

DATED JUNE 2014

**Town and Country Planning Act 1990
(As Amended)
Planning Statement**

Full planning application for the redevelopment of the Former Slimma Fashions Site for 100% affordable housing comprising 20no. houses and 12no. supported living apartments, resubmission of 13/00462/FUL_MJ the subject of a split appeal decision.

Site: Former Slimma Fashions Factory, Barngate Street, Leek

Applicant: Renew Land Developments Limited and The Wrekin Housing Trust

1.	INTRODUCTION.....	3
2.	SITE AND SURROUNDINGS.....	4
3.	THE PROPOSAL	4
4.	PLANNING HISTORY	5
5.	THE DEVELOPMENT PLAN & OTHER MATERIAL CONSIDERATIONS	6
6.	KEY ISSUES.....	11

1. INTRODUCTION

- 1.1 This planning statement has been prepared to accompany a resubmission application for the redevelopment of the Former Slimma Fashions Factory site for the erection of 20no. houses and 12no. assisted living apartments, which were the subject of a refusal by the LPA and subsequent split appeal decision. The appeal decision allowed the proposed 20no. dwellings but refused the 12no. assisted living apartments. This resubmission application is made on behalf of the applicant Renew Land Developments Limited and The Wrekin Housing Trust.
- 1.2 The principle of residential redevelopment therefore has been secured on the site and the only issue to be considered by the LPA in this resubmission is the acceptability of the proposed 12no. assisted living apartments. This statement demonstrates that the proposed revisions to the scheme have addressed the Inspector's reasons for issuing a split decision.
- 1.3 The appeal decision confirms that the site is from an environmental perspective, very sustainable. The Inspector also concluded that significant weight should be attributed to the social sustainability of the site in providing 100% affordable housing to a good standard in the context of an overall poor delivery.
- 1.4 The Inspector concluded that the proposed terraces would introduce a complementary design to this street scene that would reinforce local distinctiveness, without deliberately trying to copy the other houses in these streets.
- 1.5 With regard to the proposed apartments the Inspector stated:
- "Parts of the frontages to Barngate and Waterloo Streets are to be occupied by a three storey building that would contain 12 apartments. This has been designed with large windows that would have a similar appearance and detailing to those that populated the previous building that stood on this part of the site. Its form and design would be sympathetic to the character and appearance of the listed mill opposite."*
- 1.6 The proposed design of the apartment building therefore in the context of the listed building was concluded to be appropriate. The Inspector further reiterated:
- "The proposed terraces and the apartment block demonstrate a good quality of design, which takes account of the scale, character, siting, alignment, mass, design, colour and materials of their surroundings and meet the requirements of saved LP Policy B13 and CS Policy DC1."*
- 1.7 Notwithstanding the Inspector's conclusions regarding the design and appearance of the proposed apartments, it was concluded that the proposed siting and scale/height of the apartment building, mindful of its impact on the views of the listed Waterloo Mill along Barngate Street, was inappropriate to the setting of the listed building.
- 1.8 This revised scheme would reduce the height of the proposed apartment block, providing accommodation over two floors; a height commensurate therefore with the approved dwellings. It is considered that this revised scheme has taken full account of and addressed the Inspector's reasons for dismissing this element of the appeal scheme. In addition, prior to

the submission of this amended scheme a pre-application meeting has been held with the LPA. Positive feedback was received from the LPA and further tweaks suggested with regard to the design of the revised scheme. These amendments have been made and form part of the submitted scheme (meeting with Chris Johnston, 30th May 2014).

2. SITE AND SURROUNDINGS

- 2.1 The site is approximately 0.35 hectares in area and is located on Barngate Street, Leek. The site comprises an island of built development, bounded by Waterloo Road to the north, Barngate Street to the east, James Street to the south and Langford Street to the west.
- 2.2 The site previously accommodated a mix of single and two storey, vacant factory buildings constructed in the late 19th and early 20th century of predominantly red facing brick construction. The northern elevation featured some ornate stone detailing which is to be retained and reused in the proposed apartment block. The roof comprised natural slate and featured a section of northern lights to the north elevation, however these were in a poor state of repair. There was also a tall chimney within the site and an electrical sub-station is still located within the site boundary. Since the time of the original application however the buildings have been demolished and the site has been cleared.
- 2.3 The surrounding buildings largely comprise traditional terraced housing of 2 storeys in height. On the northern side of Waterloo Road is Waterloo Mill, a five storey Grade II listed building that has recently undergone conversion to apartments.
- 2.4 The site is sustainably located, within walking distance of Leek town centre where there is an abundance of local shops and services to meet everyday needs. Furthermore, there are bus stops located within 0.1km of the site (on West Street), providing regular services to Leek town centre and beyond. The site is also within walking distance of local primary school, Westwood First School, and high school, St Edwards Church of England High School.

