

J.A.P. Architects

Planning Application

Proposed Residential Building of Multiple Occupancy (HMO), Providing 6No. Residents' Rooms

at

Les Ager Drive, Haverhill

DESIGN, ACCESS & PLANNING STATEMENT

February 2023

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1.0 The Site

1.1 Site surveys and analysis information is provided at drawing 21040-01.

1.2 The application site is located off a private road, known as Les Ager Drive, close to the centre of Haverhill. It is adjacent to, but not within, Haverhill's Conservation Area. The site is not located within a flood zone and there are no trees on the site. To the south west of the site are a row of trees which, while not the subject of individual TPO's, are considered to have amenity value, providing softening and screening of views into the conservation area. A separate arboricultural report is provided with this application.

1.3 The application site measures circa 0.02ha, with principal dimensions of 26.7m long and 8.2m wide. It is located to the rear of a large, 2.5 storey property known as No.5 Wrattling Road. Formerly a large single dwelling, No.5 Wrattling Road now functions as HMO accommodation and is owned by the applicant.



Figure 1: Extract of Site Location Plan



Figure 2: North east flank elevation of No.5 Wrattling Road



Figure 3: Looking south east along Les Ager Drive. Fence to application site on the right

- 1.4 The site's north east boundary (to Les Ager Drive) comprises a 6ft tall close boarded fence; to the south west is a small hedge (see Fig. 3).
- 1.5 A former garage is located at the north west end of the site. This small building is currently used by the applicant for storage. The south east boundary is coincident with the rear wall of No.5 Wrattling Road.
- 1.6 The site is virtually level and is largely comprised of grass, with a narrow path running along its north east side, though the adjacent access track has a continual gradient of 1:18 rising south east to north west.
- 1.7 The site is surrounded on all sides by residential houses and gardens.



Figure 4: The site, looking north west towards former garage building.

2.0 Pre-Application Consultation

2.1 A Pre-Application package was submitted to West Suffolk Council in August 2022, following which there was a meeting with officers on 16th September 2022.

2.2 The Pre-Application proposal sought to explore the potential for the erection of a 2.5 storey residential building providing 6No. resident's rooms.

2.3 Some concerns were raised by officers in respect of building scale and amended plans were submitted (see Fig. 6) by the applicant on 12th October 2022, ahead of the officer's written Pre-App response, which was received in late October.

2.4 In their written response the principle of this type of residential development was accepted and officers acknowledged the amendments. However, they maintained a number of concerns in respect of building scale.

2.5 Accordingly, we have further amended the proposal to address officers' concerns and a point-by-point response to the officers' comments provided in the section below.



Figure 5: Principal elevation of initial Pre-Application proposal



Figure 6: Amended Pre-App Elevations

3.0 The Proposal

3.1 The proposal seeks to create a single new residential building — a residence of multiple occupancy, providing 6No. resident’s rooms, a communal living area and associated storage etc.

3.2 The main building element will have a 2 storey scale, with one of the proposed rooms located in the roof volume, which will have a traditional pitched roof with full hips at each end. At the north end, the building will step down to a 1.5 storey scale, again incorporating a hipped roof.

3.3 At 4.6m high, the principal eaves line will run along the top of standard-height, first floor windows, at a similar height to neighbouring residential properties, effecting the sense of a traditional 2-storey building when seen from the adjacent track.

3.4 The roof pitch rises to a maximum ridge height of 8.55m, which is commensurate with a large dwelling, similar in bulk to neighbouring buildings at Wratting Road.

