ASSESSMENT OF PROPOSED RESIDENTIAL DEVELOPMENT

SITE OF ELLERAY HALL, MIDDLE LANE, TEDDINGTON, TW11 0HG



FRONT ELEVATION (NORTH FACADE)



SIDE ELEVATION (EAST FACADE)



SIDE ELEVATION (WEST FACADE)

BAR SCALE

April 2021



1. INTRODUCTION

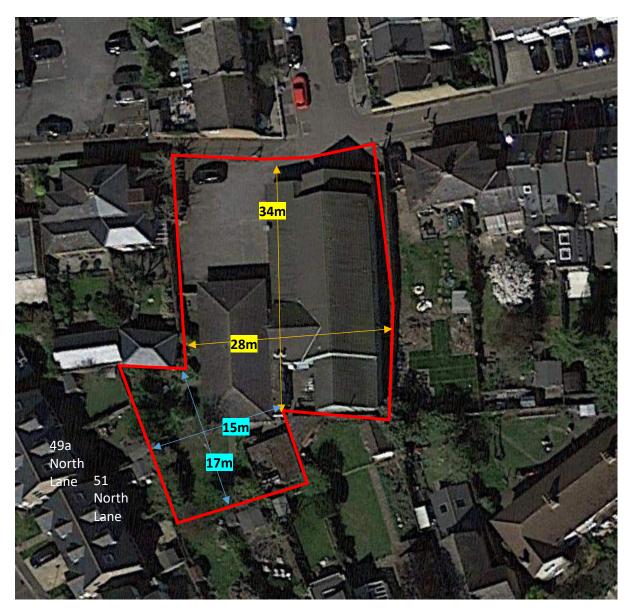
We were asked by local residents living close to the two sites owned by the London Borough of Richmond upon Thames that are subject to proposals by the Council, to assist them in connection with the Council's ongoing engagement exercise to provide objective assessments of the current proposals for:

- a community centre to replace the existing Elleray Hall on the site of the former Council depot and the North Lane (East) car park; and
- > a residential development of affordable housing on the site of Elleray Hall.

The assessment below responds to appropriate questions about various aspects of the development.

The residents want to emphasise that they support proposals for development of the right scale and type in the right location. They also support, in principle, initiatives taken by the Council to improve facilities for the community across the Borough.

2. THE SITE AND KEY DIMENSIONS



3. IMPORTANT NOTES

The Site is adjoined by 10 residential properties as follows:

Middle Lane (2): Nos, 15 and 21 North Lane (4): Nos.49, 49a. 51 and 53 Park Lane (4): Nos.22, 24, 26 and 28

The 'Local Plan' referred to is the London Borough of Richmond upon Thames Local Plan 2018.

4. ASSESSMENT

a. Do the flats cause any harm to the amenity of neighbours in respect of the following:

i. Overlooking / Loss of Privacy: In terms of the loss of existing privacy, the rear garden of No.15 Middle Lane would likely be the worst affected space in this respect, with the existing private garden proposed to be backed onto by 4 new gardens serving the ground floor flats.

Whilst the proposed windows on the eastern side of the building face away from No.15 Middle Lane itself, they will still look over its rear private garden and which will result in the potential loss of privacy caused by overlooking by the occupiers of 8 new flats, into what is at present a private and secluded garden space.

The windows on the eastern and southern side of the proposed building also face out towards Nos,16-28 Park Lane> Occupiers of these dwellings would see the worst overall affect in terms of loss of privacy arising specifically from potential overlooking.

- **ii. Overshadowing:** The height and orientation of the building in respect of the neighbouring dwellings will likely result in limited overshadowing and the creation of additional areas of shade in gardens to the extent of negatively affecting the majority of neighbouring residents in some form or another. The worst affected properties would likely be No.21 Middle Lane and No.26 Park Lane, which would be affected by greater shading.
- iii. Impact on Daylight and Sunlight: The proposed building is located to the west of the properties on Park Lane. There is, therefore, a possibility that the proposal will block the morning sun towards these dwellings. The impact will be particularly pronounced in respect of Nos.49 and 51 Park Lane.
- iv. Impact on Outlook / Overbearing: The existing building as a single storey community hall sits fairly discretely within the site. The proposed larger rear building will undoubtedly create a negative outlook from the rear of Nos.49 to 53 North Lane and Nos.28 -18a Park Lane.

