will be discussed in more detail in the heading below. For the reasons outlined above and discussed below, the proposed dwelling would need to address the objectives of Policies LLP1, LLP14, LLP15 and LLP25 of the Luton Local Plan and the core objectives of the NPPF to be considered acceptable as a matter of principle.

#### Design/ Impact on the Street Scene Surrounding Area

As a result of its siting and prominent corner location of the site the proposed development would have an impact on the appearance and character of Tudor Road. Whilst it is acknowledged that the current scheme has made significant reduction in the scale of the development from the previous schemes to reduce its prominence and massing, there is still scope for further revisions to reduce the visual impact of the development on the appearance of the surrounding area. It is considered that proposed extension needs to be set back at least 1 metre from the front elevation of existing first floor projection along the Tudor Road frontage, which will not only help to break the massing of the built form but also provide the necessary subordination as it would reduce the ridge height of the extension. The set-back will give a staggered building line reducing the visual prominence of the extension. By setting back the building there may be an opportunity for a small balcony to be introduced at the first floor, which would further help break up the elevation and improve the appearance of the building. It may also provide an opportunity for some amenity space for the first floor flat. However the design the balcony will be key to its overall suitability.

From the submitted plans it is not clear if the height of the existing building is being raised as part of this scheme, however as part of any formal submission please provide a street scene views of development both within the context of Leagrave Road and Tudor Road showing the relationship of the extension to the existing and adjoining properties.

For the reasons outlined above the proposal would need to address the objectives of Policies LLP1, LLP15 and LLP25 of the Luton Local Plan in relation to the impact of the on the character and appearance of the surrounding area to be considered acceptable.

#### Impact on Adjoining Occupiers

As a result of the position of proposed extension the only property to be directly affected would be No. 340 Leagrave Road the attached property. On the basis of the submitted block plan it would appear that the revised extension would not project forward of the extension at the rear of No. 340, which would mean that it would have no adverse effect on the amenities of this property. However in any formal submission the relationship between the proposed extension and the first floor extension at No. 340 needs to be clearly shown.

From the submitted plans it would appear the current scheme would lead to less intensification of use of the site meaning that the current proposal would have less of an impact in terms of noise and disturbance.

#### Suitability of the Living Environment

##### Layout

According to the internal layout plans submitted, all the habitable rooms within the enlarged flat would have window openings providing natural light and outlook for the future occupiers of these units.

### Internal Space

In terms of internal space although the adopted plan is silent as far as internal space standards are concerned, one the core planning principle of the National Planning Policy Framework (the Framework) is to ensure a good standard of living conditions for all existing and future occupants of development and this principle is reflected in Policy LLP1 in the Local Plan, which presumes in favour of sustainable development

On the basis of the measurements provided on the floor plans it would appear that the proposed 3 bed/5 person unit would fall short of the nationally described space standards which require 86 m<sup>2</sup> whereas the submitted plans show 81m<sup>2</sup>.

Any formal submission would need to ensure that the proposed flat meets the nationally described space standards.

### Amenity Space

Appendix 6 of the Local Plan for flatted developments requires a minimum of 5m<sup>2</sup> of private outdoor space should be provided for 1 - 2 persons flats and maisonettes and an extra 1m<sup>2</sup> should be provided for each additional occupant. In this case 8m<sup>2</sup> would be required for the development.

On the basis of the submitted plans it would appear that enlarged flat would have no amenity provision. Any formal submission would need to justify the lack of the amenity space for the enlarged flat.

### Parking & Highway Implications

In accordance with Appendix 2 a maximum of 2 parking spaces would be required for the proposed flat. The submitted plans show 3 parking spaces and cycle store located to the rear of the site, it is not clear if these are all for the enlarged flat or divided between the retail and residential use. Also there is requirement for electrical charging points for new developments. Any formal submission would need to clearly allocate the parking and cycle spaces and show EV charging points on a plan for avoidance of any doubt.

### Other Matters

The Council has adopted a commitment to make Luton a carbon neutral town by 2040 and the Local Planning Authority would wish to see any development proposal on this site be an exemplar of sustainability considering renewable technologies, localised heating systems and biodiversity enhancements where possible. You may also already be aware of the new requirements under the recent Building Regulations legislation relating to ventilation, conservation of fuel and power, overheating and infrastructure for charging of electric vehicles which would need to be accounted for during the design stages of the development.