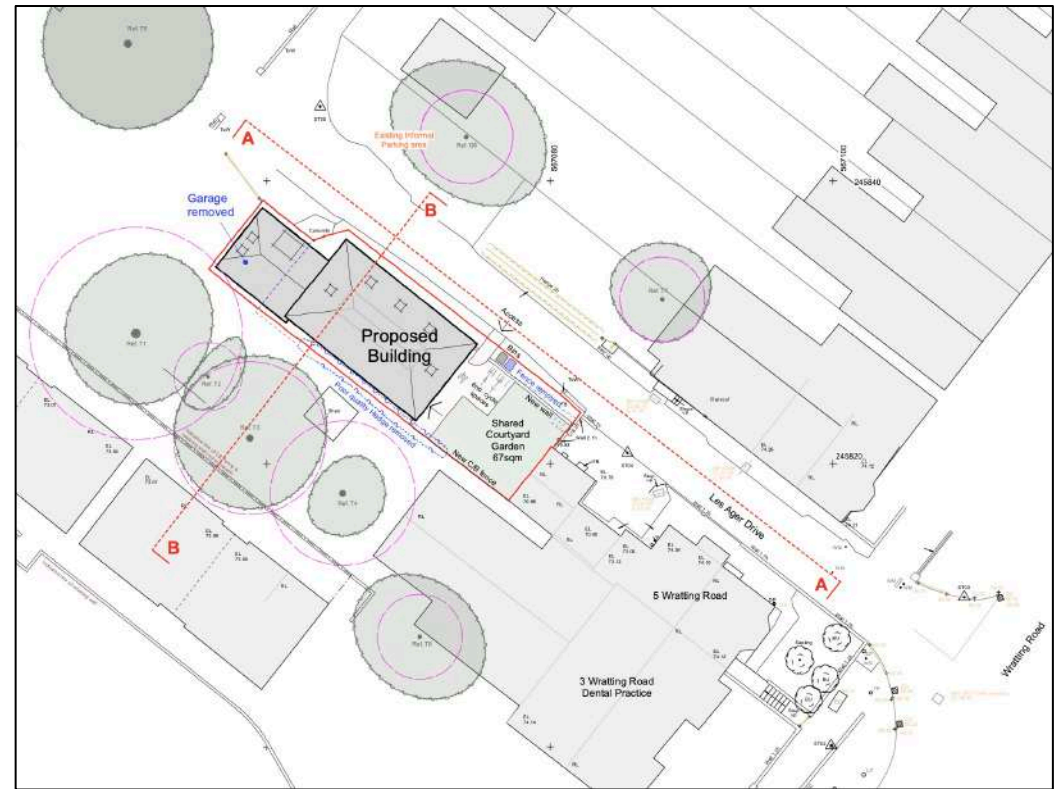


Figure 7: Extract of proposed Site Plan

3.5 As can be seen from the proposed site plan, the proposed building footprint — containing 6no. self contained studios — has a similar footprint and plot-ratio to the modern, semi-detached dwellings to the south west. The footprint is also similar to the property at No.5 Wratting Road but somewhat smaller than No.3 Wratting Road and the nearby pair of semi-detached dwellings at Nos. 7 and 9 Wratting Road.

3.6 An access gate will lead directly from Les Ager Drive (a long-established, shared-surface access) into a secure, shared courtyard space for use by residents. The main entrance to the building is taken from this courtyard into a horizontal and vertical circulation zone running along the south west flank of the building.

3.7 A large communal space is provided at the ground floor, at the north end, along with two residents’ rooms that will face out onto Les Ager Drive. 3 residential rooms are provided on the first floor and one room is provided at second floor, within the roof volume.