These aspects identified above are contrary to Local Plan Policy LP 8 of the Local Plan: Amenity and Living Conditions, selected relevant text follows: All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:

- 1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;
- 2. ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height, massing or siting, including through creating a sense of enclosure;
- 3. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;
- 4. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.

Applicants are expected to have regard to the guidance set out within the Council's SPDs relating to design, including Village Planning Guidance, SPDs on extensions, infill and backland developments, housing mix and standards as well as residential development standards.

Under the heading 'Visual Intrusion, Privacy and Outlook' Paragraph 4.8.7 of the Local Plan states:

An overbearing, overpowering or over-dominant development can significantly reduce the quality of living conditions both inside and outside, in new as well as existing developments. [4.8.7]

The Local Plan continues by referring to the need for a distance of 20 metres as the minimum between habitable rooms within residential development and 13.5 metres where windows face a wall that that contains no windows or windows that are occluded.

Whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. The minimum distance guideline of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; where the established pattern of development in the area (layout and height) may favour lesser distances. The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres. Where the impact of a building is on another within the same development site, measures can also be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc. A Supporting Planning Statement should set out justification for a reduction in these distances. [4.8.8]

The aerial image map on page 1 illustrates the difficulty in achieving these distances on the site. These critical difficulties are most acute in respect of the relationship between the proposed building and Nos.49a and 51 North Lane.

The proximity of the proposed development to neighbours and its overbearing nature are illustrated by the **Images 1** to **7** below for properties on North Lane, Park Lane and Middle Lane (courtesy of residents).





Image 2 View from first floor bedroom North Lane



Image 3 View from North Lane first floor bedroom



Image 4: View from ground floor Park Lane property



Image 5: View from first floor Park Lane property



Image 6: View from ground floor Park Lane property

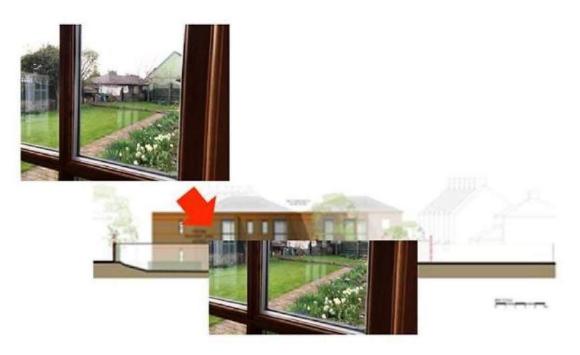


Image 7: View from first floor Park Lane property



Image 8 clearly shows the proximity of No.21 Middle Lane, its annex, which is inhabited by a son of the occupiers, and Elleray Hall...and the tightness of space.



Image 8

The occupier of No.15 Middle Lane has prepared the **Appendix** to this Assessment. This shows the impacts of all the first floor flat windows on his garden. It also shows that the architects have added more trees than presently exist. This is also true for properties on North Lane.

Impact on Trees

Profound concerns have been expressed by some residents about the potential impact of the development on trees. The quality and reliability of the Preliminary Arboricultural Assessment have also been called into question.

The potential impact of development on the site upon trees on gardens adjoining it should be assessed as soon as possible.

Any planning application would need to be supported by:

- > Tree Survey for Development with accompanying plan (in accordance with BSi 5837)
- Arboricultural Impact Assessment
- > Tree Constraints Plan
- > Tree Protection Plan

If issues have been identified, how could they be addressed?

The appropriate way to address the identified issues would be to reduce the footprint of the development so that it does not extend deep into the site, reduce the number of proposed units on it, and adopt a scheme of smaller buildings as opposed to a singular block.

This would help break up the extensive massing of the proposed dwellings which as presented will result in the overlooking, loss of sunlight and daylight and overbearing nature of the proposed building.