3. THE PROPOSAL

- 3.1 The proposal comprises the redevelopment of the former Slimma Fashions Factory, Barngate Street, Leek for 100% affordable housing. This application seeks full consent for the erection of 32no. units, comprising 20no. houses, and 12no. supported living apartments. However, the 20no. houses have already been approved under appeal reference 2204739. This resubmission application therefore seeks an alternative design to the refused apartment block.
- 3.2 In summary the amendments to the apartment block are as follows:
 - (a) Reduction in height from three storey to two;
 - (b) Amended roof design, incorporating a low parapet enabling a set back, lower pitch roof;
 - (c) Amendments to the building entrance aesthetic design on Barngate Street; and

(d) Building has been set back from Barngate Street slightly;

- 3.3 The proposed affordable homes would be delivered by The Wrekin Housing Trust, with the 12no. apartments to be managed by Choices Housing Association. The Wrekin Housing Trust's commitment to the proposals and to work in partnership with Staffordshire Moorlands District Council on the allocation of the proposed homes, plus information on the level of need for the proposed affordable homes (including the 12no. supported living apartments), is confirmed in the letter at Appendix A. The draft Heads of Terms for a Section 106 Agreement confirming the commitment to provide 100% affordable housing are contained at Appendix B; these match the requirements of the Section 106 agreed as part of the appeal scheme and an updated Section 106 will be produced during the course of this resubmitted planning application (as discussed at the pre-application meeting of the 30th May 2014).
- 3.4 The proposed apartments would be managed by Choice Housing Association, and would provide supported housing for adults with learning disabilities and/or other disabilities. The nature of this type of housing means that Choices are able to provide a level of support that enables tenants to live as independently as possible. Much of the support that would be offered to tenants would be in respect of the maintenance of the tenancy, for example assistance with budgeting, paying bills and dealing with correspondence. In addition the resource centre would allow support workers space to teach tenants and assist them with activities such as learning to cook healthy meals.
- 3.5 The proposed development is explained in more detail in the Design and Access Statement.

4. PLANNING HISTORY

- 4.1 The site has been subject to two previous applications as follows (this application being a resubmission of 13/00462/FUL_MJ):

Application Number	Description	Decision
13/00462/FUL_MJ	The demolition of existing buildings and redevelopment for 100% affordable housing comprising 20 No. houses and 12 No. apartments.	Refused 28 August 2013 Appeal Split Decision 16 April 2014
09/00971/OUT_MJ	Demolition of existing buildings, construction of 25no. dwellings consisting of 23no. 2 bedroom, 2 storey town houses and 2no. 2 bedroom apartments with associated access, parking and communal area	Withdrawn

5. THE DEVELOPMENT PLAN & OTHER MATERIAL CONSIDERATIONS

- 5.1 The operative Development Plan comprises the recently adopted Core Strategy (March 2014). The other “*material considerations*” to which Section 38(6) refers include national planning policies and guidance and the site specifics.
- 5.2 The Core Strategy has replaced those previously saved Local Plan policies which were referred to in the LPA’s reasons for refusal of the original scheme and in the Inspector’s decision notice. The Core Strategy policies that are pertinent to the consideration of this application therefore are summarised below.

Policy Number	Policy Title	Summary
H1	New Housing Development	States that new housing development should provide for a mix of housing sizes, types and tenure including a proportion of affordable housing as set out in policy H2, and where appropriate housing for special groups, to meet the needs and aspirations of the current and future population having regard to the Area Strategies in SS5 and SS6. All development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets identified local housing market needs and the strategy for the area having regard to the location of the development, the characteristics of the site and the economics of provision.
DC1	Design Considerations	This sets out that all development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with the Council’s Design SPD.
DC2	The Historic Environment	The Council will safeguard and enhance the historic environment by resisting development which would harm or be detrimental to the special character and historic heritage of the District’s towns and villages; promoting development which sustains, respects and enhances buildings and features which contribute to the character or heritage of an area through the use of conservation area