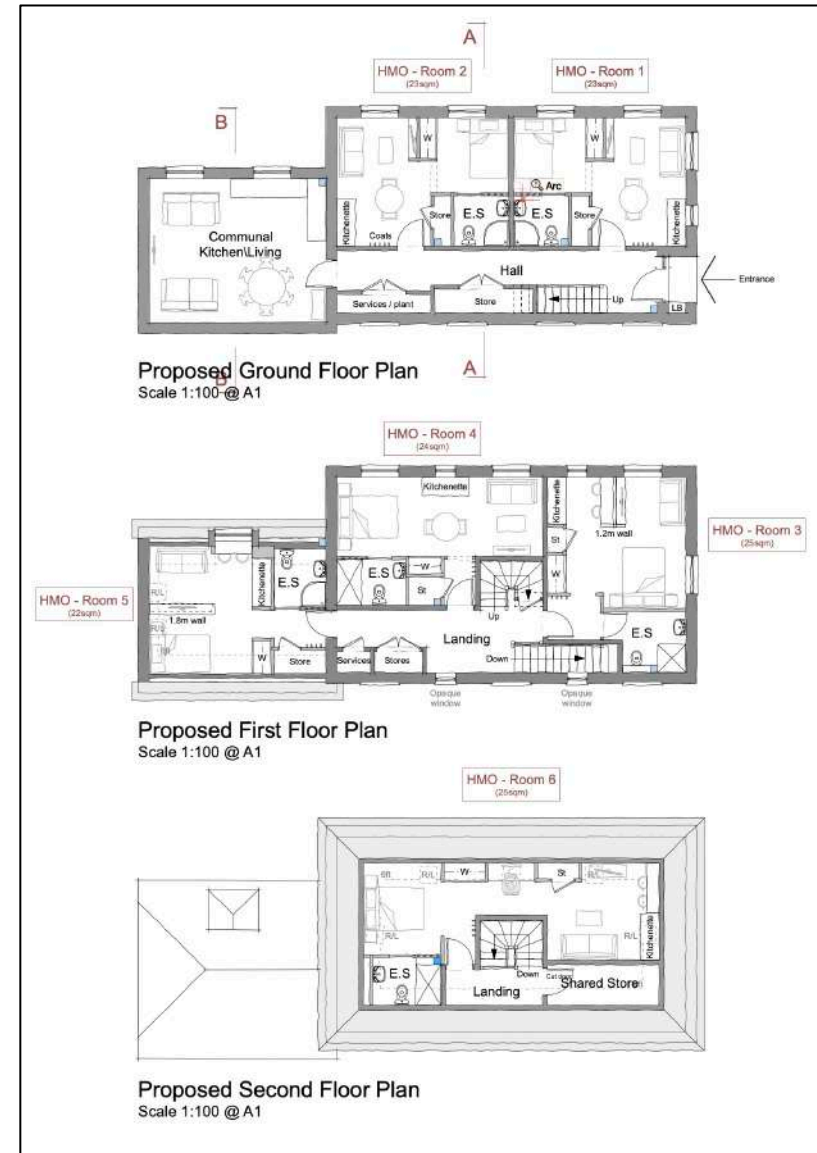


Figure 8: 1 Extract of proposed floor plans

- 3.8 Other aspects of the proposal are described below, where we have reproduced the officer's Pre-Application remarks, with our response and clarification, provided in red.

The proposal fills the majority of the plot

The plot ratio is commensurate with the use and is similar to the modern scheme of 8no. flats to the south west at Cangle Road (see Fig. 10).

and given the width and narrow nature of the plot it will prove a challenge to provide a building of that size without it appearing too prominent on the streetscene in a way that is forward of the build line and very close to the roadside along what is a narrow access road.

The proposed building line (the north east flank wall) is set further away from the edge of the access track than No7 Wrattling road, where the sense of enclosure is significantly greater given the proximity of No.5 Wrattling Road.

The proposed building is also set opposite a zone where the hardstanding surface widens (to circa 11m) to take in a parking area. Therefore, we contend that the proposal will appear less prominent than the neighbouring buildings (see Fig. 11 below).