With the scheme as proposed, loss of privacy upon the neighbouring dwellings results from separate units at ground and first floor levels. A scheme of singular family housing units would reduce the effect of this and be more in keeping with the prevailing, long-established pattern of development.

b. Are there issues in respect of Secured by Design Principles?

The proposed building provides an additional frontage to Middle Lane, the information states that the proposed access path to the rear is gated.

The path towards the rear should ideally be lit. However, lightning along the pathway needs to be carefully considered and designed sensitively so as to avoid the potential negative light pollution implications towards No.21 Middle Lane and potentially No.49 North Lane.

As the existing building on the site is a public building with an open car park along the boundary with No.21 Middle Lane, the creation of a gated private residents' only space should reduce the risk of crime towards the neighbouring properties.

However, Local Plan Policy LP1, criterion 5 (see page 16 below) is very clear that **gated** developments will not be permitted.

The most fundamental consequence if the development is not gated is that it would open up the site up to non-residents, increasing the security risk to neighbours and the residents of the block.

In respect of the surveillance of the pedestrian access and path, the Elleray Hall Re-Provisioning team has advised:

Surveillance of internal boundaries should be improved from the current condition of communal garden and community centre being occupied mainly during the day. The residential building will have evening occupancy, so enhanced self-policing. The windows on the rear flank wall, closest to the boundary of 49a North Lane will be obscure glazed, for neighbour privacy. However, if the ground floor kitchen window was transparent then the west boundary and proposed communal garden would be further protected, this is something we can explore if welcomed.

We understand that the project architects have suggested that normal glass be used in the ground floor unit at the rear of the housing scheme to increase security. The adverse consequence of this for neighbours is that it would diminish their privacy. It is apparent that neither option is suitable: neighbours either lose privacy or have a security issue.

Do the flats:

c. comply with the nationally-described space standards?

All the proposed flats comply with the nationally described space standards, as summarised below.

Flats	Size of flats	Nationally described standard
Flats 1 and 2: 1 bedroom, 2 person, Wheelchair accessible	61 sq m	50 s qm
Flat 3 and 4: 2 Bedroom, 3 Person	61 sq m	61 sq m
Flats 5 to 12: 1 bedroom, 2 person,	50 sq m	50 sq m

d. comply in all material respects with Richmond's planning policy requirements, for example quality and quantity of private and communal amenity space, bin and bike storage?.

Relevant policy not explored elsewhere within this assessment is noted and assessed below.

Local Plan Policy LP35: Housing Mix and Standards (Selected relevant text)

A. Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site's specific location.

No family-sized units are provided. The site is located outside the designated Teddington Town Centre, and the prevailing character is that of family housing. The mix of 10 one bedroom units and 2 two bedroom units is, therefore, considered inappropriate.

C. All new housing development, including conversions, should provide adequate external space. Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions.

No balconies are provided for the upper floor units, including the larger 2 bedroom units. The requirements of this aspect of Policy are, therefore, not met.

D. Amenity space for all new dwellings, including conversions should be: d. of a sufficient size to meet the likely number of occupiers

The 2 bedroom units do not have amenity space provision of a sufficient size for the number of likely occupants.

Local Plan Policy LP39: Infill and Back Garden Development (selected relevant Text)

A. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:
4. Respect the local context;

The larger rear block is out of context with the prevailing character.

8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes;

It has been established at section [a] on pages 2-6 above that the development as proposed would have an adverse impact upon neighbours related to a number of factors.

9. Provide adequate servicing, recycling and refuse storage as well as cycle parking

2 bin and cycle storage units are provided, no detail is provided at this stage as to the number of bicycles and bins that could be provided within these units.

Although we would not expect details of specific facilities yet, it should be demonstrated that there is adequate space for what is required within an acceptable, accessible location or locations.

The plan proposes to position the rubbish bins from 16 households directly outside the fence to No.21 Middle Lane and the door to its living room area (1.3 metres between the garden door to No.21 and the fence with bins on the other side). This is unacceptable on several levels. The impact of rubbish produced by the residents cannot be passed onto the neighbour. Rather, the bin location should be integrated as part of the proposed development. Noise and smell produced by residents ought not to be passed onto others.