## Conclusion

On the basis of the foregoing, it is considered that whilst the revised scheme has addressed some of the previous concerns it has not fully overcome all the issues. The revised scheme therefore remains still unacceptable in terms of its principle, unless the proposal can be justified in relation to Policies LLP1, LLP14, LLP15, LLP21 and LLP25. Additionally, any harmful effect on the character/appearance of the area and the amenities of the future occupiers would need to be justified in any formal planning application submitted. As a result the proposal in its current form would be conflict with the objectives of policies LLP1, LLP14, LLP15, LLP21, LLP25, LLP31 and LLP32 and therefore is unlikely to be considered favourably if submitted on a formal basis.

## PURPOSE OF DOCUMENT

This design and access statement has been prepared in support of a planning application for the proposed ground floor reinstatement of original 2 units and a 2 bed flat to first floor. This planning application has been prepared on behalf of the property owners HBK Investments Ltd.

This Design and Access Statement will demonstrate the following:

- That the proposal is taking Planning Policy requirements and previous pre-application comments into consideration;
- That the proposal would not negatively impact neighbouring amenity and would constitute high quality design;
- That the proposal is going to improve the quality of the area;
- That the proposal shall provide additional housing units making an important contribution to the growing Luton Borough area;

In determining the scheme, the following plans and drawings should be considered:

- AD-00-01 A - Existing Plans
- AD-00-20 A - Existing Elevations
- AD-01-01 - Proposed Plans
- AD-01-20 - Proposed Elevations
- AD-01-30 - Car Workshop Drawing
- AD-OS - OS Map
- PLANNING STATEMENT 338 LEAGRAVE ROAD, BEDFORDSHIRE LU3 1RE 2



Aerial image of site

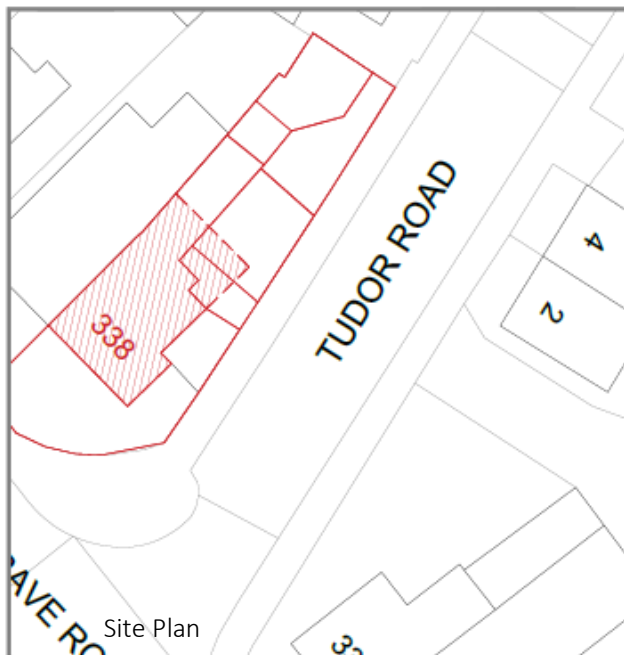
DESIGN PROPOSALS

LAYOUT

The following pages show the building in the context of the site and the proposed floor plans which demonstrate the proposals to the scheme.

