

Registration Date: 4<sup>th</sup> March 2016  
Officer: Neetal Rajput  
Applic. No: P/08040/018  
Ward: Chalvey  
Applic type: Major  
13 week date: 3<sup>rd</sup> June 2016

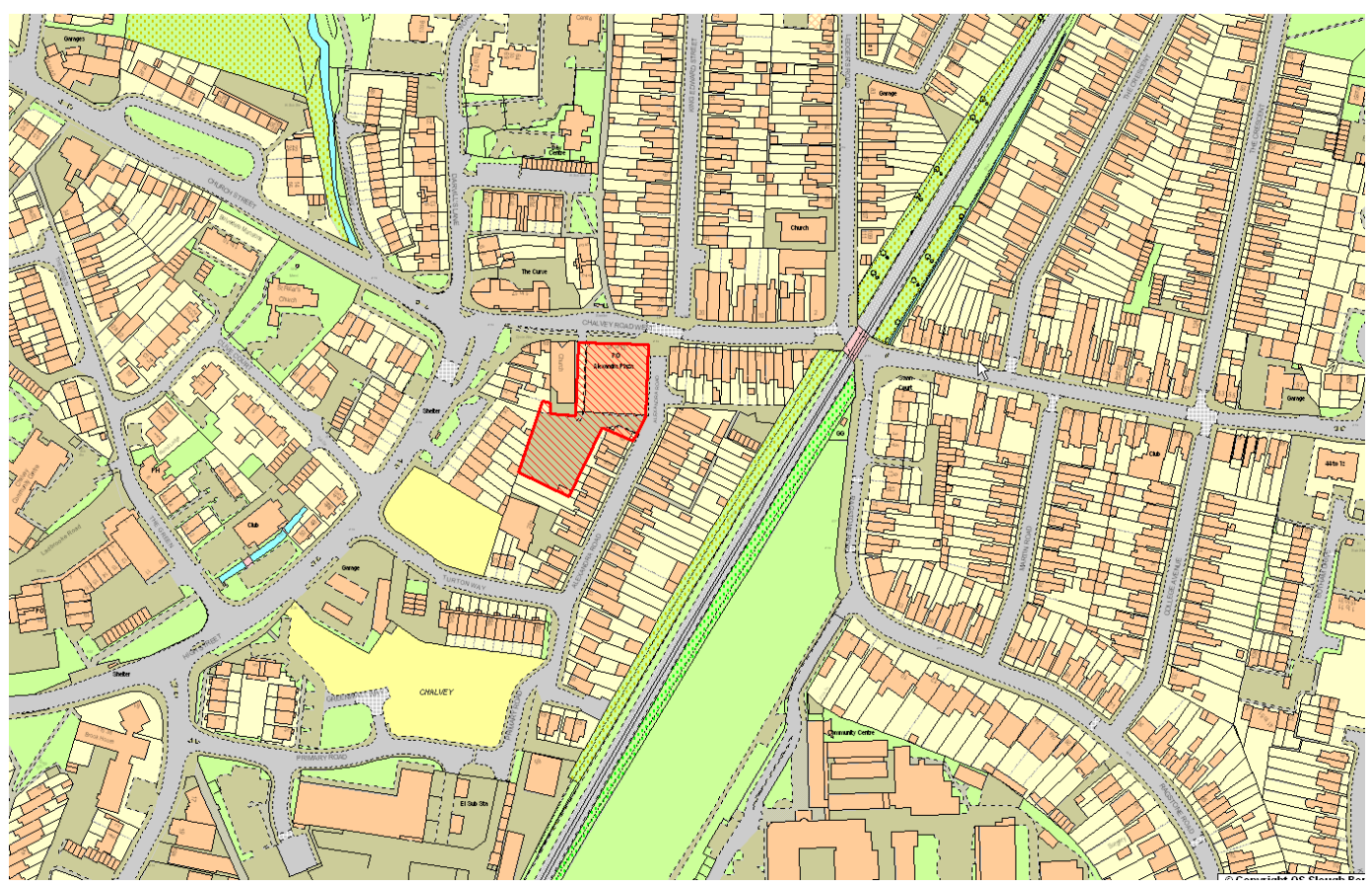
Applicant: A. A & Sons Ltd

Agent: Christopher Wickham, Christopher Wickham Associates, 35 High Street, Highgate, London, N6 5JT

Location: Alexandra Plaza, 33 Chalvey Road West, Slough, SL1 2NJ

Proposal: Demolition of 4 Alexandra Road (as previously approved) construction of courtyard infill extension at first floor level, construction of roof extension and (previously approved) staircase extension, to provide reconfigured offices and retail storage at first floor level, and 32 no self contained flats at first, second and third floor levels, with associated elevational changes, and realigned access to Alexandra Road (as previously approved).

**Recommendation:** Refusal



## 1.0 SUMMARY OF RECOMMENDATION

- 1.1 Having considered the relevant policies set out below, the representations received from consultees and all other relevant material considerations, it is recommended that the application be refused, for the reasons set out in this report.
- 1.2 This application has been referred to the Planning Committee for consideration as the application is for a Major Development.

### **PART A: BACKGROUND**

#### 2.0 **Proposal**

- 2.1 This is full planning application for the demolition of 4 Alexandra Road (as previously approved), the construction of a courtyard infill extension at first floor level, construction of roof extension and (previously approved) staircase extension, to provide reconfigured offices and retail storage at first floor level, and 32 no self contained flats at first, second and third floor levels, with associated elevational changes and realigned access to Alexandra Road (as previously approved).
- 2.2 The schedule of accommodation is given as follows:

<b>Floor</b>	<b>No. of residential Units</b>	<b>Unit Mix</b>
Ground		Retail units as exiting
First	11	11x 1 bed units, offices, staff toilets, and cycle stores, central retail storage 300m <sup>2</sup>
Second	14	4no studios, 5x1 bed and 5no 2 bed
Third	7	2x1bed and 5x 2 bed
<b>Total</b>	<b>32no</b>	<b>4no. x studio, 18no. x 1 bed, 10 no. x 2 bed,</b>

- 2.3 Cycle parking has been integrated into the blocks. Cycle parking is being provided on the basis of 1 cycle space per dwelling unit, plus 1 for visitors. Refuse space is within the car parking area. Car parking is through designated units within the existing supermarket car park. With the exception of three of the proposed units on the 3<sup>rd</sup> floor, none of the proposed apartments have external space or balconies. There is no amenity space on the site.
- 2.4 In summary the application proposal is to :
- Retain the existing retail use on the ground floor
  - Conversion of the 1<sup>st</sup> floor to provide retail storage in a new extension covering the current central courtyard, to replace the existing storage located on the northern and eastern sides of the 1<sup>st</sup> floor. The creation of 11no flats through the reduction of the existing office areas, and change of use of the existing storage areas
  - The development of the currently incomplete and undeveloped vacant 2<sup>nd</sup> floor, to provide 14no apartments

- The construction of an additional floor, set back from Chalvey Rd and the Alexandra Rd elevations to provide 7no self contained flats.
- This is an overall residential mix of 4no studio flats, 18no 1 bed flats, and 10no 2 bed flats
- The construction of a stairway extension on the south elevation of the building as previously approved
- The demolition of 4no Alexandra Rd to facilitate the re-alignment of the vehicular access onto Alexandra Rd, as previously approved
- Associated alterations to the buildings main external and inward facing elevations
- Minor changes to the layout of the existing car park to provide refuse storage, and to reserve 12no parking spaces for unallocated use by residents of the proposed development.