Local Plan Policy LP45: Parking Standards and Servicing (selected relevant text)

The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimizing the impact of car based travel. It will achieve this by;

1. Requiring new development to provide for car, cycle, 2 wheel and where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in appendix 3.

The proposal only provides a single disabled parking space, no provision is made for delivery vehicle parking, which for 12 flats will likely be considerable, and there is no evidence of any provision of electric vehicle charging points.

- 2. Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to;
 - a. The provision of disabled parking;
 b. Appropriate servicing arrangements; and
 c. Demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality;

Whilst the proposal is car free, the site has a PTAL of only 3, only a single disabled space and no provision for servicing / delivery vehicles. No evidence is provided about how the proposal will not contribute to existing on-street parking stress.

Local Plan Appendix 3 (Parking Standards) requires 1 space per unit for 1-2 bedroom residential development in PTAL 3 areas and 2 spaces per unit for 3 plus bedroom residential development.

Local Plan Paragraph 11.2.3 states:

Developers may only provide fewer parking spaces, including car free schemes, if they can demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity. In general it is expected that in PTAL areas of 0-3 the standards should be met.

Do the flats:

e. Provide satisfactory accommodation for future occupiers?

All ground floor 1 bedroom units benefit from private rear gardens. However, none of the first floor units including the two 2 bedroom units benefit from any private amenity space. It is assumed that no balconies are proposed on the upper level because they would conflict with the second criterion of Local Plan Policy LP8 reproduced on page 2 above.

These deficiencies alone suggest that if the present arrangement of flatted development within a single block were to be maintained, there should either be fewer units on a reduced upper storey or no upper storey at all, and which would not in itself represent the most efficient use of land and would be out-of-keeping with the long-established character and appearance of the area.

One would expect the larger units to have greater need of external amenity space than the one-bedroom units.

The internal amenity of future occupiers will be far from optimal. It is evident that occupiers of the flats would suffer from poor quality of light. This would lead to undesirable levels of reliance on electric light rather than natural light which would be more readily available with a scheme designed to take proper account of this issue.

Image 9 is a shade diagram representing the situation in a few years' time (consistent with the 5m/6m tree shown in the architects' CGI image). Local residents recall the project architect saying tree planting was one way he had addressed the privacy issues. However, this results in the already boxed-in small gardens being shaded in addition to the shade from the buildings themselves.



Image 9

f. Provide satisfactorily for emergency and refuse vehicles and the emergency services?

The 2 bin stores are located discreetly and easily accessible both from the road and from the flats and allow for easy collection.

Fire trucks will need to park on Middle Lane. The standard hose used by the London Fire Brigade has a length of 23 metres, which is shorter than the length of the site which is estimated as being about 40 metres deep. Provision of a fire hydrant within the site is, therefore, likely in order to achieve an appropriate level of safety from fire for occupiers of the proposed and neighbouring properties.

Other Matters

g. Bats

It is understood that bats might be present on the site. A planning application must be supported by the results of a survey and details of any mitigation strategy that might be required.

All bat species are listed under Annex IV (and certain species also under Annex II) of the European Union's Council Directive 92/43/EEC (The Habitats Directive), and are given UK protected status by Schedule 2 of the Conservation of Habitats and Species Regulations 2017. Bats and their roosts also receive protection from disturbance from by the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000). This protection extends to both the species and roost sites. It is an offence to kill, injure, capture, possess or otherwise disturb bats. Bat roosts are protected at all times of the year (making it an offence to damage, destroy or obstruct access to bat roosts), regardless of whether bats are present at the time.

Surveys and assessments will need to be undertaken in order to assess the building and individual trees for potential bat roost sites before the potential value of the site for roosting bats can be assessed. The habitat area is small and urban and fragmented from high value sites and so if roosting sites are present then the species are likely to be widespread. The site is likely to provide a sheltered foraging site for what may be relatively small numbers of bats. The site is likely to be of Site or Local Value for bats but further surveys would give greater confidence in this initial assessment.