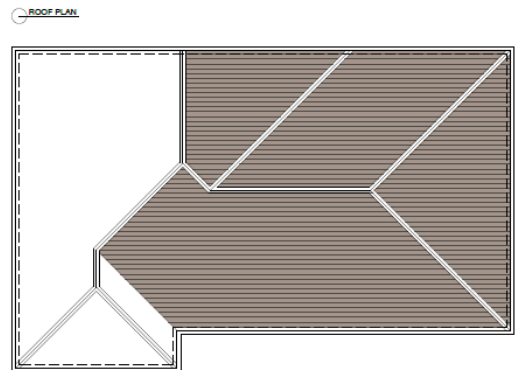
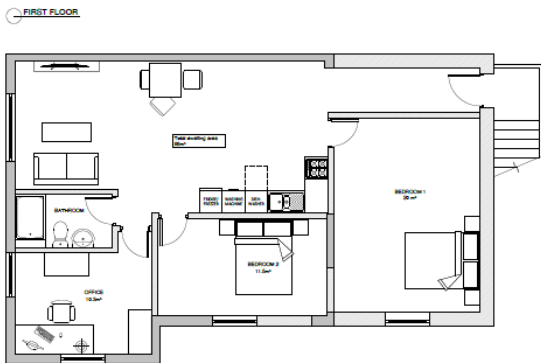
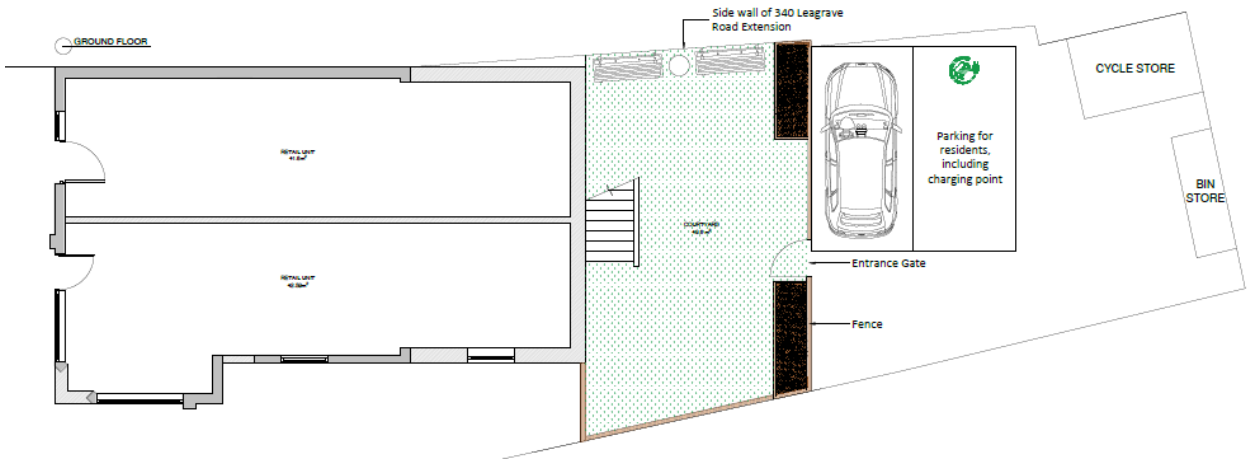
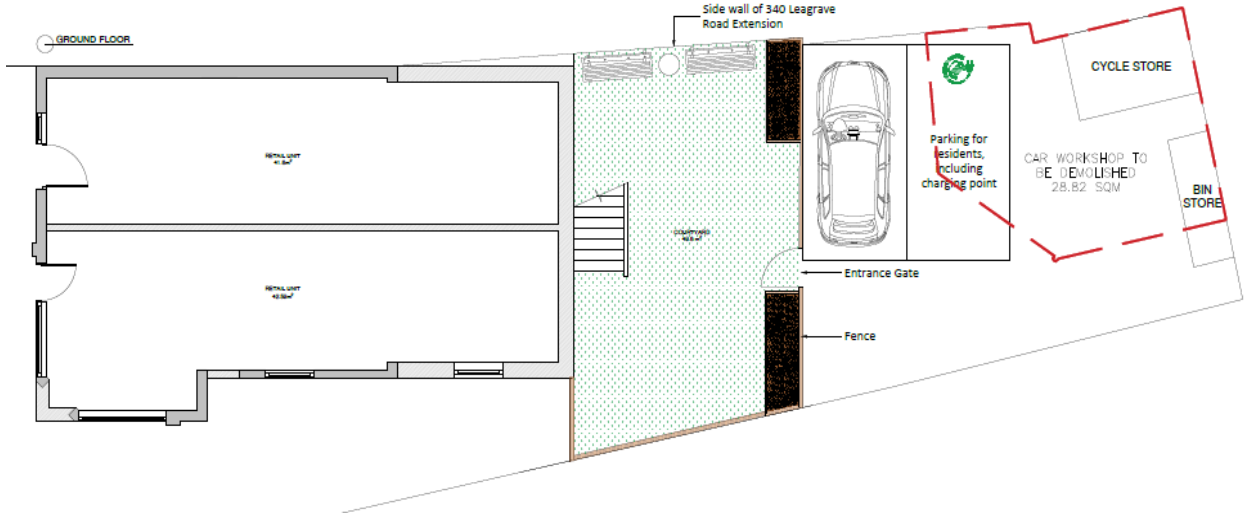