2.5 The application is accompanied by the following documents:

- Design and access statement
- Daylight and sunlight report
- Location plan 14/08/01
- Existing floor plans /elevations
- Proposed ground floor plans
- Proposed first floor plans 14/08/41
- Proposed 2nd floor plan 14/08/42
- Proposed 3rd floor plan 14/08/43
- Proposed elevations drg 14/08/44
- Proposed courtyard elevation drg 14/08/45
- Proposed site plan drg 14/08/50
- Visual impact assessment drg 14/08/51
- Photomontage drg 14/08/42

### 3.0 **Application Site**

3.1 The application site lies to the SW of Slough Town centre, on the south side of Chalvey Road west, at the junction with Alexandra Rd. The site falls within the Chalvey High St Neighbourhood centre, and is currently occupied by a three storey building occupied by retail on the ground floor, with the offices of the supermarket on the first floor, along with storage, and the upper floors unfinished and vacant. The building has a square footprint, and encloses an internal courtyard above the roof of the retail area of the ground floor. At the existing roof level is a plant room, accessible by ladder.

3.2 The surrounding area is predominately residential (predominately 2no storey terraced houses) in character, however in this part of Chalvey Rd West, there is also a range of local retail, service and community uses. A church adjoins the western boundary of Alexandra Plaza. Along with the terrace housing there is also some taller flatted development.

### 4.0 **Relevant Site History**

4.1 P/08040/000 ERECTION OF A FOUR STOREY GUEST HOUSE COMPRISING 34

BEDROOMS AND 17 NO GROUND FLOOR PARKING SPACES

Refused 25-Jul-1989

P/08040/001 ERECTION OF A SUPERMARKET AND 9 NO. RETAIL SHOPS WITH A GUEST HOUSE ON THE FIRST AND SECOND FLOORS CONTAINING ANCILLARY FACILITIES INCLUDING 2 NO. STAFF FLAT 30 NO. BEDROOMS AND OFFICES ON THE CHALVEY ROAD WEST/ALEXANDRA ROAD JUNCTION ERECTION OF 10 NO. RESIDENTIAL UNITS ON THE ALEXANDRA ROAD FRONTAGE WITH CAR PARKING AND SERVICING ON THE LAND AT THE REAR (REVISED PLANS RECEIVED 13.08.89)

Approved with Conditions 07-Jun-1991

P/08040/002 ERECTION OF SUPERMARKET & SPLIT LEVEL CAR PARK WITH OFFICES ON THE FIRST FLOOR & GUEST HOUSE ON THE SECOND FLOOR TO BE USED AS AN EXTENSION TO THE DEVELOPMENT ALLOWED ON PERMISSION REF P8040/1.

Deemed Refusal 07-Sep-1991

P/08040/003 DEMOLITION OF EXISTING BUILDING AND ERECTION OF THREE STOREY BUILDING TO PROVIDE SUPERMARKET OFFICES AND GUEST HOUSE AS EXTENSION TO DEVELOPMENT APPROVED AT 33-41 CHALVEY ROAD WEST.

Deemed Refusal 30-Apr-1992

P/08040/004 THE CONSOLIDATION OF PLANNING APPLICATION P/08040/001, AND DOE APPEAL DECISION REF.NO. T/APP/V0320/A/92/204598/P7, DATED 22ND OCTOBER 1992, WITH MINOR ADJUSTMENTS TO INTERNAL ALTERATIONS, CHANGES TO FENESTRATION AND INFILL ADJUSTMENT TO SOUTH ELEVATION, TOGETHER WITH THE RELAXATION OF CONDITION 12 OF PLANNING PERMISSION P/08040/001

Approved with Conditions; Informatives 27-Jun-1995

P/08040/006 CONTINUED USE FOR A2 SOLICITORS OFFICE

Approved Unconditional 30-May-1996

P/08040/007 REMOVAL OF CONDITION NO 5 OF PLANNING PERMISSION P/08040/004 TO ALLOW RIGHT TURN MOVEMENTS FROM

CHALVEY ROAD WEST INTO SITE

Refused 27-Jun-1996

P/08040/008 RELAXATION OF CONDITION 12 OF PLANNING PERMISSION  
P/8040/4 TO EXTEND HOURS OF OPENING

Approved with Conditions 01-Jul-1996

P/08040/009 RELAXATION OF CONDITION 7 OF PLANNING PERMISSION  
P/8040/04 TO RETAIN EXISTING SURFACE CAR PARK

Approved with Conditions; Informatives 27-Jun-1996

P/08040/010 RELAXATION OF CONDITION TO ALLOW INTERIM TURNING  
PROPOSAL TO SERVE GROUND FLOOR RETAIL UNITS

Refused 21-Jan-1998

P/08040/014 ALTERATIONS TO EXISTING HIGHWAY TO PROVIDE RIGHT  
TURN LANE, TO ALLOW NON-COMPLIANCE WITH CONDITION 5  
OF PLANNING PERMISSION P/08040/004 AMENDED PLANS  
12/04/2000)

Approved with Conditions 20-Sep-2002

F/08040/017 PRIOR APPROVAL FOR CHANGE OF USE FROM CLASS B1(A)  
OFFICES TO CLASS C3 RESIDENTIAL (18 NO. FLATS)

Prior Approval Not Required 02-May-2014

#### 4.2 Pre-application Advice

Prior to submission of the application, the Applicant sought pre-application advice from the Local Planning Authority. This was provided by letter on 21/4/15

#### 5.0 **Neighbour Notification**

4-10 Alexandra Rd  
10a Alexandra Rd  
12-26 Alexandra Rd  
28a Alexandra Rd  
15-31 High St Chalvey  
1-7 High St Chalvey

49,51-53 and 53a Chalvey rd West  
47 Chalvey Rd West  
1-31 Chalvey Rd West  
Flats 1-15 The Curve  
26 Chalvey Rd West  
2-5 The Fields  
8-22 Chalvey Rd West  
76-86 King Edward Street

- 5.1 A petition of 115 signatures has been received, objecting to the development, The addresses listed on this petition are mainly Turton Way, Alexandra Rd, King Edward St, Carmarthen Rd, Montem Lane which surround the application site. The petition states *“This is an excessive development in an already congested area .It already has serious issues with parking, traffic congestion, anti-social behaviour and pollution. These problems have a major impact on the residents quality of life- The very reason we supported the one way system in the area .Any addition development here will add to the existing problems and totally destroy the quality of local residents lives .We therefore request that the council addresses existing issues before allowing any further development in the area “*

A further 34no additional individual objections have been received.  
A summary of the concerns listed in relation to the application is:

- Heavy traffic in the area /highly congested / impact on road safety
- Lack of adequate evacuation plan/fire escape
- Substantial anti-social behaviour in the locality
- Crime, Drugs and violence
- Over-crowding
- Extreme Lack of parking
- Late night disturbance/violence/late night disturbance
- Lack of local school places/ long waiting list
- Noise
- The height and bulk of the building
- Overshadowing /loss of privacy/overlooking directly into rooms/gardens
- Air pollution
- Deteriorating quality of life in the locality
- No green spaces for people here
- Reduction of quality of life for residents

## 6.0 Consultation

- 6.1 In accordance with Article 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, one site notice was displayed at the site on 5<sup>th</sup> April 2016. The application was advertised in the 8<sup>th</sup> April 2016 edition of The Slough Express.