Figure 9: Area of widened hardstanding in front of the proposed building

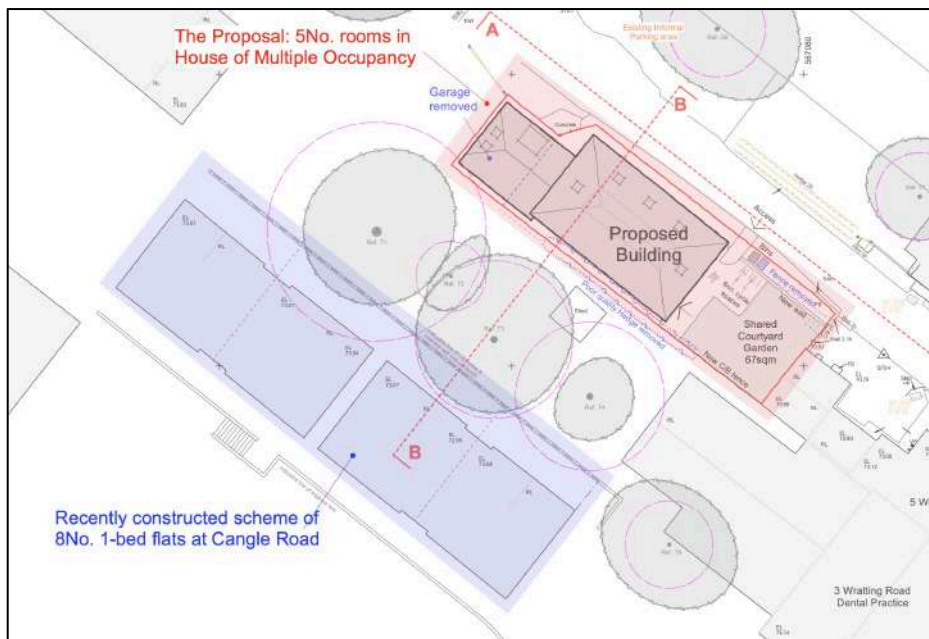


Figure 10: Density/Plot ratio comparison with recent development at Cangle

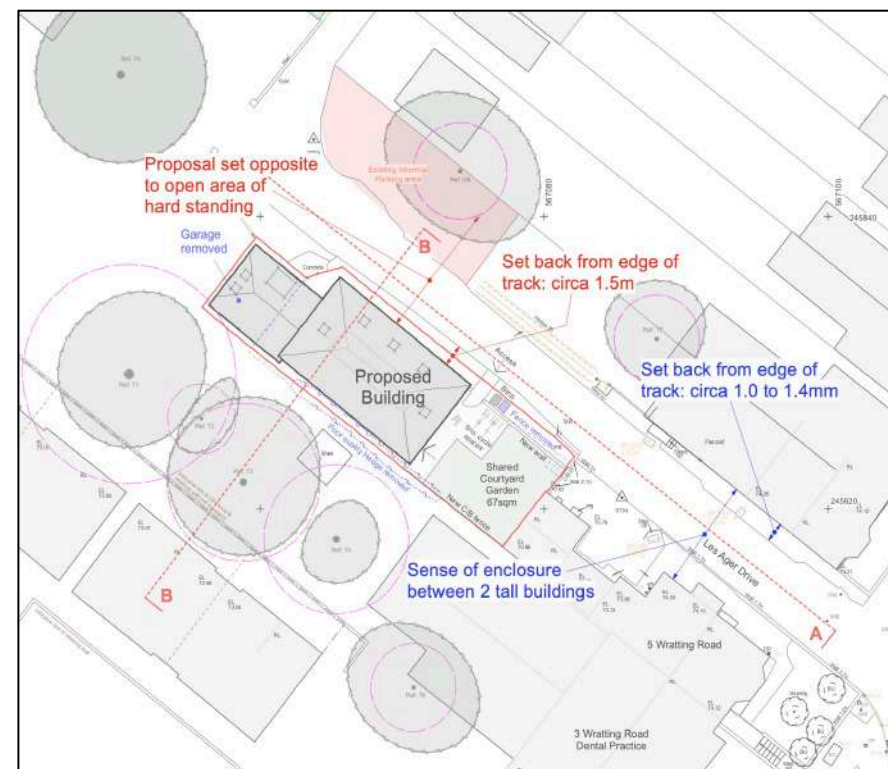


Figure 11: Annotated extract of proposed site plan

The initial design demonstrated no fenestration to the rear elevation and given the proximity to all boundaries and to the buildings to the south, it brings concerns that it could appear hostile and oppressive and become unneighbourly as an outlook when viewed from the flats and garden space to the southwest.

Following discussions, amended sketch proposal drawings have been submitted with a particular focus on the massing of the southwest façade to try to reduce the tall, blank elevation. The amended design incorporated an animated façade with detailing and the break from brick to render reducing the vertical emphasis. It was also advised that the ground floor wall is obscured by an existing hedge, and which is to be retained with other areas being obscured by recessed panels in addition to two first floor windows.