Survey and assessments need to comply with Chartered Institute of Ecology & Environmental Management (CIEEM), Natural England and Bat Conservation Trust survey and mitigation guidelines and conform to CIEEM's assessment and reporting standards.

Amongst material published by The Bat Conservation Trust¹ is the following:

Local Planning Authorities' legal duty to protected species

An important judgment was handed down by His Honour Judge Waksman QC sitting as a judge of the High Court at the start of June 2009 in the case of R (on the application of Simon Woolley) v Cheshire East Borough Council. The judgment clarifies for the first time **the legal duty of a Local Planning Authority ("LPA") when determining a planning application for a**

¹ We express our thanks to the BAT Conservation Trust and acknowledge its authorship

development which may have an impact on European Protected Species ("EPS"), such as bats, great crested newts, dormice or otters. The species protection provisions of the Habitats Directive, as implemented by the Conservation (Natural Habitats Etc.) Regulations 1994, contain three "derogation tests" which must be applied by Natural England ("NE") when deciding whether to grant a licence² to a person carrying out an activity which would harm an EPS. For development activities this licence is normally obtained after planning permission has been obtained.

The three tests are that:

- 1. the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
- 2. there must be no satisfactory alternative; and
- 3. favourable conservation status of the species must be maintained.

This court judgment makes it clear that, notwithstanding the licensing regime, **the LPA must** also address its mind to these three tests when deciding whether to grant planning permission for a development which could harm an EPS. A LPA failing to do so would be in breach of Regulation 3(4) of the 1994 Regulations which requires all public bodies to have regard to the requirements of the Habitats Directive in the exercise of their functions.

In a judgment delivered on 25th March 2011, the Court of Appeal decided that **demolition** constitutes a project under the terms of the **EU Environmental Impact Assessment Directive**. This automatically meant that the directive in UK law which exempts the demolition of certain building types from requiring planning permission became unlawful.

h. External Finishes and Design / Character/Appearance

> Building fronting Middle Lane

The front elevation along Middle Lane is designed in a characterful manner so as to appear as two detached properties in a similar style as Nos.13 and 15 Middle Lane with a stock brick façade with red brick banding and a pitched roof.

No window details are shown on the drawings, but these should ideally be in a traditional style, utilsing styling similar to neighbouring dwellings on Middle Lane.

The two traditional elements are linked with a two storey glazed element, providing access to the two 2 bedroom flats on the first floor, which provides a lightweight solution that maintains the impression of two separate buildings.

Rear Building

The design of the larger rear building is more problematic. Whilst the use of stock brick with the red banding continues the response to the neighbouring buildings, the flat roof and modern-style slit windows results have little relationship with the surrounding character. The overall resulting appearance would be of an overbearing and dominant façade, more

² An European Protected Species Licence

resemblant to an institutional building such as a doctors' surgery or school than residential development.

The consequence in planning policy terms is that the proposal would be contrary to Local Plan Policy LP1: Local Character and Design Quality (selected relevant text);

A. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

To ensure development respects, contributes to and enhances the local environment and character the following will be considered when assessing the proposals;

1. Compatibility with local character including the relationship to existing townscape, development patterns;

- 3. Layout, siting and access
- 4. Space between buildings

i. Sustainable Design and Construction

The Consultation document provides the following information;

The sustainability of the affordable residential dwellings follows Zero Carbon principles, with super-insulated fabric, photovoltaic panels, reduced rainwater run-off and reduced water consumption, plus an 'extensive' biodiverse green roof. Heating and hot water will be generated by air source heat pumps

The Green roof is supported by Local Plan Policy LP 17: Green Roofs (Relevant text only)

'Green / Brown roofs should be incorporated into new major development with a roof plate area of 100 sqm or more'

The remaining aspects are supported via Local Plan Policies LP20: Climate Change Adaption and LP22: Sustainable Design and Construction.