## 6.2 Transport and Highways Date – 16/5/2016

This application is for a major development comprising the demolition of 4

Alexandra Road (as previously approved), construction of courtyard infill extension at first floor level, construction of roof extension and (previously approved) staircase extension, to provide re-configured offices and retail storage at first floor level, and 32no. self-contained flats at first, second and third floor levels, with associated elevational changes, and re-aligned access to Alexandra Road (as previously approved). The site is situated in a busy shopping area.

A Design and Access Statement has been provided.

Under application **F/08040/017**, prior approval has already been granted for change of use from class B1 (A) offices to class C3 Residential, and for 18 flats. However I understand from the planning case officer that this permission has now expired. The case officer has reviewed the existing development and found that if the permitted development scheme was submitted again it would not be granted consent as the change of use is from storage to residential, which would not be covered by the PD rights. Therefore the proposed application should be considered on the basis of 32 new flats.

### Trip Generation

A trip generation analysis has been conducted to assess the likely number of vehicle and person trips generated by the proposed development.

Daily People Trips

32 flats		32 flats
AM trips 0800-0900	21	12
PM trips 1700-1800	24	13
Daily Trips	224	123

If permitted estimate the development has the potential to generate in the region of 123 additional daily vehicle trips on the network and a total 224 people trips. The increase in vehicle trips will have an impact on the network as this site is located in a congested part of Slough and therefore some mitigation for the increase in trips would be appropriate.

### **Access**

#### Vehicle Access

There is vehicle access to the site from two locations – inbound from Chalvey Road West through the arch and then ingress and egress from the Alexandra Road access. Alexandra Road is accessed from High Street Chalvey via Turton Way. The route through the arch provides access for the shopper traffic from Chalvey Road West, if the shopping centre was no longer in existence or if it was to be significantly reduced in scale then I would encourage the developer to close this route off. If the car park is to be used at night, by the future residents, then I would encourage the developer to gate/shutter off this traffic route (at both ends) at night time to reduce anti-social behaviour.

There have a number of objections to the proposal on the grounds of access and it

is my understanding that local residents would prefer to see the existing road closure at the northern end of Alexandra Road re-opened such that access to the development could be taken from the north, via Chalvey Road West. This could be a worthy solution as it would remove the majority of the development traffic from Alexandra Road (south of the site) and Turton Way, which are predominately residential. Alexandra Road could then become a one-way road southbound. However, the northern part of the road has been closed for a long time and one can see utility covers clearly where the carriageway would be re-opened. The BT covers and boxes below would most likely need to be relocated at great cost and the zebra crossing also relocated. The cost of utility diversions could, based on costs of other schemes, run into hundreds of thousands of pounds; the relocation of the zebra crossing would cost circa £30,000-£50,000 and the CCTV camera would also require relocation. Therefore it is considered unreasonable to require the developer undertake these works.

The developer proposes to improve the Alexandra Road access to the site by demolishing 4 Alexandra Road in response to Highways comments relating to a previous planning consent. The demolition of No. 4 improves vehicle visibility, but the visibility splays have not been correctly drawn. It is requested that there are some minor changes to the design of the access such that improved visibility to the south can be achieved. This will include a build-out to the kerb in front of no. 6 which will enable the junction give-way line to be brought forward slightly which will help to improve visibility. This will in turn help to improve the alignment of the pedestrian route and associated dropped crossings across the junction. The kerb of the footway is dropped for a large section along Alexandra Road to the north of the site and I am not clear why this is the case. The lowered kerb makes pedestrians more vulnerable to vehicular traffic and therefore I would expect the kerb to be raised to full height along the length of Alexandra Road frontage of the site.

The demolition of No. 4 also enables a 1.5m footway to be provided along the southern boundary of the access road. The path will need to extend further into the site so it connects with the kerbed area adjacent where the bin store as otherwise, pedestrians could walk into the path of an oncoming vehicle departing the car park as they walk around towards the rear of No.6 Alexandra Avenue.

#### Pedestrian

Pedestrian access to the flats is from both Chalvey Road West and from Alexandra Road. The proposed access from Chalvey Road West is not acceptable as shown on the drawings as the door opens out onto the vehicle access route. This doorway must be relocated so that it opens out around the corner, in the sloping section of the area shaded in blue, away from the access road.

From Alexandra Road, the pedestrian routes have been improved with a widened footway along the south-side of the building of 2m wide and 1.5m wide footway along the southern boundary of the site. As discussed above some further improvements are required to the design of the access junction and location of crossing points and it may be necessary for the applicant a small section of land in vicinity of the junction to ensure a suitable pedestrian route is achieved north-south across the junction.



## **Car Parking**

The drawings show that there are 45 existing car parking spaces in the car park to the rear of the adjacent shopping arcade and the applicant proposes to maintain 44 spaces in the car park, a loss of 1 space. However the dimensions of the car park spaces are not 2.4m x 4.8m as some spaces are considerably smaller in length and the aisle widths should be 6m, but many of them are not and therefore one cannot accept that the car park can hold 44 vehicles. I would estimate that there are a maximum of circa 30 spaces in the car park. The applicant will need to provide a revised drawing showing aisle widths at 6m and parking spaces at 2.4m x 4.8m together with any disabled spaces at the appropriate dimensions. If the applicant is unwilling to update the drawing then the application should be refused on reasons of poor layout.

The drawing will also need to take account of the adjoining premises (5-7 Chalvey Road West) i.e. those in the north west corner of the site that have accesses where they load and unload and park that has the impact of the reducing the amount of space available for car parking.