The zone to the south west (an unused open area to the rear of a long-established dental practice) is screened from the conservation area by mature trees, all of which are to remain. However, we have endeavoured to ‘quietly animate’ the proposed south west façade through low-key architectural detailing. The hedge, which is owned by the applicant, is in poor condition and is now to be removed (refer to arboricultural report). In itself, removing the hedge does not require planning consent and we have also included to provide low level planting along the south west boundary (see Fig.12).

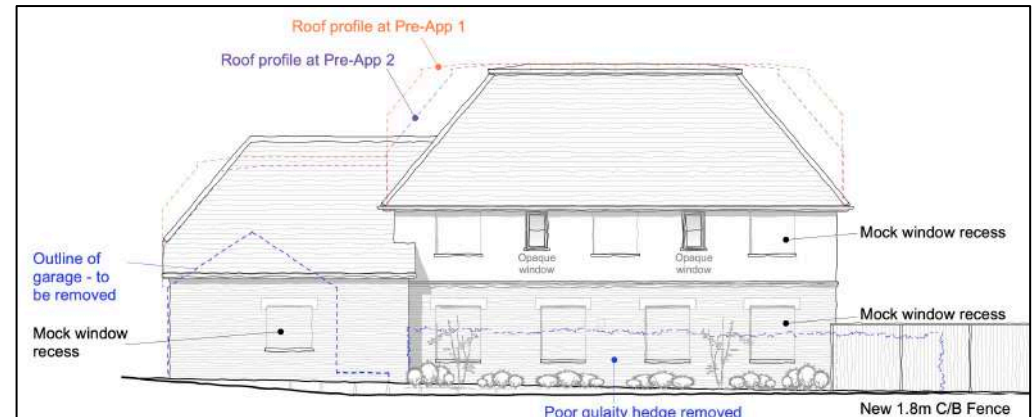


Figure 12: Proposed rear/south west elevation

It was denoted in the cross section drawing 02 that the overall height of the proposal is the same as the neighbouring building at Cangle Road. The revised sketches also demonstrated an extended depth and coverage of the hipped roof at each end that draws focus inwards and gives the illusion of increased space between proposal and adjacent roof pitches.

This aspect of the design (increased space between roofs) has now been further reinforced by the creation of a full hip detail at each end of the principal building element. Also, the perception of vertical mass is now reduced with the omission of all dormer windows shown previously, at the Pre-App submission.

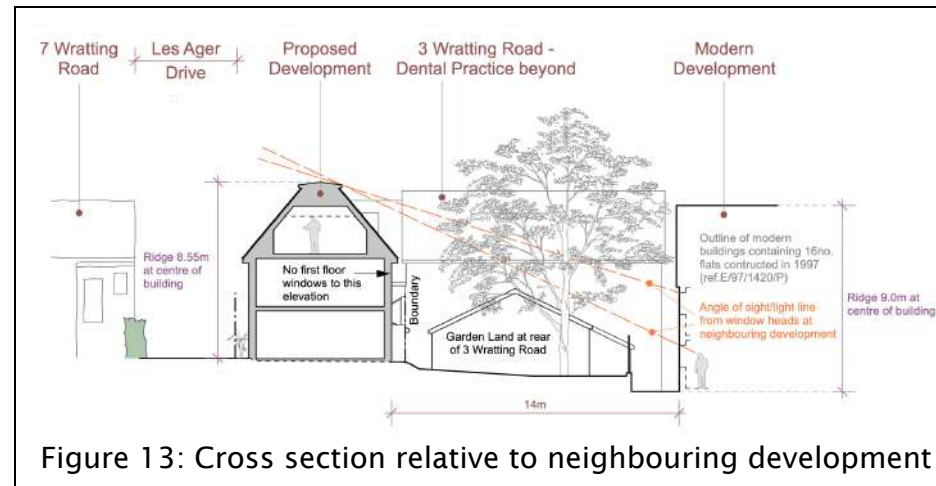


Figure 13: Cross section relative to neighbouring development

The building is, in and of itself, attractively designed, with a pleasant form and using a range of appropriate materials. These are therefore factors that weigh, moderately, in favour of development. However, the site is positioned in a location where a diminishing scale might reasonably be expected beyond the principal buildings facing Cangle Junction.