		appraisals, design statements, and masterplanning; and preventing the loss of buildings and features which make a positive contribution to the character or heritage of an area through the appropriate reuse and sensitive development.
SS1	Development Principles	<p>The Council will expect the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands in terms of delivering (inter alia) a mix of types and tenures of quality, affordable homes to meet the needs and aspirations of the existing and future communities and development which maintains the distinctive character of the Staffordshire Moorlands, its individual towns and villages and their settings.</p> <p>New development will make the best use of previously developed land and buildings and will follow a sequential approach to the sustainable location of development.</p>
SS2	Future Provision of Development	Provision will be made for 6000 additional dwellings (net of demolitions) to be completed in Staffordshire Moorlands (excluding the Peak District National Park) during the period 2006 to 2026.
SS5	Towns	<p>Leek is identified as one of three towns in the district, these settlements will accommodate the bulk of the District's housing, employment and retail needs.</p> <p>To encourage best use of land in the urban area, this development will be managed by phasing through the Site Allocations DPD to ensure that priority is given to bringing forward development on previously developed sites and other sites delivering significant infrastructure provision.</p>
SS5a	Leek Area Strategy	The Council and its partners will seek to consolidate the role of Leek as the principal service centre and a market town and support its regeneration. This will be achieved through the following actions (inter alia): continue to

		meet housing and community needs of Leek and its rural hinterland by increasing the range of available and affordable house types, allocating a range of deliverable sites both within the urban area and on land adjacent to the urban area.
H2	Affordable and Local Needs Housing	Schemes proposing 100% affordable housing will be targeted to those areas in greatest demonstrable need.

Material Considerations

National Planning Policy Framework

- 5.3 At the heart of the National Planning Policy Framework is a *presumption in favour of sustainable development*, which should be seen as a golden thread running through both plan-making and decision-taking.
- 5.4 For decision-taking this means:
- Approving development proposals that accord with the development plan without delay; and
 - Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted
- 5.5 Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.
- 5.6 The Framework seeks to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. In order to achieve this local planning authorities should:
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
 - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and

- Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

5.7 The Framework aims to significantly boost the supply of housing, to do this local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- Identify a supply of specific, developable¹² sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- Set out their own approach to housing density to reflect local circumstances.

5.8 Paragraph 49 confirms that 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.

5.9 Paragraph 56 confirms that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

5.10 Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

- 5.11 Planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
- 5.12 Paragraph 129 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.13 Paragraph 131 states that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 5.14 Paragraph 134 confirms that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 5.15 Paragraph 137 states that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

National Planning Practice Guidance

- 5.16 Paragraph 002 Reference ID: 26-002-20140306 notes that *'good design responds in a practical and creative way to both the function and identity of a place'*. Furthermore, paragraph 024 Reference ID: 26-024-2014030 highlights the need to consider layout, and how buildings, street blocks, routes and open spaces are positioned in an area and how they relate to each other. This states that *'New development should look to respond appropriately to the existing layout of buildings, streets and spaces to ensure that adjacent buildings relate to each other'*.
- 5.17 This paragraph also notes that *'The layout of areas, whether existing or new, should be considered in relation to adjoining buildings, streets and spaces; the topography; the general pattern of building heights in the area; and views, vistas and landmarks into and out of the development site'*.

5.18 This paragraph reiterates the importance of designs ensuring that new and existing buildings relate well to each other and that streets are connected.

5.19 This paragraph goes on to note that:

“In general urban block layouts provide an efficient template with building fronts and entrances to public spaces and their more private backs to private spaces. Such layouts minimise the creation of unsupervised and unsafe public spaces and unsafe access routes.”

5.20 Paragraph 027 Reference ID: 26-027-20140306 refers to the need for careful consideration of items such as doors, windows, porches, lighting, flues and ventilation, gutters, pipes and other rain water details, ironmongery and decorative features.

5.21 Paragraph 007 Reference ID: 26-007-20140306 states that ~~“Standard solutions rarely create a distinctive identity or make best use of a particular site+.~~

6. KEY ISSUES

6.1 This application comprises a resubmission of refused application 13/00462/FUL_MJ. The LPA's refusal was appealed and the Inspector concluded that the proposed 20no. houses are acceptable and granted permission accordingly. However with regard to the 12no. apartments the Inspector considered that due to the scale and siting of the proposed apartment block the setting of Waterloo Mill would not be preserved and by the same token the living conditions of no.33 Waterloo Street would be unacceptably harmed.