Under the Slough Local Plan 2004, taking the main part of the development as pertaining to class C3 (Residential), there is a nil requirement for parking in shopping areas. 12 car parking spaces will be reserved for residents, as unallocated spaces within the car park. These will be marked and private enforcement arrangements will be in place. Whilst in Policy terms this is acceptable, there is a risk there will be a significant amount of overspill parking into the surrounding roads as residents of these new flats will need parking that cannot be met by the 12 spaces provided. Therefore the applicant should fund the introduction of a residents parking scheme in surrounding roads at a cost of £15,000 and any associated changes to on-street parking as required by the proposed scheme. Residents of this development would be ineligible to apply for parking permits in any existing or future residents parking scheme in the locality. The contribution will be spent on:

- consulting with residents living on roads on the north and south side of Chalvey Road West;
- full costs of making changes to traffic regulation orders; and
- costs of implementing signs and lines.

Now that it is apparent that there is no basis for the existing prior approval for flats then it is appropriate to re-consider the transport impact of this development, particularly on car parking. I would suggest that the applicant funds a car club for the residents of this development, which would then provide them with an alternative to travel by car. The car club should be located on-street, so that residents of Chalvey can also benefit from the car club and this would help make it more sustainable in the medium to long term. A contribution of £25,000 would be appropriate towards the cost of a car club and on-street bay, together with providing residents of the development free membership of the car club for 3 years.

The applicant should also fund the implementation of 3 electric vehicle charging bays in accordance with the standards set out in the IAQM guidance – 1 space for every 10 flats. Therefore 2 charging bays should be provided within the development, with the final bay provided on-street in relation to the car club bay.

### **Cycle Parking**

In accordance with the Local Developers Guide, a minimum of 1 no. secure cycle parking space per unit is required for residents. In the Design and Access statement there is a commitment to provide secure cycle storage within the existing building. The plans show storage units for 6 bikes on the first floor (between units 22 and 23), and a further 10 bikes on the second floor (between unit 9 and the offices), totalling 16 spaces. This can only work if the lifts are sufficiently large to accommodate bikes and I am not convinced that they are large enough. Whilst it is welcomed that bikes are proposed to be located within a secure area of the development, there is a risk with this type of the provision that it becomes difficult to use these facilities and therefore they do not get used or worse still the facility never gets installed in the first place. At store at ground level within the building would be a better option. I would request the applicant reconsiders bike storage provision.

### **Refuse and recycling**

There is an existing area for bin storage for commercial waste, with dimensions of 9m x 2m, within the existing car park area, to the rear of the main building. The applicant proposes to create a separate, enclosed, residential bin store, which can accommodate 5 bins and is acceptable. The bin store is located 22m from the edge of the highway, but the existing head in Alexandra Road should allow space to turn a refuse vehicle. This would exceed the maximum 12m reversing distance, but it is considered acceptable as an exception given the constraints of the site. The drawings will need to be amended to show details of the commercial loading area.

### **S106/S278 Agreement**

The applicant will need to enter into a section 106 agreement with Slough Borough Council, this s106 agreement will obligate the developer to enter into a section 278 agreement for the satisfactory implementation of the works identified in the highways schedule and for the collection of the contributions schedule.

The highways schedule includes:

- Temporary access point (as necessary);
- Enlargement of the existing bell mouth junction;
- Reinstatement of redundant access point (raise kerbline) along length of the Alexandra Road frontage to standard footway construction;
- Installation of street lighting modifications (as necessary);
- Drainage connections;
- Dedication as highway maintainable at the public expense, free of charge, of sight line areas (as necessary);
- Construct a build-out at the access junction with Alexandra Road to enable the provision of the 2.4m x 43m visibility splays and 2.4m x 2.4m pedestrian visibility splays;
- Dedication as highway maintainable at the public expense, free of charge, any land required to complete a safe crossing point of the site access;

Ideally the applicant should prepare a s278 Adoption Layout (Slough Borough Council Drawing Number 8/27/\*\*P1) to show the works required. This plan should be appended to the s106 and correspond to the Highway Works Schedule.

The transport schedule:

- £15,000 residents parking contribution and implementation of traffic orders; (prior to commencement);
- Residents of the development ineligible to apply for on-street parking permits in any existing or future residents parking scheme;
- £25,000 towards car club including free membership to residents of the development for three year period, and on-street parking bay; and
- 3 electric vehicle charging units – one of which to be on-street to be agreed with the Council's Environmental Officer.

### **Recommendation**

I would request that the following changes are made to the application prior to committee:

- Re-design the site access including build-out to enable the provision of the visibility splays;
- Re-design the site car park with 2.4m x 4.8m spaces and 6m aisles together with the extension of the footway and a marked out loading area;
- Reconsider the cycle storage provision for 32 flats;
- Show gates/shutters for the through building vehicle route so it can be locked at night preventing anti-social behaviour; and
- Relocate the pedestrian entry door.

If the applicant agrees to the S106 / S278 works and subject to conditions and informatives, and on the basis that all of the changes are made as described above

### 6.3 **Drainage Engineer**

No sustainable drainage report has been received by the LPA.

### 6.4 **Affordable housing**

30% of the housing on this site, should the development proceed should be affordable, and provided on site. Larger 2no and 3no bed units are preferred to single units as these are in extremely short supply.

### 6.6 **Daylight /Sunlight assessment**

A report by ACCON Environmental Consultants has been supplied with the application. The report has been independently verifies by Atkins Consultants who confirm their agreement with the conclusions. While the report confirms there will be loss of daylight and sunlight at many parts of the development, it does not consider this reduction to be unacceptable.

### 6.7 **Crime Prevention Design Advisor, Local Policing**

OBJECTION to the development proposals.

Car Park: From the documentation provided it is unclear if this car park is private (residential only) or will serve customers of the retail units or, both? The parking facility appears to have two access egress opportunities, is insecure and lacks natural surveillance. Car parks that aren't secure are extremely vulnerable to criminal activities. They also attract anti-social behaviour, street drinking and a place for the homeless to shelter. The fear of such crime may result in vulnerable

residents abandoning the parking facilities preferring to park where they and their vehicles can be seen, such as on the good deliveries and refuse access route. Additional information regarding the use function and security of this car park is requested.

*Access to car park (North elevation):* I have fundamental concerns regarding the proposed height and length of the vehicle access to the car park as it appears to create an enclosed, confined undercroft area that again lacks natural surveillance. I believe this area is likely to provide a location where individuals could shelter /gather/ sleep rough. Areas that lack natural surveillance and ownership are likely to attract crime, ASB, and increase the fear of crime. I would ask that this area is redesigned to omit or raise this undercroft area be raised to a minimum of 8m. This will 'open up' this area, reduce / remove the scene of enclosure, reducing the fear of crime. These amendments should be made prior to planning approval being considered. In addition if this access is to a private residential car park, I would ask that this be secured.

*Residential access:* From the plans provided it appears that the residential communal entrance is located (and accessible) from within the undercroft area identified as the car park vehicle access; This shared vehicle pedestrian access appears narrow and is likely to create conflict between residents, walking in opposite directions (access and exiting the building, with or without cycles), and vehicles using car park entrance. I would ask that this area be redesigned identifying a 3m pedestrian walkway, and indicate the extent of where the vehicle access will extend to must be submitted prior any planning approval.