We do not agree with this assertion, particularly in this instance where the local topography rises significantly from Wrattling Road. Relatively, the proposed building is less tall than the buildings at Wrattling Road. On the cross-section the proposed ridge line appears to be at a similar height, but this is due to the proposal being founded on higher ground. A similar effect is observed at the dwelling to the north west, beyond where the track turns 90°. It is also seen at the modern development of houses located at the north end of Les Ager Drive. The same effect — of rising ridge lines, but similar building heights — can also be seen at the neighbouring Dove House Road. It is quite usual to see the ridge lines of buildings rising with the relative topography.



Figure 14: Massing diagram looking from Les Ager Drive

However, your street scene indicates that the building will in fact be taller than those along the principal frontage.

This is not correct: The proposed building is not 'taller'; it is located on higher ground.

It will also be positioned materially closer to the road frontage than others, and modestly forward of the building line taken along the flank of No. 5.

As stated above, the proposed building is positioned opposite an area where the hardstanding surface widens. Also, it is not 'materially closer to the road frontage' than No.7 Wratting Road, where the dominance is multiplied by the relative position of No.5 Wratting Road.

Whilst individually these factors might not be considered fatal, but cumulatively, there is concern that the development will appear cramped and contrived in this context, leading to some harm to the character and appearance of the area. This would be contrary to Policies DM2 and DM22.

We hope to have addressed these concerns through the roof amendments (omitting dormers and reducing the gable wall height through a full-perimeter hipped roof) and the foregoing points of clarification.