6.2 The key issues therefore in the consideration of this application are as follows:

- (a) Acceptability in Principle;
- (b) Design;
- (c) Impact on Residential Amenity;
- (d) Impact on the Listed Building; and
- (e) Impact on the Highway Network.

Acceptability in Principle

6.3 The principle of residential redevelopment has been secured on the site by way of the partial approval of the appeal, allowing the 20no. proposed dwellings.

6.4 The appeal decision confirms that the site is from an environmental perspective, very sustainable. The Inspector also concluded that significant weight should be attributed to the social sustainability of the site in providing 100% affordable housing to a good standard in the context of an overall poor delivery.

- 6.5 This application seeks another consent for the previously approved 20no. dwellings with no alterations to the approved scheme, and the erection of a redesigned apartment building.
- 6.6 The LPA continue to be unable to demonstrate a five year supply of deliverable housing land, therefore triggering paragraphs 29 and 14 of the Framework. The LPA's policies on housing land are to be considered out of date and there is an overriding presumption in favour of sustainable development.
- 6.7 The proposal would provide 100% affordable housing for which there is a significant local need as a result of poor delivery in the past. This is acknowledged by the Inspector in his decision as follows:

"The Council's Strategic Housing Market Assessment (2008) suggests that there is a significant requirement for affordable homes within Staffordshire Moorlands. In the years between 2000 and 2012 only 318 affordable houses were completed in the District. The CS suggests that there is a need for 375 specifically in Leek between 2006 and 2026, very few of which have been built to date. This performance represents a very significant shortfall and there clearly needs to be a step change in the delivery of affordable housing both within Staffordshire Moorlands in general and Leek in particular. Paragraph 54 of the Framework refers to the need to plan housing development to reflect local needs, particularly affordable housing."

- 6.8 The Inspector goes on to state:

"The appeal proposals would contribute to the meeting of this identified need at a time when the recession is still affecting private house building and the means to create affordable housing on a large scale are limited. The ability of the site to provide affordable homes that would be constructed to Code for Sustainable Homes Level 3 standard, encouraged by the Framework, would assist in supplying the housing required to meet the needs of present and future generations at Leek to a good standard. This contribution to social sustainability, in the context of an overall poor delivery of affordable homes, attracts significant weight."

- 6.9 This resubmission application seeks a full permission for the entire site; it features the previously approved proposed dwellings and a redesigned apartment block. The proposed 12no. apartments are the only element not previously approved, however they were found to be acceptable in principle by the Inspector who commented as follows:

"Parts of the frontages to Barngate and Waterloo Streets are to be occupied by a three storey building that would contain 12 apartments. This has been designed with large windows (sic) that would have a similar appearance and detailing to those that populated the previous building that stood on this part of the site. Its form and design would be sympathetic to the character and appearance of the listed mill opposite." ...

... "The proposed terraces and the apartment block demonstrate a good quality of design, which takes account of the scale, character, siting, alignment, mass, design, colour and materials of their surroundings and meet the requirements of saved LP Policy B13 and CS Policy DC1." ...

...“I consider the design of the terraced dwellings and the apartment block to be in keeping with the character of the listed mill.”

- 6.10 The Inspector concluded that the site is a sustainable location for residential development in the context of the meaning within paragraph 7 of the Framework, convincingly meeting the environmental, social and economic roles of sustainability.
- 6.11 It is asserted therefore that the principle of residential development at this site is accepted and moreover supported and encouraged by the National Planning Policy Framework.

Design

- 6.12 As mentioned in the above section, the Inspector concluded that the proposed design and appearance of the development is entirely acceptable, appropriate and well designed in relation to the character of the area and Listed Mill building. The proposal seeks the exact same development of 20no. houses, the design and appearance of these has not altered from the approved scheme. However, the proposed apartment block has been altered in terms of its external appearance and significantly in relation to its scale and size.
- 6.13 The Inspector concluded that the proposed terraces would introduce a complementary design to this street scene that would reinforce local distinctiveness, without deliberately trying to copy the other houses in these streets.
- 6.14 With regard to the proposed apartments the Inspector stated:

“Parts of the frontages to Barngate and Waterloo Streets are to be occupied by a three storey building that would contain 12 apartments. This has been designed with large windows that would have a similar appearance and detailing to those that populated the previous building that stood on this part of the site. Its form and design would be sympathetic to the character and appearance of the listed mill opposite.+

- 6.15 The proposed design of the apartment building therefore in the context of the listed building was concluded to be appropriate. The Inspector further reiterated:

“The proposed terraces and the apartment block demonstrate a good quality of design, which takes account of the scale, character, siting, alignment, mass, design, colour and materials of their surroundings and meet the requirements of saved LP Policy B13 and CS Policy DC1+.