*Excessive permeability:* I have fundamental concerns as to how this residential block will function. . From the documentation provided it appears that the ground floor 'lobby' and office space is linked via an access door, this layout confuses the public office and private residential space, it is unclear what function this serves or what behaviour or activity is accepted within each. It is unclear what activity/behaviour will be expected in any area and conflicting use and activity is likely to negatively impact on sense of residential ownership and community cohesion within the block This is a fundamental concern; I ask that the block be redesigned, separating commercial and residential activities.

*Excessive permeability:* I have fundamental concerns regarding the unrestricted access opportunities within the residential block. From the plans provided the residential corridor appears to links two cores creating unrestricted and excessive circular permeability through the block of 32 apartments. This layout provides opportunity for unauthorised individuals to freely move between floors providing a legitimate excuse for individuals to be in private areas where they have no right to be.. Crime and anti social behaviour are more likely to occur where there are several ways into, through and out of residential areas. This is a fundamental concern; I ask that the block be redesigned, separating residential cores from each other establishing individual access to each.

*Postal deliveries:* I cannot identify how the postal delivery will be managed or where the residential post boxes be? Best practice advises that Tradesman's Buttons (allowing postal deliveries) must not be fitted as unauthorised individuals can also

use these to gain access to private residential areas (negating any physical security a closed door offers) The preferred management of mail delivery is either via external wall mounted letterboxes or via 'through the wall mail deliveries. This ensures the internal corridors and stairwells of the apartments remain private. I would ask that additional information regarding the location of mail boxes and management procedures detailing the management of postal deliveries to residents is submitted for approval prior to planning permission being granted

Refuse collection: From the plans provided details of the bin stores construction have been provided however I cannot identify how commercial and residential refuse storage areas will be managed,

Cycle storage facilities. Again I have fundamental concerns as to how this cycle storage facility will function. It appears that residents will be required to manoeuvre their cycles through residential communal access doors, lift, and private residential lifts and corridors. I question if the residential corridors are wide enough to allow residents with cycles to easily and safely pass in opposite directions. Creating conflict between cycle movement residents. Cycle storage facilities should be provided at ground floor, secured via electronic access controlled access system that allows access to authorised residents only.

All Residential Block Physical Security:

The Design and Access Statement (DAS) does not appear to make reference to the NPPF Section 58 and 69, and does not identify or demonstrate how the development will create a 'Safe and accessible environment where crime and disorder, and the fear of crime will not undermine quality of life or community cohesion'.

This is a concern and if the proposals gain planning approval would ask that a condition is imposed on this application to ensure that, any subsequent approved development is required to achieve layout and security of Secured by Design (SBD) accreditation. Such a condition will help to ensure that the development achieves the highest standards of design in terms of safety and security. This would not only ensure that crime prevention design is incorporated within the development but also assist the authority in satisfying the requirements of NPPF

To ensure that the opportunity to design out crime is not missed, I would urge the authority to attach the following (or a similarly worded) condition upon any approval for this application; No development shall commence until details of the measures to be incorporated into the development to demonstrate how 'Secured by Design' accreditation will be achieved have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details, and shall not be occupied or used until the Council has acknowledged in writing that it has received written confirmation of SBD accreditation.

*SBD includes the following elements relevant to this site. Justification for the requested condition are clarified in the following observations;*

*Access and movement: Given the number of residential blocks and apartments within them, All Communal entrance access control systems must include electronic lock*

*release with audio and visual intercom link to each apartment, capable of capturing, recording and storing images of individuals using the door entry panel. This will allow residents to communicate with their visitors without having to open their front door and speak to them face-to-face as this allows them to filter who is allowed into the building and up into their flat.*

*Residential floor secondary security doors (segregation): The option to move freely between floors combined with the lack of natural surveillance within the core areas increases the need to maintain ownership of these areas via physical security measures. In order to prevent unauthorised access onto and between residential floors, I would ask that secondary security doors sets (that meet the minimum physical security standards of PAS 24:2012) isolate the core from private residential corridors, these in turn must be controlled by an electronic lock release system with intercom audio link to apartments. Enabling residents to identify visitors and control access whilst maintaining a safe and secure distance. Access to communal areas, parking facilities should be treated in the same way and only accessible by authorised individuals.*

*Residential door Sets: Individual flat entrance doors must also comply with ADP-Q, and meet the minimum physical security requirements of PAS24:2012.*

## 6.8 **Environmental Protection**

This is a change of use from A1/B1 to C3 Residential with a significant increase in residential units from 1 to 32 at first, second and third floor and retention of offices and retail storage at ground floor a net reduction of 1 car parking space.

The location of the site means that occupiers of the site will need to travel either through the Tuns Lane AQMA Via Church Street onto Tuns Lane The site is located within/or close to a residential area and mixed use area and in my opinion environmental noise is unlikely to be a material consideration

The proposed stacking and noise insulation measures to minimise noise transmission between flats is a Building Control requirement.

We need to know what the net trip rates for this development to determine the level of potential impact on our AQMA and damage costs associated with that impact. It is noted within the applicants planning statement section 4.3 that a financial contribution towards increase trip generation and on-street parking demand may be sought, In light of the Low Emission Strategy being developed, the existing statutory Air Quality Action Plan in place and the existing ongoing exceedances of air quality levels within the Tuns Lane AQMA and Town Centre AQMA we would be seeking a s106 contribution from this development and are of the view it would be most appropriately spent on setting up an EV car club that occupiers of the development could potentially use particularly as only 12 spaces will be allocated for residential parking. The EV car club would be within the zone identified for this development which is Tuns Lane Zone.

1. The location of the site means noise is unlikely to be a material concern. The site lies approximately 600m east of Tuns Lane Air Quality Management Area 3. Traffic to the site is most likely to travel via the Tuns Lane AQMA

either north or south.

The first question is an Air Quality Assessment Required?

2. An air quality assessment will not be required.

This is based on IAQM guidance. Air Quality Management: Land Use Planning & Development Control: Planning for Air Quality (May 2015)

A two stage approach is advocated: Stage 1 Criteria two key criteria to be met before proceeding to stage 2:

Stage 1 Criteria - If any of the following apply

A) Is development 10 or more residential units/or a residential site area or more than 0.5ha/or more than 1000m<sup>2</sup> of floor space for all other uses/or a site area greater than 1ha? (YES)

AND

B) The development has more than 10 parking spaces/or the development will have a centralised energy facility or other centralised combustion process (YES)

Stage 2 Criteria - Specific Details

There are eight categories within the specific details section. I will refer to the categories that are potentially relevant to this development in bullet points below:

- Will the development lead to a significant change in Light Duty Vehicles (LDV) traffic flows on local road with relevant receptors (LDV is any vehicles below 3.5 tonne gross weight) - A change of HDV flows of – more than 100 AADT within or adjacent to an AQMA (in my professional view this means 100 AADT of operational movements through our AQMA 3). This is unlikely (NO) but there is no transport report and you may require Council input to determine likely trip rates.
  - The development will lead to a significant change in Heavy Duty Vehicles (HDV) traffic flows on local road with relevant receptors (HDV is any vehicles above 3.5 tonne gross weight) – A change of HDV flows of – more than 25 AADT within or adjacent to an AQMA (this may apply during the construction phase, it is not clear from the transport assessment undertaken by pba, the fleet characteristics of trips to and from the site, this does need quantifying?). This is unlikely (NO)
3. We have a draft Low Emission Strategy Programme, and an existing Air Quality Action Plan covering AQMA 3 (Tuns Lane) which includes a requirement Public EV provision and Electric EV car club provision across the Borough. The total programme for EV public infrastructure provision (fast and rapid) and EV car club 'Borough Wide' is approximately £2million. This programme will be formally implemented within our Low Emission Strategy in Summer 2016.
4. We are currently seeking S106 contributions, from developments that impact on our local air quality management areas, towards this programme, the

contribution will be based on (Offsetting Emission Approach) as advocated by IAQM guidance Section 5.11 – 5.15.

5. We will be seeking a S106 contribution based on net increase in trip generation from all vehicles using the site whether for commercial or customer purposes. In other words we require a complete fleet profile for the operational phase of the development and the corresponding trip generation once this has been agreed with Transport. It would be useful if the applicant is able to provide this information.
6. Additionally we also expect on site mitigation to reduce the impact of property and road generated emissions on our existing air quality management area.

The guidance I refer to is the Institute of Air Quality Management: Land Use Planning & Development Control: Planning for Air Quality (May 2015)

#### Principles of Good Practice IAQM

##### Design + Construction Phase

- New development should not contravene the **Councils Air Quality Action Plan** or render the mitigation measure unworkable
- New development should be designed to minimise public exposure to pollution sources, by locating habitable rooms away from busy roads.

The Councils Air Quality Action Plan 2012 advocates the following measures relevant to this development

- Securing financial contributions from development proposals for improving transport links, developing transport hubs (Slough Town Centre, and Slough Trading Estate) and improving the Borough's railway stations. (The EV programme is aimed at supporting the LSTF smarter travel project and actually builds onto this project). The Council wants to build EV transport hubs at all these strategic locations. These measures will support our Low Emission Strategy and longer term objectives of reducing NOx and PM emissions.
- Promoting Sustainable forms of travel: Promotion of electric/low emission vehicles; provision of electric vehicle recharging points in Council car parks, and, where possible, in new development. Our Low Emission Programme also considers on street EV charging points.
- Explore potential for future town centre residents' car club; we have expanded our ambitions to look at Borough wide EV car club. This development is located close to the Town Centre and would benefit from an EV car club.

No objection is made to the application proposals subject to the imposition of appropriate conditions .

#### **PART B: PLANNING APPRAISAL**



## 7.0 **Policy Background**

7.1 The application will be assessed against the following policies:

### 7.2 The National Planning Policy Framework (NPPF) 2012 and the Planning Practice Guidance

In its overarching Core Principles the National Planning Policy Framework states that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units infrastructure and thriving local places that the country needs..... and requires that planning should always seek to secure high quality design and a good standard of amenity for all existing and futures occupiers. The NPPF further states that: good design is a key aspect of sustainable development is indivisible from good planning and should contribute positively to making places better for people

Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.....To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

### 7.3 Local Development Framework, Core Strategy 2006-2026, Development Plan Document December, Adopted December 2008

- Core Policy 1 (Spatial Strategy)
- Core Policy 3 (Housing Distribution)
- Core Policy 4 (Type of Housing)
- Core Policy 6 (Retail, leisure, and community facilities)
- Core Policy 7 (Transport)
- Core Policy 8 (Sustainability and the Environment)
- Core Policy 9 (Natural and Built Environment)
- Core Policy 12 (Community Safety)

### 7.4 Adopted Local Plan for Slough, Adopted 2004

- EN1 (Standards of Design)
- EN3 (Landscaping Requirements)
- EN5 (Design and Crime Prevention)
- H13 (Backland/Infill Development)
- H14 (Amenity Space)
- T2 (Parking Restraint)
- T8 (Cycling Network and Facilities)
- T9 (Bus Network and Facilities)
- OSC 15 –provision of facilities in new residential developments
- OSC17 (Loss of Community, Leisure or Religious Facilities)

7.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission are determined in accordance with the

development plan unless material considerations indicate otherwise. Annex 1 to the National Planning Policy Framework advises that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

The Local Planning Authority has published a self assessment of the Consistency of the Slough Local Development Plan with the National Planning Policy Framework using the PAS NPPF Checklist.

The detailed Self Assessment undertaken identifies that the above policies are generally in conformity with the National Planning Policy Framework. The policies that form the Slough Local Development Plan are to be applied in conjunction with a statement of intent with regard to the presumption in favour of sustainable development.

It was agreed at Planning Committee in October 2012 that it was not necessary to carry out a full scale review of Slough's Development Plan at present, and that instead the parts of the current adopted Development Plan or Slough should all be republished in a single 'Composite Development Plan' for Slough. The Planning Committee endorsed the use of this Composite Local Plan for Slough in July 2013.

The Council has also formally announced its intention to prepare a Local Plan Development Plan Document and has recently sought comments on the proposed scope and content of the document.

#### 7.6 Other Relevant Documents/Statements

Slough Borough Council Developer's Guide Parts 1-4  
Slough Local Development Framework Proposals Map  
Planning Guidelines for Flat Conversions (Indicative Room Sizes)

The site is not an allocated site in the Slough Local Development Framework Site Allocations Development Plan Document

#### 7.7 The main planning considerations are considered to be:

- Principle of development
- Design and appearance on the character of the area
- Impact on neighbouring Uses/Occupiers
- Transport, Highways and parking
- Housing Mix & Affordable Housing
- Quality of Housing
- Noise
- Flood Risk & Sustainable Drainage System

#### 8.0 **Principle of Development**

8.1 At the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a "golden thread running through both plan making and decision taking". In respect of decision taking this means inter alia approving

development proposals that accord with the development plan without delay.

Twelve core planning principles are identified which both should underpin plan making and decision taking. A number of these core principles are relevant to the current proposals being:-

- Always seek to secure a quality design and a good standard of amenity for all existing and future occupants of land and buildings
- Support the transition to a low carbon future in a changing climate, taking full account of flood risk, the reuse of existing resources and the encouragement for using renewable resources
- Encourage the effective use of land by reusing land that has previously been developed, provided that it is not of high environmental value
- Actively manage patterns of growth to make the fullest possible use of Public Transport, walking and cycling, and focus significant development to locations which are or can be made sustainable.