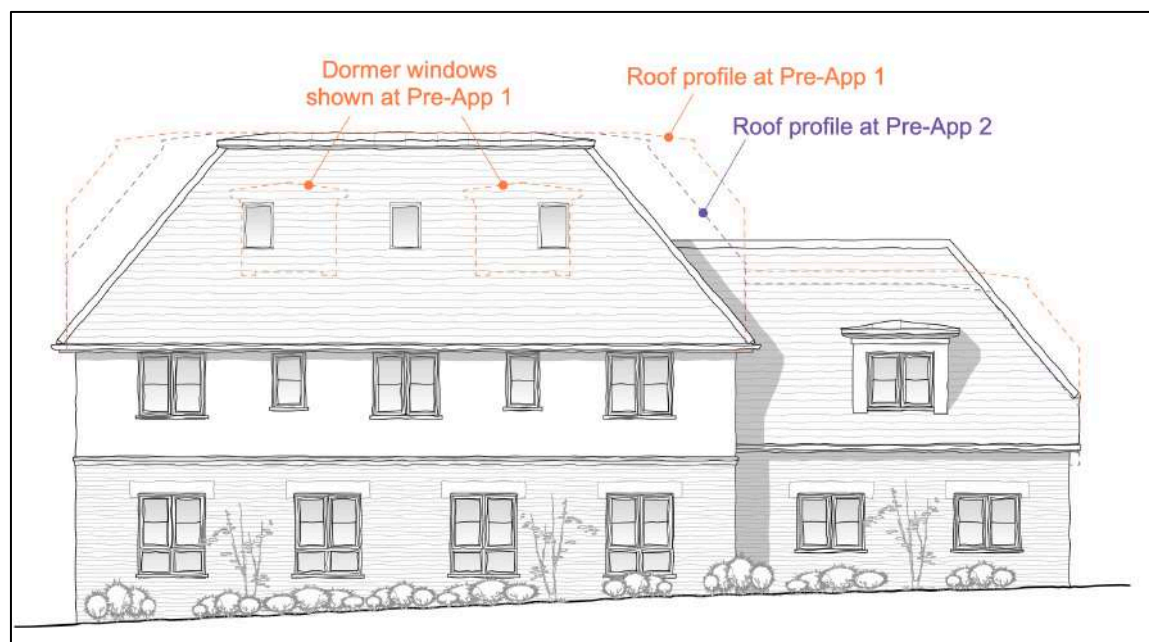


Figure 15: Proposed north east elevation

In relation to the effects upon amenity, the rear of the building is positioned approximately 13.5 metres from the rear elevation of the flatted accommodation to the south west. Given the scale of this building, the close proximity to other properties, the position close to the boundary, and given the notable fall in levels to the off site flats it will increase the perception of bulk and height. Consequently, it does all contribute to the raising of strong concern about the suitability of this. The roof form is noted, but the physical proximity is considered challenging, and that, on balance, the impacts upon amenity are considered significant, proving contrary to the provisions of Policy DM2.

The neighbouring flatted development at Cangle Road has ground floor windows and (very) small rear gardens that are entirely screened by a tall fence and existing trees (see sight lines on cross section). For a town-centre location, the juxtaposition of building forms and relative heights (following local topography) is not unusual. There will be no harm to light reaching the neighbouring dwellings (and sunlight is wholly unaffected, given the relative position) and there will be no harm to amenity caused by overlooking. The building mass of the proposed roof has been further reduced since the latest Pre-App submission (see cross section above).

Whilst the lack of parking is respected, a consultation would be necessary with the Local Highway Authority and at a minimum secure cycle storage would be required in addition to adequate bin storage. No such detail appears to be shown on the drawings provided, and limited space exists for such. Taken together, these are further factors which support an argument that the development is asking too much of such a limited and physically constrained site.

The detailed proposals include dedicated cycle and bin storage, as well as a shared courtyard garden that is well-lit, secure and generous by comparison to the open space associated with the HMO housing at No.5 Wrattling Road — refer also to Part 5 below.

The development could also impact on the aforementioned trees and as such that would need to be explored and investigated through the submission of a tree survey and report to accompany any such application.

An arboricultural report is provided separately with this application.

The development might lead to both direct impacts arising from construction, as well as possible indirect future impacts arising from further pressure to remove trees that are otherwise then starting to impact on the building, for example through leaf drop or through general ‘nuisance’. This would make it increasingly difficult for the Authority to resist future works to reduce or remove these trees, which noting their important location screening views out of the Conservation Area, would lead to further harm to the character and appearance of the area.

The proposal does not include any habitable windows facing the trees and the trees do not relate to the proposed amenity space. The scope for them becoming a ‘nuisance’ to living conditions’ is therefore considered negligible. Any nuisance factor is far more likely to be associated with the modern flatted development to the south west. The trees are on separate, privately owned land and it is considered quite implausible for a case to be made that they will impact future living conditions within the proposed building.

Whilst the amended design therefore goes some modest way to alleviate concerns, there is still a high degree of concern held in relation to this proposal. Whilst the benefits of the scheme are noted and acknowledged, and while some weight is therefore rightly offered in support, this would, in my view, not be sufficient to outweigh the concerns set out above. The site is physically constrained, and it is difficult to envisage how the site might be capable of being developed without fundamental alterations to the proposal.

Site constraints are quite usual for small parcels of unused land in built-up areas of the town. However, such constraints are considered to be no more onerous than the high-density housing at Cangle Road and other areas of neighbouring development. We have sought to reduce the sense of vertical massing through significant changes to the proposed roof design and we have provided clarification on other points relating to the proposal’s position relative to the track and neighbouring development.

4.0 **Trees, Ecology & Landscaping**

- 4.1 An arboricultural report is provided separately with this application.
- 4.2 The existing site is not considered to provide appropriate habitat for protected species — it is comprised of a small area of lawn, a hardstanding terrace, some domestic shrubs and a poor quality hedge (refer to Preliminary Ecology Appraisal).

