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FAO Joe Aggar

Dear Joe,

**The Goat public house, 250 High Street, Ponders End, EN3 4HB
Planning application**

On behalf of Ponders End Properties Ltd I write to submit a planning application for:

“Demolition of a rear extension of The Goat public house, re-provision of pub floorspace in a single storey side extension with a roof terrace, and development of car park to the rear of The Goat public house to provide nine dwellings in a two storey plus loft accommodation building with associated car parking, cycle storage and refuse and recycling storage”.

Submitted via the planning portal with this letter are:

- Application form and Certificate A
- Location plan
- Existing and proposed plans, elevations and sections
- Images of proposed scheme
- Design & Access Statement
- Heritage Statement
- Transport Statement
- Noise Impact Assessment
- Daylight and Sunlight Assessment

Payment of £5,544 has been made to the Planning Portal.

Site description

The site (comprising the pub and the car park to the rear) was purchased by Ponders End Properties (PEP) from the brewers Greene King in 2018. PEP will run the pub as a going concern.

The Goat is a three storey building on the corner of the High Street and Queensway. The main building is of 1930's construction in the mock Tudor tradition. It has modern single extensions to the rear (west) of the main building which house both the kitchen and saloon. The public rooms and bar are situated on the ground floor with staff accommodation upstairs and a beer cellar below.

At the front of the pub (east) is a cobbled service road (with access to the cellars and where the pub is serviced from). Across the High Street is a four storey residential building (nos. 229-245).

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The pub garden is to the north of the pub with iron railings between it and the service road. The garden is covered with a sun / rain awning.

Further to the north is a restaurant (250a High Street) and then a sweeping parade of shops with two storeys of accommodation above.

To the rear of the pub is its car park. Planning permission has been granted for the temporary use of the car park as a car wash (ref 18/00554/FUL). The permission will allow a temporary, productive use whilst options for development are considered. Beyond this is a large car park servicing the Tesco supermarket.

To the south, across Queensway is a tyre fitters and a two storey light industrial building. Adjacent and behind is the newly developed Electric Quarter featuring, at the nearest point to the pub, a four storey, flat roofed building.

Designations

The pub is locally listed but does not lie within a conservation area.

The site falls within a Place Shaping / Regeneration Priority Area and a Local Centre (centred on the High Street). To the south and west is a Locally Significant Industrial Site. To the south along the High Street and behind Queensway is the Electric Quarter, a large residential development that appears to be nearing completion.

The nearest residential buildings of the Electric Quarter are four storeys. Across the High Street at no.229-245 is a four storey residential building. The buildings to the north are (with the exception of the neighbour at 252) three storeys.

The site is 0.1 ha. It has a PTAL rating of 4 (where 0 is worst and 6a is best). It is defined as 'Urban' according to policy 3.4 of the London Plan.

The site is in Flood Zone 1 and is not at risk of flooding. It is not in a critical drainage area.

Planning history

Planning permission has been granted for the temporary use of the car park as a car wash (ref 18/00554/FUL).

Pre-application advice was sought from the Council in two stages. A first scheme for 20 flats in two buildings of four storeys was submitted in July 2018 (ref. 18/02781/PREAPP). Following a site visit attended by the planning officer on informal advice issued.

The informal advice was, in summary:

- The principle of development is acceptable noting there is no loss in pub floorspace.
- No objection in principle to the loss of rear extensions
- The scale and mass of the residential building is too great and would dominate the pub
- Development should front onto and address Queensway.

Further to the informal advice a second scheme for 18 flats in one building of part three, part four storeys was drawn up and submitted to the Council in December 2018 (ref. 19/00079/PREAPP). A meeting was held at the Council offices with the planning officer and conservation officer. Formal advice was issued in March 2019. A summary of that advice and how this application proposal responds to it is set out in the Assessment section.

It is worth noting that the applicant was advised in the pre-application meeting that a potential means of dealing with a number of the Council's concerns would be to bring forward a scheme of less than ten units.

Development Proposal

The description of development is:

“Demolition of a rear extension of The Goat public house, re-provision of pub floorspace in a single storey side extension with a roof terrace, and development of car park to the rear of The Goat public house to provide nine dwellings in a two storey plus loft accommodation building with associated car parking, cycle storage and refuse and recycling storage”.

Pub

The proposed demolition of pub floorspace amounts to 125 sqm.