8.2 **Core Policy 1** sets out the overall spatial strategy for Slough requiring all developments to take place within the built up area, predominately on previously developed land. The policy seeks to ensure high density housing is located in the appropriate parts of Slough Town Centre with the scale and density of development elsewhere being related to the sites current or proposed accessibility, character and surroundings. It states that :  
*“All development will have to comply with the Spatial strategy set out in this document.....  
Proposals for high density housing will be located in the appropriate parts of Slough Town centre.....  
Elsewhere the scale and density of development will be related to the sites current or proposed accessibility, character and surroundings. Significant intensification of use will not be allowed in locations that lack the necessary supporting infrastructure, facilities or services”*

8.3 **LDF Core Policy 4** again emphasises that high density housing should be located in the Town Centre area and that outside the Town Centre the development will be predominately family housing, at a density related to the character of the area. In particular, in suburban residential areas, there will only be limited infilling consisting of family houses which are designed to enhance the distinctive suburban character and identity of the area.  
Core Policy 4 states :  
*“ High density housing should be located in Slough Town Centre In the urban areas, outside the town centre , new residential development will predominately consist of family housing, and be at a density related to the character of the surrounding area , the accessibility of the location, and the availability of existing and proposed local services, facilities and infrastructure. Within existing suburban residential areas, there will only be limited infilling which will consist of family houses that are designed to enhance the distinctive suburban character and identity of the area.”*

The site is not identified as a development site within the Slough Local Development Framework Site Allocation Document DPD.

8.4 The application site is outside Slough Town centre, and Core Policy states that in

that situation, the scale of the development should be of an appropriate scale. At present the Alexandra Plaza building has no residential use, but consists of retail on the ground floor, with the offices of the ground floor supermarket and some storage on the 1<sup>st</sup> floor. The existing 2<sup>nd</sup> floor of the building is unfinished, and unoccupied. The top floor plant room is only accessibly by ladder. An earlier prior approval consent related to the automatic approval office space to residential, however, in this case, the majority of the existing offices which relate to the supermarket, are to be retained, and there are no offices on the upper floor as it is unfinished and not usable. In any case, the “prior approval” for residential use of part of the building has now lapsed, so the application proposals need to be considered on their own merits.

- 8.5 The application proposals for 32no flats represent a dramatic change of use of the majority of the existing building, with the addition of a further storey. If permitted, this would create dense residential development in an area outside the town centre, which, at present, consists predominately of 2no storey terrace housing of around 7/8 meters in height. The application building which has a proposed additional storey, would be 13.5m in height.
- 8.6 In view of the above- it is considered that such a large 4no storey development of 32no flats, in an area which predominately consists of 2no storey terrace houses, would cause significant over-development, and over-intensification of the use of the site, contrary to Core Policies LDF 1 and 4.

#### *Guidelines for flat conversions*

- 8.7 Slough Borough Council “Guideline for flat conversions “ April 1992 states that Policy 14 of the Local Plan applies . Policy 14 states that :
- A satisfactory minimum room sizes and internal layouts are achieved
  - B satisfactory sound insulation measures are taken
  - C Adequate car parking provision is made on site
  - D Adequate garden area is provided at the rear of the property for each flat
  - E The size of any extensions to the property is not detrimental to the amenities of the area
- The Guidelines for flat conversions also specify minimum sizes as follows:]
- Studios – same as one bedroom units – 31.57sqm
  - 1 bedroom units 31.57 sqm
  - 2 bedroom units 39.93sqm
- 8.8 The application proposals are for 4no. studios, and 18no) one-bedroom and 10no two-bedroom development, within an enlarged building which is currently predominately in retail use. With the exception of 3no of the proposed apartments on the top floor, none of the remaining 29 apartments of the proposed development have any amenity space or even balconies. There is no external amenity space whatsoever.

In addition, 3no of the studio flats do not comply with the minimum size standards given above.

Numerous objections have been received in relation to the potential impact of the

development on the amenity of the area. In view of the above , it is considered that the application proposals do not comply with Local Plan Policy H14 , and do not comply with the space guidelines provided in “Guidelines for flat conversions” April 1992 , Slough Borough Council. It is therefore considered that the proposed residential units do not constitute High Quality Housing as advocated by the NPPF.

## 9.0 **Design and appearance on the character of the area**

9.1 The National Planning Policy Guidance, in its overarching Core Planning principles state that planning should: *Proactively drive and support sustainable economic development to deliver the homes, business and industrial units infrastructure and thriving local places that the country needs.....always seek to ensure high quality design and a good standard of amenity for all existing and future occupants of land and buildings .....housing applications should be considered in the context of the presumption in favour of sustainable development.....good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people.*

9.2 Core Policy 8 states that:

*“all development in the borough shall be sustainable, of a high quality design, improve the quality of the environment and address the impact of climate change.*

*With respect to achieving high quality design all development will be:*

*a) Be of a high quality design that is practical, attractive, safe, accessible and adaptable;*

*b) Respect its location and surroundings;*

*c) Provide appropriate public space, amenity space and landscaping as an integral part of the design; and*

*d) Be in accordance with the Spatial Strategy in terms of its height, scale, massing and architectural style.*

*The design of all development within the existing residential areas should respect the amenities of adjoining occupiers and reflect the street scene and the local distinctiveness of the area.”*

9.3 Policy EN1 of the adopted Local Plan requires that:

*“development proposals reflect a high standard of design and must be compatible with and/or improve their surroundings in terms of: scale, height, massing, bulk, layout, siting, building form and design, architectural style, materials, access points and servicing, visual impact, relationship to nearby properties, relationship to mature trees, and relationship to water courses.”*

The application proposals include the building of an additional storey onto the top of the existing building, and the re-cladding of the faces of the building. The proposed new roof line is stated to be related to the roof line of the adjacent church. The overall final appearance is of a very incongruous large building in an area dominated by terrace housing. The roof line, the cladding, the new top 3<sup>rd</sup> floor, all add to the bulk and scale of the building, which already heavily dominates the area. It is considered that the application proposals are not compatible with, nor do they improve the surroundings. The application proposals are therefore considered to be contrary to Policy EN1 of the Slough Local Plan.

## 10.0 Impact on neighbouring Uses/Occupiers

10.1 As stated previously, within the National Planning Policy Framework, twelve core planning principles are identified which both should underpin plan making and decision taking. A number of these core principles are relevant to the current proposals and include that planning should:

- *Always seek to secure a quality design and a good standard of amenity for all existing and future occupants of land and buildings.*

Core Policy 8 of the Slough Local Development Framework Core Strategy states that all development in the borough shall be sustainable, of a high quality design, improve the quality of the environment and address the impact of climate change. With respect to achieving high quality design all development will:

*b) respect its location and surroundings.*

Policy EN1 requires that development proposals reflect a high standard of design and must be compatible with and/or improve their surroundings in terms of.....*relationship to nearby properties*.....

10.2 The following potential impacts are identified:

The application proposals further increase the height and bulk of the existing Alexandra Plaza, through the addition of a further storey. The building currently is unoccupied on the second floor, and with offices and storage on the 1<sup>st</sup> floor so the issue of overlooking of neighbouring properties is at present very limited. However, should the development proceed, this would create a situation where the top three floors would contain a substantial number of windows overlooking neighbouring development on all four sides. In particular to the north, east and south, there are numerous small 2no storey terrace houses and their rear gardens, which would be within the view of many of the proposed apartments at Alexandra Plaza.