5.0 **Access, Parking & Refuse**

- 5.1 Pedestrian access to the site will remain as existing, with clearly legible entrances from Les Ager Drive. The existing access tracks already serves emergency and refuse vehicles etc.
- 5.2 The applicant has a long-established vehicular right of way over the adjacent access track from Wrattling Road.
- 5.3 This proposal is seeking a car-free development in line with the existing HMO accommodation at No.5 Wrattling Road. The site is located in a very sustainable position in the town, in terms of there being a very short walking distance to all manner of amenities and facilities, including shops, schools, places of leisure and entertainment; bus stops, taxis and places of employment; restaurants, cafes and public open spaces. Providing even one on-site parking space would necessitate such a dramatic reduction in accommodation as to make any new development wholly non-viable. We believe the planning balance falls strongly in favour of a car-free development given the highly sustainable location and the proposal for delivering small and accessible HMO rooms. We contend that the proposal meets the Suffolk Guidance for Parking 2019 criteria for car-free developments as the site is considered very sustainable in transport terms.
- 5.4 Notwithstanding the car-free design, the proposal fully incorporates safe and secure areas for parking cycles.
- 5.5 The provision for refuse storage and collection has been designed to meet the appropriate standards.

6.0 Planning Policy

6.1 Below we set out the relevant Planning policies and how the proposal responds to the policy requirements:

Policy DM1 Presumption in Favour of Sustainable Development

The proposal is to be sited in a highly sustainable location, close to the centre of Haverhill.

Policy DM2 Creating Places Development Principles and Local Distinctiveness

The proposed building has been carefully designed and will create an attractive addition to Les Ager Drive.

Policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance

The existing site is considered to have very low biodiversity value.

Policy DM11 Protected Species

The existing site is not considered appropriate for protected species.

Policy DM13 Landscape Features

At present, the site comprises an enclosed area of unused, former garden land. There are no significant landscape features that will be lost and all trees on neighbouring land will be unaffected.

Policy DM17 Conservation Areas

The site is outside of, but adjacent to, a conservation area. There will be no negative impacts arising from the proposal, as the site is screened from the conservation area by existing trees and a modern flatted development at Cangle Road.

Policy DM22 Residential Design

The design is of a good quality — at Pre-App stage, officers stated: *the building is, in and of itself, attractively designed, with a pleasant form and using a range of appropriate materials.*

Policy DM23 Special Housing Needs

The proposed HMO rooms are designed to meet appropriate standards and all will have an outward facing aspect to the public realm, while also benefitting from a secure and private external amenity area.

Policy DM46 Parking Standards

The proposal meets *Suffolk Guidance for Parking 2019* criteria for car-free developments and the site is considered very sustainable in transport terms.

Core Strategy Policy CS3 - Design and Local Distinctiveness

The design is attractive and modest by comparison to local development. The design is visually fitting with the location and wider environs.

7.0 Summary

7.1 As part of the Pre-Application process, the applicant (Ellis Estates) liaised with Anglia Care Trust (ACT), who manage the HMO rooms in the applicant's neighbouring property at No.5 Wratting Road. In their letter to the planning authority, dated 9th August 2022, ACT stated the following:

ACT provide much needed residential accommodation for people that have experienced varying challenges in their life.

5 Wratting Road provides ideal accommodation for people looking to get back into their own accommodation. It is one of very few properties that has the communal benefits of shared space in a HMO but also has self-contained kitchen and bathroom facilities working as studios. This enables residents to have moral support from their co-residents while also having privacy and their own place when required.

ACT works with many landlords and Ellis Estates is one of our most responsive and proactive landlords responding to repairs and improvements.

ACT is very supportive of the proposed new build on the land to the rear of 5 Wratting Road that will have purpose built self-contained apartments. There is much demand for this specific type of self-contained studio.

7.2 The applicant is clearly a well respected landlord and there is clearly a need for good quality, safe and sustainably located accommodation of the type set out in this proposal. From a management perspective, the proposal will be ideally located, having mutual benefits with No.5 Wratting Road.

7.3 The application site is vacant and provides a rare opportunity to create housing for vulnerable people in a location that is close to numerous facilities and support networks etc.

7.4 We have taken care to design a building that is attractive, well-appointed and safe. It fits with the urban pattern of the locality and we believe it will enhance Les Ager Drive. We commend these proposals to the council.

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For and on behalf of J.A.P Architects

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