OS Map



Site Plan

Proposed floor plans





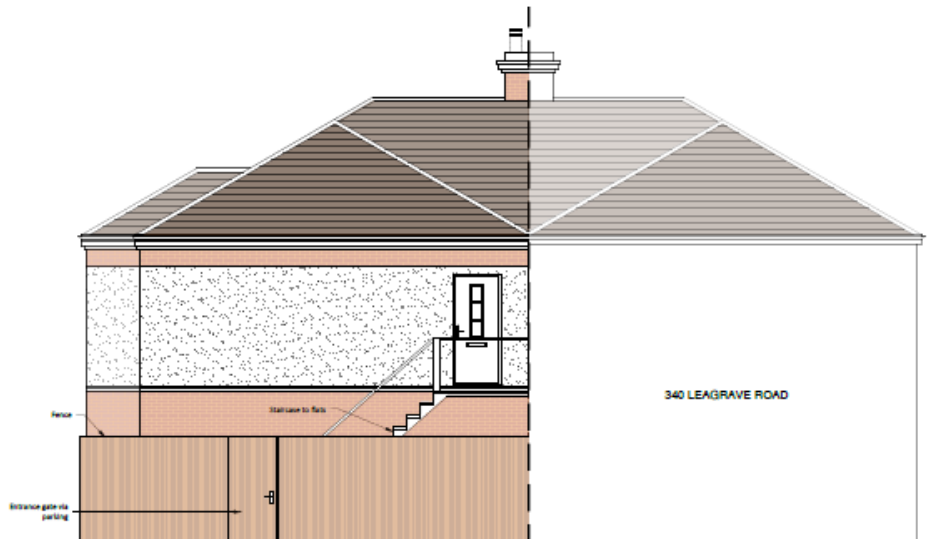
Proposed elevations



PROPOSED SIDE ELEVATION & TUDOR ROAD STREET SCENE



PROPOSED FRONT ELEVATION & LEAGRAVE ROAD STREET SCENE



REAR ELEVATION

## THE DESIGN

This proposal is to reinstate the original 2 ground floor retail units. A double storey side extension & demolition of the extant buildings used in conjunction with the existing tyre business on site, will allow for a 2 bed flat to the first floor. The retail units and first floor flat will be as per the schedule below:-

- Ground floor Retail Unit 1 - 41.6m<sup>2</sup>
- Ground floor Retail Unit 2 - 42.59m<sup>2</sup>
- 1 no. two bed unit with a total dwelling are of 86m<sup>2</sup>

The above residential accommodation is in compliance with the Technical Housing Standards – Nationally Described Space Standard.

The layout of the proposed site has been formulated by both previous pre-application consultations (descriptions provided in earlier pages relating to the preapplication advice).

The current proposal will result in the cessation of a car workshop/tyre business primarily within a residential area in what only can be described as a very unattractive building and a constant overflow of cars on the street, taking away from residential parking.

The entrance to the residential unit is wholly separate from the entrance to the ground floor units. The proposed residential unit at first floor level has a dedicated amenity area of 49.6m<sup>2</sup>.

Windows are not present in the north & northwestern face of the two storey element of the extension which is in close proximity to no. 340 Leagrave Road.

The property at No. 338 Leagrave Road is a property in retail use at ground floor level, while the first floor is a residential flat.

The detailed design of this unit portrays a typical Edwardian style.

Bin storage & the cycle store will be located within the boundary of the site. A central cycle storage area is proposed which will accommodate 5 no. bicycles.

It is envisaged that due to the limited size of the commercial operation arising's from the units in terms of waste, this will be collected at a frequency to suit their extent by commercial waste disposal operative.

The first floor element of the application at the side proposes 1 no. residential accommodation unit on part of the car workshop/tyre business that is being demolished and the courtyard.