- 6.16 Notwithstanding the Inspector’s conclusions regarding the design and appearance of the proposed apartments it was concluded that the proposed siting and scale/height, mindful of its impact on the views of the listed Waterloo Mill along Barngate Street, was inappropriate to the setting of the listed building.
- 6.17 This resubmission therefore seeks an alternative scheme of a materially reduced scale for the apartment block in direct response to the Inspector’s comments. This application seeks to erect a two storey apartment block with a reduced height and alterations to the external appearance and roof design.

- 6.18 The previous factory buildings along the frontage to Waterloo Street and where it met Barngate Street were single storey in terms of internal layout, however they measured approximately 7.5-8m in height (height from the pavement varies due to incline along Barngate Street) and these buildings were directly sited to the edge of the pavement.
- 6.19 The refused apartment block was proposed to be three storeys in height, measuring approximately 12-12.5m. The building was proposed to be sited at a slight set back in comparison to the factory buildings, however the Inspector concluded that this proposal in terms of scale and siting would be detrimental to the setting of the listed building and living conditions of 33 Waterloo Street (which are discussed in the following section).
- 6.20 The amended scheme would measure approximately 8.1-8.5m (to the ridge, 6.5-7m to the parapet) in height and would be set back from the edge of the pavement in comparison to the previous factory buildings. This height is similar to the surrounding terrace houses and the approved development within the remainder of the site. This results in a scheme commensurate in scale to the surrounding terrace properties whilst retaining views to the listed Waterloo Mill along Barngate Street and enhancing its setting.
- 6.21 The redesigned apartment block would feature a low parapet roof which would allow the pitched element of the roof to be set back from the eaves allowing greater views of the Listed Building as one travels along Barngate Street.
- 6.22 The Barngate Street elevation of the apartment block would feature an amended design entrance door, with an arched brick detail portico with fan light. This is similar to the design of the previous factory entrance to this elevation.
- 6.23 It is asserted that the proposed apartment block offers a much improved design and appearance over and above that previously accepted by the Inspector. Furthermore the amended scheme seeks a significantly reduced scale and height to this building thereby ensuring longer distant views of Waterloo Mill whilst strengthening and enhancing the general character of the area.

Impact on Residential Amenity

- 6.24 The aforementioned alterations to the design and scale of the apartment block would result in a much improved aspect for no. 33 Waterloo Street in comparison to the previous proposal. It is considered that the proposed reduction in height would greatly reduce any impact on no. 33 Waterloo Street and bring the proposal more in line with the existing situation in the surrounding terraced streets.
- 6.25 The proposed building would measure 8.1-8.5m (to the ridge, 6.5-7m to the parapet) in height; this is in comparison to the previous factory buildings which were 7.5-8m in height. The proposal therefore seeks an increase of around 0.5m in height in comparison to the previous factory building (at its highest point, i.e. the ridge); this is at least 4m lower than the refused scheme at its highest point. It is considered that there is no material difference therefore to 33 Waterloo Street in comparison to the previous factory building, although it could be argued that there would be an overall improvement to residential amenity in the

surrounding area by way of the removal of this employment site which has long been vacant and provision of well-designed residential properties.

- 6.26 In the Inspector's decision it was noted that the refused *apartment building would be significantly greater than its predecessor on the corner of Waterloo and Barngate Street*. The Inspector went on to conclude:

"In its proposed location, this high building would have an overbearing effect on the living conditions at 33 Waterloo Street and the large and extensive upper floor windows, which would look down on this property, would have a particularly intimidating effect on its residents."

- 6.27 It is asserted that the now proposed apartment block is a significant reduction in height from the previous proposal (at least 4m lower) and would provide an acceptable level of amenity to 33 Waterloo Street. The first floor windows would in no way *look down on* 33 Waterloo Street. The now proposed scheme respects and strongly reflects the roofline of surrounding buildings, offering an appropriate level of amenity.