The proposed new pub extension amounts to 153 sqm.

Single storey modern extensions will be demolished. These house a function space or saloon bar, kitchen, stores and w/c.

A new single storey side extension (to the north) will be built. This will help form a more cohesive pub space with an improved and more accessible kitchen. The extension will feature large, windows to the front creating an active frontage and the connection between the old and the new will be clearly defined in a glazed setback at the connection point.

A roof terrace will sit on top of the extension to [provide outside space for the pub. A small bar and storage area to the rear will provide a buffer between the terrace and the residential development behind it.

Residential

Nine flats are proposed across two storeys plus loft accommodation in the following unit mix.

- 5 x 1-bed / 2-person
- 2 x 2-bed / 4-person
- 2 x 3-bed / 4 person

The height of the building is lower than the height of the pub and its primary frontage is to Queensway. Each unit meets London Plan space standards (including storage space) and is provided with good quality, private amenity space. One unit is designed to meet Building Regulations M4(3) (wheelchair accessible).

Five car parking spaces are provided, including one Blue Badge space, to the rear of the site with access from Queensway. Turning space is available so the site can be accessed in forward gear.

Secure storage is provided for 16 bicycles plus two visitors spaces.

Planning Policy

London Plan (2016)

Policy 2.6 - Outer London: Vision and Strategy

Policy 2.8 – Outer London: Transport

Policy 3.3 – Increasing housing supply

Policy 3.4 – Optimising housing potential

Policy 3.5 – Quality and design of housing development

Policy 3.8 – Housing choice

Policy 3.9 – Mixed and balanced communities
 Policy 3.13 – Affordable housing thresholds
 Policy 5.1 - Climate change mitigation
 Policy 5.2 - Minimising carbon dioxide emissions
 Policy 5.3 - Sustainable design and construction
 Policy 5.13 - Sustainable drainage
 Policy 5.15 - Water use and supplies
 Policy 6.3 – Assessing effects of development on transport capacity
 Policy 6.9 – Cycling
 Policy 6.13 - Parking
 Policy 7.1 - Building London’s neighbours and communities

Core Strategy (adopted October 2010) ('CP' policies)

CP2 - Housing Supply and Locations for New Homes
 CP3 - Affordable Housing
 CP4 - Housing Quality
 CP5 - Housing Types
 CP6 - Meeting Particular Housing Needs
 CP20 - Sustainable Energy use and Energy Infrastructure
 CP21 - Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure
 CP24 - The Road Network
 CP25 - Pedestrians and Cyclists
 CP30 - Maintaining and Improving the Quality of the Built and Open Environment
 CP31 - Built and Landscape Heritage
 CP32 - Pollution
 CP36 - Biodiversity
 CP41 - Ponders End

Development Management Document (adopted November 2014) ('DMD' policies)

DMD3 - Providing a Mix of Different Sized Homes
 DMD6 - Residential Character
 DMD8 - General Standards for New Residential Development
 DMD9 - Amenity Space
 DMD10 – Distancing
 DMD 16 - Provision of New Community Facilities
 DMD37 - Achieving High Quality and Design-Led Development
 DMD45 - Parking Standards and Layout
 DMD47 - New roads, access and servicing
 DMD48 - Transport Assessments
 DMD51 - Energy efficiency standards
 DMD58 - Water Efficiency
 DMD61 - Managing surface water
 DMD68 - Noise
 DMD81 - Landscaping

Other Material Considerations

National Planning Policy Framework
 National Planning Practice Guidance
 London Housing SPG
 North East Enfield AAP
 Draft London Plan
 Refuse and Recycle Storage Guide Enfield (ENV 08/162)
 S106 Supplementary Planning Document (2016)

Assessment

The design response to pre-application advice has been fundamental to the development of the proposals. Set out below is a summary of the Council's advice of the scheme put forward for advice in December 2018, limited to where the Council had concerns, and the design response seen in the application submission.