The precise nature of the measures will need to be set out and assessed as part of a planning application submission, but the overall direction of travel at this stage is what would be expected.

j. Flood Risk and Sustainable Drainage

The site is not located in a location considered to be at risk of flooding according to the Environment Agency Flood Map.

k. Viability

Residents have concerns about the viability of the whole project, believing that the proceeds expected by the Council for the sale of the affordable housing site (estimated at 0.125 ha) value is exaggerated and based on false assumptions and unsupported financial assessment. However, as the Council does not share the relevant information, placing it all under part II, residents can comment no further.

It is in the public interest that the viability assessment be made public as this is a development proposed by a local authority that is like all local authorities answerable to those that live in the Borough and contribute significantly to its activities through their votes and their Council Tax and Business Rates.

5. CONCLUSIONS

The following policy of the Richmond upon Thames Local Plan 2018 ('the Local Plan') provides an appropriate framework with which to assess the proposed housing scheme. Text emphasised bold is considered to be particularly relevant in respect of the proposals for the Elleray Hall site.

Policy LP 1: Local Character and Design Quality

A. The Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

- 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
- 2. sustainable design and construction, including adaptability, subject to aesthetic considerations;
- 3. layout, siting and access, including making best use of land;
- 4. **space between buildings, relationship of heights to widths** and relationship to the public realm, heritage assets and natural features;
- 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
- 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.

It is considered that the proposals fail to satisfy the requirements of Local Plan Policy LP 1 in numerous respects.

Our overall impression is that the scheme is simply trying to cram too much into the site, and with the number of neighbouring homes that surround the site, and the character of the surrounding area, a lower density scheme that moves away from a large singular block would be more appropriate. The singular large block is too large for the site and would be quite oppressive. Its appearance is more akin to an institutional building, such as a doctors' surgery or school.

The scheme fails to provide an adequate mix of units, adequate private amenity provision and adequate car parking provision for a PTAL 3 location. These issues cannot be overcome without reducing the number of units.

We are well aware of how diligent the London Borough of Richmond upon Thames as a local planning authority is in all matters connected with development management. This scheme would be given short shrift at pre-application engagement stage if it were promoted by private developers, as proposed by the Council for land it owns.

We understand the need for affordable housing and support its provision in appropriate locations. However, this should not be justification for overdevelopment. The Council needs to apply the same scrutiny to itself as it does others.

Suggestion

We are aware of an outline planning permission for 3 two-storey houses with integral gardens that was granted in 1969. It is assumed that they occupied the space between Nos.15 and 21 Middle Lane. Whilst no further details of this scheme are available, we consider in the light of our findings that a building arrangement along these lines would be much more appropriate to the site of Elleray Hall.

This would help overcome the issues identified within this assessment, namely:

- Reduce the mass and bulk of the proposed building and the negative implications of this for neighbouring residents.
- > Enable adequate provision of car parking

It would be possible for flats to be provided within a building that looks like a house. Alternatively, 4 family houses arranged as two semi-detached buildings together with another building with 3 smaller flats (2 bedroom / wheelchair accessible on the ground floor plus 2 one bedroom flats above) This would enable the provision of 7 units, with a better mix of units whilst reducing the overall impact of the scheme upon the neighbouring residents to an acceptable level. This could ultimately provide for up to 7 units through the following broad arrangement:

- Block 1: 2 x 3 bedroom semi-detached houses with dedicated garden
- Block 2: 2 x 3 bedroom semi-detached houses with dedicated gardens
- Block 3: 1 x 2 bedroom / wheelchair accessible flats on ground floor with 2 x
 - 1 bedroom flats on the first floor

This potential arrangement could be configured in various ways. Two illustrative layouts are shown below. We put these suggestions forward for investigation and testing. These reflect our view that two storeys are appropriate to a reduced footprint on the front part of the site, as this is consistent with the prevailing urban grain.