Impact of the Listed Building

- 6.28 As reiterated throughout this statement, the Inspector concluded that the proposed appearance and design of the scheme was acceptable and appropriate in the context of the local area and the listed building. However concerns were raised regarding the scale and height of the proposed apartment building and the resultant impact on the listed building and views and vistas of it within the local area.
- 6.29 The revised scheme herein seeks a significant reduction in the height of the apartment building from three to two storeys; in addition the roof design has been altered to comprise a parapet roof. Both of these amendments when combined significantly reduce the height of the building and greatly increase views and vistas of the Listed Building in the local area, specifically along Barngate Street and James Street.
- 6.30 The now proposed parapet design roof was discussed at the pre-application meeting with Chris Johnson on 30th May 2014 and was a preferred design of the LPA. The parapet roof is also reflective of the roof of Waterloo Mill, seeking to strengthen and enhance the character of the area by reflecting and respecting the listed building.

Impact on Highways

- 6.31 The proposed scheme seeks to maintain the same number of parking spaces previously proposed, i.e. 27no. spaces allocated as follows: 20no. spaces for the proposed 20no. houses, 5no. spaces for the proposed 12no. assisted living apartments (including 2no. disability spaces) and 2no. visitor spaces.
- 6.32 The proposed level of parking was considered acceptable by the Highway Authority; however the Inspector concluded that insufficient information had been made available to effectively judge the adequacy of the car parking for the apartments.

- 6.33 This resubmission application is accompanied by a Technical Note produced by SCP Transport which includes, at its Appendix 3, a letter from Choices Housing Association (those who would be responsible for the assisted living apartments). This letter explains the role of Choices and how the assisted living apartments would be occupied and managed. Specifically the letter provides additional information with regard to their experience elsewhere with assisted living schemes and the parking requirements of tenants. Essentially this confirms that residents of the apartments are highly unlikely to own their own vehicle; the likelihood is therefore that the five spaces allocated for the apartments would only be used by those visiting the residents.
- 6.34 Furthermore, the letter confirms that in terms of visits by carers and key workers, as the apartments would mean that there are a number of services users (i.e. tenants) on one site Choices would be able to resource staff more effectively by a carer being allocated to a number of tenants so that one visit to the site will result in a number of tenants being attended to on one occasion.
- 6.35 It is therefore, again submitted that the proposed level of parking is appropriate for the proposed use of the apartments. Based on the experience of Choices elsewhere the proposed level of parking is more than sufficient for residents' purposes and for visitors/carers. The fact that there would be a number of residents on one site would mean that Choices are able to assign a smaller number of carers and key workers to the site to attend to all of the residents, therefore fewer numbers of visits. All visits where possible would be combined to allow maximum efficiency.

7. CONCLUSIONS

- 7.1 This planning statement has been prepared to accompany a resubmission application for the redevelopment of the Former Slimma Fashions Factory site for the erection of 20no. houses and 12no. assisted living apartments, which were the subject of a refusal by the LPA and subsequent split appeal decision. The appeal decision allowed the proposed 20no. dwellings but refused the 12no. assisted living apartments. This resubmission application is made on behalf of the applicant Renew Land Developments Limited and The Wrekin Housing Trust.
- 7.2 The principle of residential redevelopment therefore has been secured on the site and the only issue to be considered in this resubmission is the proposed 12no. assisted living apartments, including whether the revisions to the scheme have addressed the Inspector's reasons for dismissing this element of the appeal scheme.
- 7.3 The appeal decision confirms that the site is from an environmental perspective, very sustainable. The Inspector also concluded that significant weight should be attributed to the social sustainability of the site in providing 100% affordable housing to a good standard in the context of an overall poor delivery.
- 7.4 This statement and the revised design directly respond to the concerns of the Inspector and address the reasons for dismissal of the apartment element of the scheme. It is concluded that there would be no harm as a result of the proposal which would significantly or

demonstrably outweigh the presumption in favour of sustainable development and the significant benefits that the scheme would bring about including the provision of 100% affordable housing in this sustainable, previously developed location.

- 7.5 It is concluded that the proposal complies with the development plan and all other material considerations, including the NPPF, and that therefore in accordance with S38(6) of the Act, there is a presumption in favour of the grant of planning permission.

Knights

June 2014