Council's formal pre-application advice	How the application proposal responds to the advice
<p><u>Impact of the new residential building on pub</u></p> <p>It is considered the proposed built form which runs perpendicularly to the locally listed building would reduce the prominence of this corner building and fail to respect the townscape hierarchy.</p> <p>The 3 storey elements shoulder height would rise above the locally listed building and this would be further exacerbated by four storey elements beyond. Therefore, the proposal would read as taller than the adjoining locally listed building. Therefore, its relative height would, be at odds with the non-designated heritage asset.</p>	<p>The size of the building has been reduced being only two storeys plus loft accommodation at its highest point, and lower the pub at all times.</p> <p>Pitched roofs present a less dominating backdrop to the pub, also responding to the form of the gable wall of the pub allowing its side elevation to become part of the streetscape by following its silhouette.</p> <p>A significant gap between the new residential building and the pub reduces the development's potential impact as the gap prevents conflict with the pub's south elevation.</p>
<p><u>Connection between the pub and new extension</u></p> <p>It is considered a glazed link is required (ideally double height, frameless structural glazing) to create a visual break between old and new. This could also afford views through to the back of the site and offer oblique views of the flank elevation of the locally listed building.</p>	<p>The point at which the new extension connects to the original building is defined by a setback to better reveal the original building. The link is also glazed so that the flank wall of the original pub will be seen within. It ensures that the new extension does not compete with the existing building as it allows the side (north) elevation of The Goat to be viewed, thereby retaining its 'detached' status.</p>
<p><u>Redevelopment of the Tesco car park</u></p> <p>There is concern regarding the effect that the application development would have on the general redevelopment potential of the adjoining site.</p> <p>The Tesco site is of strategic importance and any development at 250 The High Street should not prejudice the redevelopment of the area.</p> <p>You should have regard to Policy DMD10 and the distancing requirements to site boundaries.</p>	<p>The development primarily addresses Queensway (including front doors to the street creating an active frontage) with only a limited part of the development addressing the Tesco car park on the east elevation.</p> <p>It is reasonable to expect any future development of the Tesco car park would require and access road in. It is also reasonable to expect that road would run alongside the boundary of the application site. With pavements and allowing for two way traffic the width of the road would leave over 25m between windows</p>

	<p>of this and some other, as yet proposed, future development.</p> <p>Whether development proposals should be held to ransom by future, unplanned development is dealt with later in the assessment section.</p>
<p><u>Housing mix</u></p> <p>Having had regard to the site's local centre location, directly adjacent to a pub and lack of opportunity for private gardens for larger households the site does not lend itself to supporting family accommodation (3+ bedrooms). However, the applicant is advised to provide a larger range of 2 bed, four-person units, as these provide a greater degree of flexibility for future occupants.</p>	<p>The proposed development now includes two 3-bed flats although it is noted these accommodate 4 people. As a result the split between 2-person and 4-person properties is 55% to 45%.</p>
<p><u>Affordable housing</u></p>	<p>Affordable housing is not relevant to minor development proposals.</p>
<p><u>Outlook and privacy</u></p> <p>There is the potential for direct overlooking into habitable windows.</p> <p>There is also a lack of defensible space with some habitable windows being hard up against the back edge of the curb. Again, this would give the impression of being overlooked from the public realm and compromise the living conditions of future occupiers.</p>	<p>Ground floor residential windows are inevitable and are found in a very wide range of residential development.</p> <p>The building line has been pulled back from the boundary line and planting has been incorporated into the design to form a defensible space that protects the privacy of the residents within.</p> <p>There are no ground floor bedrooms fronting Queensway.</p>
<p><u>Private amenity space</u></p> <p>There are private balconies proposed. Some of these are located at ground floor with little relief to the rear of these units. The units would become reliant of these front outdoor spaces at ground level and it is considered likely ad hoc screening would be erected.</p>	<p>Private balconies are only provided at the upper floors to avoid this space being exposed to passers-by on the pavement.</p>
<p><u>Noise</u></p> <p>The first-floor roof terrace may give rise to increased noise levels given its elevated position from people gathering at roof level. Any potential sensitive receptors should be identified to ensure there is not adverse impact from the first-floor roof terrace, from the first floor level pub roof terrace</p>	<p>The small bar and storage area to the rear of the roof terrace bar area creates a buffer between the pub and residential uses. A noise assessment has been prepared and this demonstrates that noise impacts will be acceptable.</p>

<p><u>Highways</u></p> <p>The provision of 5 spaces is below the standards set out in the London Plan and there is the strong likelihood of overspill on to the adjoining highway given the number of units proposed. It is noted that the PTAL is only 4, which is moderate, so a full relaxation of the parking standards would not be appropriate.</p>	<p>The amount of residential units has been halved and the parking to unit ratio is now 0.5.</p>
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Principle of development

The existing modern rear extensions of the pub are poorly designed, poorly configured and have no heritage value. Their demolition and the replacement of the floorspace will allow the pub to function better with better toilets, a better kitchen (and subsequent food offer) and a more open seating arrangement. Whilst the existing pub garden is valued by customers it is not the most inviting space. It will be re-provided as a better quality first floor terrace. The reconfigured pub will experience a slight uplift in floorspace.