## THE DESIGN

It is believed that the current design now accords with all Policies and Design Guides, respects the amenity of adjacent properties and also that of the proposed accommodation in terms of inter-visibility, private space and visual intrusion, moreover the proposal is now for a double storey side extension which reflects the immediately adjacent properties.

The property at No. 338 Leagrave Road is currently a property in commercial use at ground floor level (x3 retail units), with the first floor is a residential flat.

Our proposal is to demolish the existing car workshop/tyre business which sits on the site as a single storey structure.

The first storey unit is specifically designed for its location with all of the windows facing south east maximising daylight and sunlight penetration into the proposed new dwelling whilst maintaining the privacy of adjacent residential properties.

There are no windows proposed overlooking the adjacent properties at No.1 Tudor Road & No. 340 Leagrave Road. There will be no detriment to the amenities of the current property with the implementation of the current proposal.

There are no immediate residential properties with windows facing the proposed double storey extension.

A dedicated amenity area of some 49.6m<sup>2</sup> is proposed for this unit.

The pre application advice advised the following: It is considered that proposed extension needs to be set back at least 1 metre from the front elevation of existing first floor projection along the Tudor Road frontage, which will not only help to break the massing of the built form but also provide the necessary subordination as it would reduce the ridge height of the extension. The set-back will give a staggered building line reducing the visual prominence of the extension. By setting back the building there may be an opportunity for a small balcony to be introduced at the first floor, which would further help break up the elevation and improve the appearance of the building. It may also provide an opportunity for some amenity space for the first floor flat. However the design the balcony will be key to its overall suitability. **Within our set of drawings this has not been implemented. The reasons for this being roof design, appearance, & space standards.**

**By not stepping in the extension, the external appearance of the building flows better. It also helps to produce the appearance of the extension looking like part of the existing building. It also mirrors the extension at No. 340 Leagrave Road somewhat.**

## THE DESIGN

Another issue with stepping in the extension would be that the roof design would become unnecessarily complicated. As it has been designed, the roof displays a clean visual aesthetic. The final point being that stepping in the extension would make it extremely difficult to achieve the space standards.

The pre-application advice states:

From the submitted plans it is not clear if the height of the existing building is being raised as part of this scheme, however as part of any formal submission please provide a street scene views of development both within the context of Legrave Road and Tudor Road showing the relationship of the extension to the existing and adjoining properties.

As part of this proposal, a street scene has been produced which along with the elevations, illustrates that the height of the existing building will not be raised, but instead subservient to the existing roof heights.

The pre-application advice states:

### *Amenity Space*

Appendix 6 of the Local Plan for flatted developments requires a minimum of 5m<sup>2</sup> of private outdoor space should be provided for 1 - 2 persons flats and maisonettes and an extra 1m<sup>2</sup> should be provided for each additional occupant. In this case 8m<sup>2</sup> would be required for the development.

On the basis of the submitted plans it would appear that enlarged flat would have no amenity provision. Any formal submission would need to justify the lack of the amenity space for the enlarged flat.

Our proposal incorporates an amenity space of 49.6m<sup>2</sup>.

The pre-application advice states:

In accordance with Appendix 2 a maximum of 2 parking spaces would be required for the proposed flat. The submitted plans show 3 parking spaces and cycle store located to the rear of the site, it is not clear if these are all for the enlarged flat or divided between the retail and residential use. Also there is requirement for electrical charging points for new developments.

Any formal submission would need to clearly allocate the parking and cycle spaces and show EV charging points on a plan for avoidance of any doubt.

As part of our proposal, we have shown 2 parking spaces to be allocated to the proposed flat with electrical charging points. A cycle store is also provided for the flat, that can accommodate a minimum of 5 cycle spaces.

## CONCLUSION

Having sought previous pre-application with the local planning authority , we feel we have acknowledged the council requirements. Thus, coming to the conclusion that the cessation of the tyre/workshop commercial use will be of benefit to both the environment and the local residents.

Having thoroughly examined all available options for development, we have come to the conclusion that this is the most viable development option to proceed with.

We believe that the application is now compliant to the local planning policy and should thus be looked upon favorably.