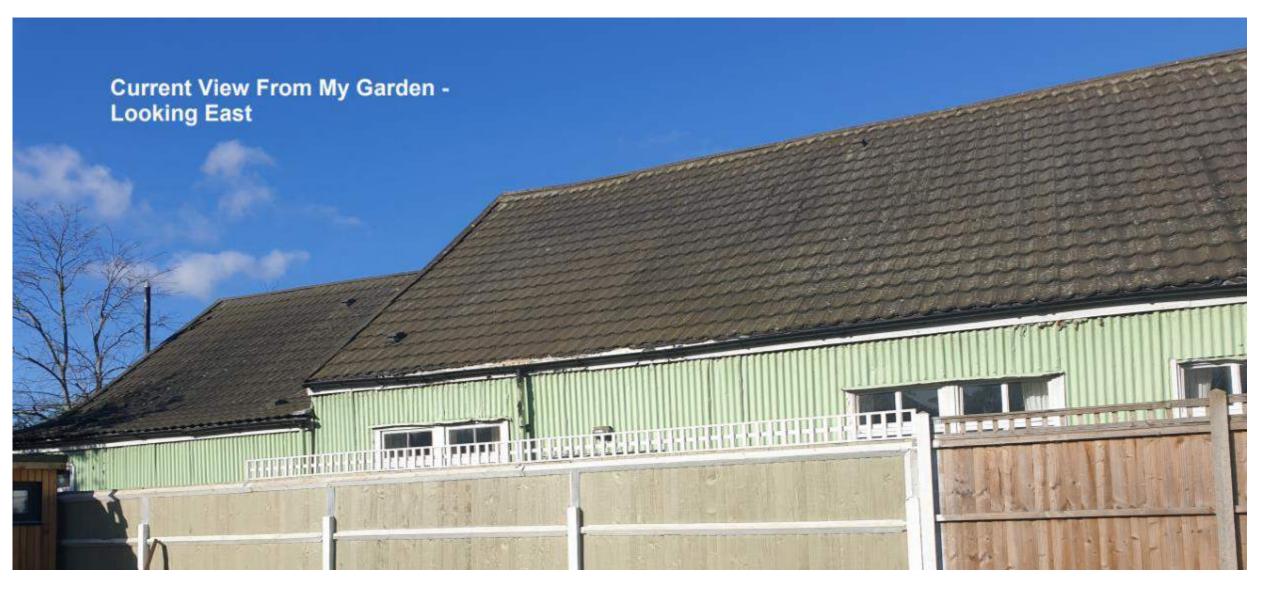
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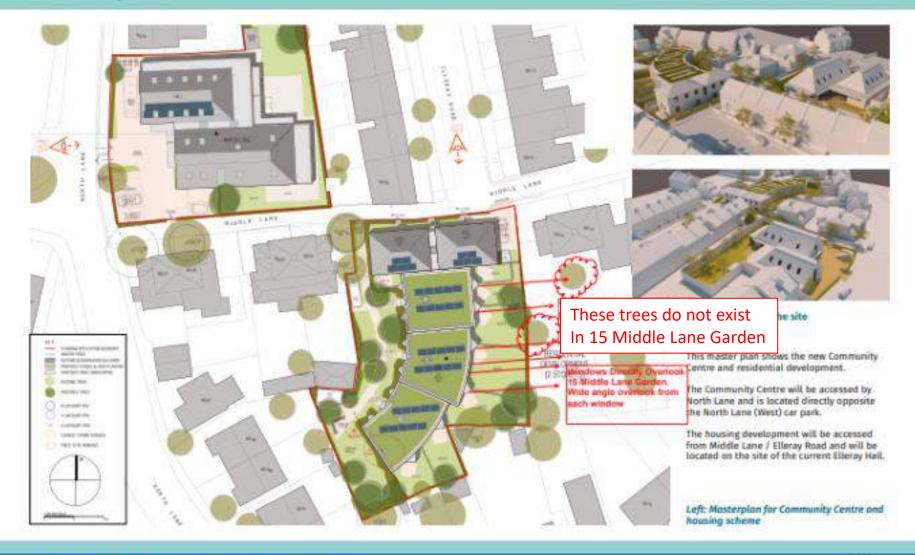
SIDE ELEVATION (EAST FACADE)







Master plan









New housing - site plan

- 12-1beds
- 2-2 beds
- + 2 1 bed wheelchair units at the ground floor
- All units enjoy the benefit of some private or communal gardens space
- Car free development
- · One disability parking space
- · flike storage
- Bin storage