The retention and improvement of the pub accords with policy DMD17 which seeks to protect community uses, including pubs, and the guidance of the Social Infrastructure SPG.

The car park is in use as a car wash under a temporary planning permission. Because the car park is not ancillary to the pub its loss and the introduction of residential units, supported by policies CP40 and CP41, is therefore acceptable. This conclusion is found in the pre-application advice.

Density of residential accommodation

Policy 3.4 (Table 3.2) of the London Plan sets standards for appropriate density levels with regards to location, existing building form, massing, and having regard to the PTAL (Public Transport Accessibility Level) score. Table 3.2 shows that this site is capable of supporting a density of between 70 and 260 units per hectare at this Urban location.

Policies D2 and D6 of the draft London Plan is clear that the optimum density of development is dependent upon a design led approach. Bearing in mind the very clear pre-application advice provided by the Council on design (discussed later in this section), the density provided is the optimum for this site.

Housing mix

The Core Strategy housing mix requirement (policy CP5) is for:

Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons).

The proposal provides 55% 1-bed / 2-person flats and 45% 2 & 3-bed / 4 person flats. It is not possible to provide adequate amenity space or playspace for children on this site. The site is located close to a busy main road and the nearest playground is to the south across the High Street. This is in line with policy DMD73 and is aligned with the advice received in pre-application.

The proposal provides a comparable proportion of family sized dwellings to consented schemes at:

- 17/01864/FUL Capitol House, 794 Green Lanes N21 2SH
- 17/02599/FUL 179 Hertford Rd EN3 5JH

- 17/03634/FUL 413 Green Lanes N13 4JD
- 16/01561/FUL Deimel Fabrics Park Ave N18 2UH

Design & Heritage

Further details of the design are shown in the Design & Access Statement. The design has been carefully considered to respond to local area and the locally listed pub.

The main body of the pub is retained in recognition of its value as a locally listed building. The side extension of the pub is stepped in and limited to a single storey to allow an appreciation of the pub when travelling south down the High Street. The extension of the pub features windows out on to the street to provide an active frontage in accordance with policy DMD40.

The residential building is set away from the pub leaving a significant gap where pub can be seen in full from Queensway. Currently the unsatisfactory single storey extensions compromise this view.

The height of the building is only two storeys plus loft accommodation at its highest point, and lower the pub at all times. Pre-application advice was that a new building should be subservient to the pub. It is and this is demonstrated in the images available in the Design & Access Statement.

Pitched roofs present a less dominating backdrop to the pub and help to reduce the mass of the building. They also respond to the form of the gable wall of the pub allowing its side elevation to become part of the streetscape by following its silhouette.

A significant gap between the new residential building and the pub reduces the development's potential impact as the gap prevents conflict with the pub's south elevation.

The point at which the new extension connects to the original building is defined by a setback to better reveal the original building. The link is also glazed so that the flank wall of the original pub will be seen within. It ensures that the new extension does not compete with the existing building as it allows the side (north) elevation of The Goat to be viewed, thereby retaining its 'detached' status.

The Heritage Statement submitted with this application says in its Executive Summary:

"The refurbishment works to the existing building will ensure its continuing presence on the High Street as a locally recognised landmark and an easily identifiable hub of social recreation. The removal and reconstruction of the extensions to a design which at once respects the scale and rhythm of The Goat, but also identifies a new chapter in the building's history, enhance its status. The proposed residential buildings respond to the pitched-roof gabled envelope of the heritage Asset and to the historic mills and warehouses once a feature of the area, but the detail and construction is undoubtedly modern therefore identifying itself as a new stage in The Goat and the site's history".

The Conclusion says:

"The proposed development therefore causes no harm to the Setting and Significance of The Goat public house – the Heritage Asset - nor does it cause harm to the Setting and Significance of other designated Heritage Assets in the vicinity" (para. 5.7).