To the north, the upper three floors of the application proposals would have clear views over the rear gardens of the terrace of houses along King Edward S., starting at a distance of 15m.

To the east the terrace facing Chalvey Rd West would be visible from all three upper floors of the development starting at a distance of 11m.

To the SE, the upper 3no floors of the development would have views to the frontages and windows of terrace properties along Alexandra Rd, starting at a distance of 13m.

To the south, again the top 3no floors would have views over the rear gardens and windows of the west side of Alexandra Rd

To the SW the top three floors of the proposed development would views to the rear gardens and windows of properties along High St, starting at a distance of 33m

Due to the density and proximity of neighbouring low rise development, the privacy of a large number of properties and their gardens would be affected. It is therefore considered that the application proposals would create an unacceptable level of loss of privacy at neighbouring properties, and is contrary to Core Policy 8 and Local Plan Policy EN1.

## 11.0 **Quality of Housing**

11.1 The National Planning Policy Framework states that local planning authorities should aim *“to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.....”*

11.2 With respect to the unit sizes as indicated on the floor plans, these have been assessed against the Council’s Flat Conversion Guidelines. The floor spaces of each of the units do not fall within the Council’s guidelines, which start with a studio which should be a minimum of 40 sqm. The application proposals show 4no studio units at 30.25 sqm, which is considerably less than the Council minimum.

11.3 The application proposals therefore do not, in parts, meet Slough Council minimum size standards and it is considered to be contrary to the aspirations of the NPPF.

## 12.0 **Amenity**

12.1 Slough BC LDF Core Policy 8 section 2 c states that :  
*“All development will provide appropriate public space, amenity space and landscaping as an integral part of the design “*

The application proposals make no provision of general amenity space whatsoever. In addition, while 3no of the top floor flats are intended to have some limited outdoor space on the roof, none of the other proposed apartments have any outdoor space of any kind. There is no proposed provision of balconies. The locality of the application is densely developed and populated, with a general lack of amenity space and It is therefore considered inappropriate to permit a residential development of this number of housing units, without any specific amenity provision, as this is contrary to Core Policy 8.

## 13.0 **Transport highways and Parking**

13.1 The comments of the Highway officer contained in this report, sets out a range of requirements in order to make the development proposal comply with highways regulations and requirements. While the applicant has advised verbally that these works could be undertaken, no confirmation in the form of revised plans has been received. The application as it stands, therefore, does not meet the requirements of the highways officer, however this could be enforced by conditions.

## 14.0 **Flood Risk & Sustainable Drainage System**

14.1 The site is in Flood Zone 1.

On 6th April 2015, the government introduced a requirement for all major development schemes to comply with the current Sustainable Drainage Regulations. This is now a material consideration in the determination of major planning applications, which necessitates the drainage system being designed in detail at an early stage in the planning process. A sustainable drainage strategy has not been submitted with this application. The application therefore does not meet the requirements of Slough Borough Council Core Policy 8.

## 15.0 **Crime prevention**

- 15.1 Thames Valley Police have formally objected to the application on the grounds of :
- Lack of detail as to how the public/residential aspects of the car park, and how car park security will be managed
  - The access to the car park and its security
  - Security of the residential access
  - The excessive permeability of the block
  - Postal deliveries and security
  - Refuse collection

15.2 Residents have also confirmed in there many objections to the scheme, the level of concern about crime in this locality. While it can be possible for designs to be modified to meet “*Designing out crime*” requirements, it is of considerable concern that the level of change required to meet these requirements is substantial. This, along with the other matters rained within this report, means that it is considered that it would be inappropriate to grant a consent on this development prior to a demonstration that security and crime concerns can be fully met. The comments of the Thames Police have been sent to the applicant, and no proposed amendments have been received. It is therefore considered that the application proposals doe not meet Thames Valley Police “Designing out crime “requirements.

## 16.0 **PART C: RECOMMENDATION**

It is considered that the proposed development does not enhance the character in terms of the design of the proposed additional floor, do not provide high quality housing as encouraged by the NPPF, whilst resulting in a loss of privacy for the existing residential properties and not providing a secure and safe living environment for the future occupiers. The proposal is therefore considered to be unacceptable and recommended for refusal.

## 17.0 **PART D: REASONS FOR REFUSAL**

**1 Quality of Housing:** The application proposals would damage the privacy of numerous surrounding properties due to overlooking, loss of privacy, and its overbearing bulk and scale. In addition the development does not fulfil the space requirements of the Slough Borough Council “Guidelines for flat conversions “ 1992, as the studio apartments are undersized, and in addition the requirements of Local Plan Policy H14 in relation to room sizes, car parking provision, adequate garden area, and impact on local amenity are not met. With the exception of 3no of the apartments on the top floor, none of the remaining 29no apartments have amenity space of any kind. The application is therefore contrary to Policies EN1 (a,b,c,f,g,i,j,k) and H14 of the Adopted Local Plan for Slough, Adopted 2004, Guidelines for flat conversions (April 1992) (Slough Borough Council), Core Policy 8 (section 2) of the Local Development Framework, Core Strategy 2006-2026, Development Plan Document, Adopted December 2008 and the NPPF.

**2 Design out of place in local context** - The design of the proposals are sharply discordant with the architecture of the surrounding area, and with its larger scale than the existing building, do not provide any architectural enhancement to the area.



Contrary to Core Policy 8 Sustainability and the Environment section 2 (a) and (b), of the Local Development Framework, Core Strategy 2006-2026, Development Plan Document, Adopted December 2008.

**3 Drainage** – In the absence of a drainage report and sustainable drainage strategy, the applicant has not demonstrated that the proposed development would make sufficient foul and surface water arrangement to serve the needs of the proposed future occupants and preserve the water quality of the surrounding area. The Local Planning Authority is therefore of the opinion that the proposed development does not comply with Core Policy 8 - Sustainability and the Environment Section 1 (E) of the Local Development Framework, Core Strategy 2006-2026, Development Plan Document, Adopted December 2008

**4 Designing out crime** - The application proposals do not meet the requirements of Thames Valley Police in relation to Designing out crime in order to reduce crime in Slough due to the concerns raise relating to the design of the car park, the access to the car park, the residential access, the excessive permeability in relation to the ground floor lobby, and the unrestricted access opportunities within the residential block, refuse collection areas, cycle storage facilities and the physical security of the overall block. The proposal will therefore not reduce crime within Slough and does not meet the requirements of the Thames Valley Police Designing out crime strategy, contrary to Core Policy 12 (Community Safety) of the Local Development Framework, Core Strategy 2006-2026, Development Plan Document, Adopted December 2008, and Policy EN5 - Design and crime prevention of the Adopted Local Plan for Slough, Adopted 2004