As a whole the proposed design sits comfortably within its surroundings and has due regard for the locally listed pub building in accordance with policies DMD 37 and 44.

Amenity

Policy DMD68 part 3 says:

“Development involving noise sensitive uses close to sources of significant noise will only be permitted if mitigation measures reduce noise to an acceptable level to safeguard the amenity of future occupiers. Applications must be accompanied by a noise assessment to demonstrate that occupiers/users will not be exposed to unacceptable levels of noise, having regard to relevant noise exposure categories noise standards and corresponding advice”.

The pub is an existing use and there will be only a very minor increase in floorspace. It follows that there will be no increase in the intensity of the pub use.

The potential impact of the pub on new residential dwellings has been considered carefully. The design includes a small bar and storage area at the rear of the roof terrace to act as a buffer between the part of the pub most likely to cause disturbance.

A noise impact assessment has been undertaken to assess the current level of noise created by the pub. The potential impact of the continued pub, taking into account the new roof terrace above the site of the existing pub garden, is then assessed.

The noise assessment concludes:

“Noise impact of the nearby public house has been considered in line with the requirements of the Local Authority.

“Mitigation advice, including the use of suitably specified glazing and acoustically attenuated ventilation, have been recommended to reduce to a minimum the adverse impact on health and quality life arising from environmental noise.

“The assessment shows the site, subject to appropriate mitigation measures, is suitable for residential development in terms of noise.

A daylight / sunlight assessment has been undertaken. This demonstrates that there will be no impact on neighbouring dwellings”.

Policy DMD6 seeks to ensure that new development has appropriate regard for to its surroundings in terms of residential amenity. It has been demonstrated that the proposed development does so.

Quality of residential accommodation

All the new flats meet the London Plan space standards, including storage space, and are provided with good quality private amenity space in excess of London plan standards.

Flat 6 is single aspect. It is south facing and the daylight sunlight assessment demonstrates that it receives good amounts of light. The small size of the flat mean that they will be able to be more easily ventilated. This accords with the guidance of the Mayor’s Housing SPG which says:

“Good single aspect one and two bedroom homes are possible where limited numbers of rooms are required, the frontage is generous, the plan is shallow, the orientation and or outlook is favourable, and care is taken to mitigate the potential for overheating without the need for mechanical cooling” (para 2.3.40).

One flat has been provided to be wheelchair accessible and meets Building Regulations M4(3).

Traffic & Transport

The site has a PTAL of 4 (good). The provision of five car parking spaces amounts to a ratio of 0.56 spaces per flat. In the context of the town centre location and good level of accessibility to public transport this is considered to be adequate provision. The Electric Quarter development (providing a greater proportion of family sized accommodation) was granted planning permission with provision of car parking at a ratio of 0.58.

London Plan policy 6.13 sets out maximum residential parking standards, and sets out that all development in areas of 'good' public transport accessibility should aim for significantly less than 1 space per unit, and residential units of 1-2 bedroom should also be provided with less than 1 space per unit.

The draft London Plan sets out that Outer London with a PTAL of 4 should provide up to 0.5 spaces per dwelling.

The proposal also provides secure storage for 16 bicycles. Two visitors spaces for the residential flats are also provided in the courtyard. Two visitors spaces are provided for the pub adjacent to the south of the site. This meets the requirements set out in Table 10.2 of the draft London Plan.

Servicing of the pub will continue as existing with deliveries made from the front service road. The new bin store is located at the rear of the pub as previously and collections will be made under the same arrangements as currently exist.

The residential bin store has refuse and recycling capacity of 2 x 1100L and 2 x 360L bins which exceeds Enfield's standards.

The Transport Statement concludes:

"The public transport provision, the proximity to local facilities, along with the secure and covered cycle parking within the site will encourage future residents, staff and visitors to use an alternative mode to the private car."

"Based on TRICS trip rates the proposed development is predicted to generate no vehicular movement in the peak hours. The number of vehicular movements associated with the proposed development will therefore have a negligible effect on the surrounding highway network."

"It is considered that there is adequate capacity on the footways fronting the site to accommodate pedestrian demands associated with the site."

"NPPF paragraph 109 states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' As demonstrated within this report the impacts are not severe."

"Overall, it is concluded that there is no highway or transportation reasons to object to the proposed development."

Sustainability and Energy

The development has been designed to have a 'Fabric First' approach.

This involves prioritising the thermal efficiency of the building envelope as much as possible, over adding lots of 'Sustainable Technology'. The aim of this is to reduce the need for lots of Energy in the first place. Where energy using products are required, e.g. lights, these will be highly energy efficient.

For example:

- Excellent U-Values (better than building regulations) through use of thick insulation in walls & roofs, Glazing specifications etc, thus reducing the heating requirements
- Improved air tightness, especially around the junctions of different building materials - to reduce air leakage and keep the warmth in, thus reducing the heating requirements
- Good levels of natural lighting – reducing dependency on artificial lighting, thus reducing energy requirements

The London Plan (and the draft London Plan) does not require minor development to meet specified energy use targets. Nonetheless, the measures set out above will ensure that the development meets Building Regulations Part L and beyond.

Policy DMD 49 says that

“All new development must achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability.

2All development will be required to include measures capable of mitigating and adapting to climate change to meet future needs having while regard to technical feasibility and economic viability”.

Policy DMD 50 requires minor residential development to meet Code Level 4 for Sustainable Homes. This standard is now defunct with Building Regulations Part L (as amended in 2016) forming the more up-to-date and relevant standard. The development will be built to meet those standards.

In accordance with DMD 58 the development will include features to limit water use to 105 litres per day per person.

We note that the Council's validation checklist of 2018 does not require a Sustainable Design & Construction Statement or Energy Statement for a minor residential development proposal.

SuDS

The existing site is entirely hard standing and so the proposed development will not increase surface water run-off. DMD61 requires that all development (other than major) include at least one 'at source' SuDS measure

that reduces rain water run-off. The soft landscaping around the ground floor will capture rain water and thereby reduce run-off.

Biodiversity

DMD79 and 81 require biodiversity improvements and landscaping that can provide biodiversity enhancements. The planting around the ground floor of the new residential building has the potential to provide this.

Prejudice to future development and prematurity

It has been suggested by the Council in its pre-application advice that the development of the pub car park could prejudice the future development of the Tesco car park.

Drawings have been submitted that show that development of the Tesco car park could be brought forward without unduly compromising the amenity of occupants of the pub car park development.

Notwithstanding this Tesco has no plans to develop its car park. It has not submitted any representations to the Council as part of the Local Plan review and no planning application has been submitted to the Council for the development of the Tesco car park.

The NPPF is clear that planning law requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Local planning authorities may give weight to relevant policies in emerging plans according to, among other things, the stage of preparation of an emerging plan (paragraphs 47 and 48).

Paragraph 49 of the NPPF says:

“However in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and

b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area”.

This application is, by definition, minor. It is for nine dwellings only. It is difficult to conceive that it is so substantial or its cumulative effect would be so significant that to grant permission would undermine the plan making process about a new development, especially as that ‘new’ development is nothing more than wishful thinking on the part of the Council without any form of support of the landowner.

It is noted that the Local Plan review is at its very earliest stages and the Council has no draft policies or site allocations. It is the opposite of advanced.

This application is, therefore, not premature.

Summary & Conclusion

The proposal provides good quality residential accommodation in an accessible town centre location whilst retaining and improving the existing pub.

The proposed new buildings respect and are subservient to the locally listed pub.

The new residential accommodation has been designed to meet the relevant space standards with private amenity space and defensible space outside the ground floor units. The majority of the flats are dual aspect. Single aspect flats are not north facing and are 1-bed dwellings with good access to light and good, non-mechanical ventilation. It is demonstrated that the new dwellings will not be unacceptably impacted upon by noise from the pub.

Five car parking spaces are proposed, a ratio of 0.56 which is in line with the draft London Plan for dwellings in Outer London with a PTAL of 4. Secure storage for 16 bicycles and two visitors spaces is provided in line with draft London Plan policies.

The development is classed as minor and there are no adopted planning policies that require it to meet any energy or sustainability standards. Nonetheless the development will utilise a fabric first approach with high quality insulation and low energy technologies to meet and surpass Building Regulations Part L (2016) standards.

It has been demonstrated the application is not premature in accordance with paragraph 49 of the NPPF.

The proposed development is therefore sustainable development and, in accordance with the guidance set out in the NPPF, should be granted planning permission.

Yours sincerely

Joe Haines