



Appeal Decision

Site visit made on 9 February 2024

by L N Hughes BA (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 19 February 2024

Appeal Ref: APP/R3515/W/23/3323300

Land at 37 and 39 Cromer Road, Ipswich IP1 5ER

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Turley against the decision of Ipswich Borough Council.
 - The application Ref IP/22/00971/FUL, dated 18 November 2022, was refused by notice dated 3 March 2023.
 - The development proposed is the erection of two dwellings.
-

Decision

1. The appeal is dismissed.

Preliminary Matters

2. The National Planning Policy Framework ('the Framework') was revised in December 2023. Insofar as it is relevant, the content of the Framework has not been materially altered in respect of the main issues before me, and therefore it was not necessary to go back to the parties in this regard.

Main Issues

3. The main issues are the effect of the proposed development on:
 - highway safety and congestion, with particular regard to parking provision; and
 - the character and appearance of the area, with particular regard to the effect of parked vehicles and the amendments to the site frontage.

Reasons

Parking Provision

4. The site comprises semi-detached dwellings at Nos. 37 and 39 Cromer Road. The proposal would use their side driveways and part of their rear gardens to create 2 new dwellings, one attached and one detached. Parking would be on-street and unrestricted.
5. Policy DM22 of the Ipswich Local Plan Core Strategy and Policies Development Plan Document Review (CSP) (2022) requires new development to have regard to adopted car parking guidance, and expects parking to be integrated into scheme design to provide secure and convenient facilities and create an attractive environment. The CSP Policy DM17 similarly requires small scale infill development to meet the Council's parking standards, and to not lead to an unacceptable loss of parking serving existing dwellings.

6. The Suffolk Guidance for Parking Technical Guidance ('the Guidance') (2019) requires a minimum of 2 car parking spaces per 2 or 3 bedroom dwelling, plus 0.25 spaces visitor parking per dwelling. The donor dwellings have 2 bedrooms and 3 bedrooms, and the new dwellings would have 2 bedrooms, overall requiring a minimum of 8 spaces plus visitor parking.
7. The development plan and the Framework seek to promote sustainable forms of transport. The appellant suggests trends of reduced commuting and an increased cost of living have resulted in lower car ownership. However, parking standards are necessarily based on average ownership. The Guidance advises that people are not effectively discouraged from car ownership by reduced parking at their dwelling unless it is heavily restricted, and alternative modes are available.
8. It also states that a reduction in the parking requirement may be considered with robust and agreed highway mitigation, however, none would be provided. Other than cycle parking as required by the development plan, nothing specific has been identified to increase the proposal's travel sustainability. As such, I am not persuaded that providing limited parking spaces would increase the sustainability of the appeal site by encouraging alternative modes of transport.
9. A recent dwelling approval at 374 Bramford Road (Reference 23/00088/FUL) provided 1 less parking space than the Guidance requires, and is within walking distance from the appeal site and a similar distance from Ipswich centre. However, it does not set a strong precedent in support, being a different context. Crucially, its 3 spaces for 2 dwellings were off-street, compared to none at the appeal site for 4 dwellings. My visit also identified the majority of Bramford Road properties have off-street spaces, indicating less parking stress than for Cromer Road. No. 374 is also much closer to a large supermarket.
10. The Guidance does refer to potential reduced parking standards in main urban areas, but its definition of such includes where there are on-street parking controls at all times, unlike Cromer Road. Furthermore, the site is a significant distance outside of the IP-One Area identified by the CSP Policy DM22. This is identified as having no minimum parking requirement due to its frequent and extensive public transport networks, and easy access to a wide range of facilities. The appeal site is relatively sustainably located due to nearby facilities and a bus route. However, it is not so remarkable in this regard so as to outweigh this policy demarcation between the IP-One Area and the suburbs.
11. In summary on this matter, contrary to the appellant I therefore find it appropriate to use the Guidance requirement for 8 parking spaces plus visitor parking as the basis of assessing the proposal. The site currently allows for one on-street space between the dropped kerbs, and 4 off-street spaces. The Guidance requires on-street spaces to be 6m, allowing for 3 on-street following the kerb raising. This would result in an overall loss, and no off-street provision, for 2 additional houses. I find this a significant under-provision.
12. The appellant's photographs across various times and days show some parking available. Interested parties claim contradictorily that there is parking stress and congestion, and that there are no particular parking or congestion issues, with Cromer Road being better or no worse than in other streets. My early afternoon site visit identified reasonable parking availability, although much less so nearer to the appeal site. It included some cars parked partly on the pavements, and some blocking driveway dropped kerbs. The surrounding

streets displayed similar characteristics. The lack of double yellow lines or permits does not indicate that there are no parking issues.

13. The Council carried out evening surveys in March 2022 and January 2023, identifying generally limited on-street parking available, and some parking on kerbs. Only 7 spaces available along the whole length of Cromer Road indicates to me a high parking pressure. The appellant confirms that on-street parking is limited in many surrounding streets in the late evening. Cromer Road directly alongside the appeal site is particularly so due to the restriction near to the junction, and its narrower width only allowing for parking along one side. I note that some occupants park on the street rather than using their off-street space. However, to me this further suggests that the desire for convenience or the presence of multiple vehicles per dwelling adds to the parking stress.
14. Moreover, although on-street parking is generally accepted as not always being available immediately in front of specific dwellings, it would be unreasonable to expect occupiers to have to park a significant distance away or on an adjacent street. That some future potential occupiers may be willing to do so, does not persuade me otherwise.
15. Although each visit is only a snapshot, the evidence cumulatively indicates competition for on-street spaces at certain periods. Furthermore, the narrower remaining carriageway available alongside the appeal site requires drivers to informally queue and give way. Although the appellant's photos indicate there to be available passing spaces, additional parked vehicles at peak times would exacerbate this, and likely cause congestion on this frequently used road. Although the Highway Authority did not object, the Local Planning Authority is not required to conclude similarly.
16. Overall therefore, I find the proposed development would result in harm to highway safety and congestion, with particular regard to insufficient parking provision. It would thus conflict with the CSP Policies DM17 and DM22, and the Parking Technical Guidance, and I give this substantial weight.

Character and Appearance

17. The wider residential area comprises a generally linear layout of long predominantly early nineteenth century terraces, forming grids between principal roads. The proposed dwellings would broadly replicate the size, style, and building line of those neighbouring on Cromer Road. As such, they would not appear cramped on the infill plots, and would blend well with the streetscene.
18. Not having been built for car ownership, the streets are defined predominantly with on-street parking, diluting their historic character and detracting from an appreciation of their built form. The Council considers that the increase in parked cars from the appeal proposal would further erode the character and appearance of Cromer Road. I find it a finely balanced judgement as to whether this additional parking would be such a tipping point. The established impression would remain as that of a street dominated by parked cars. In comparison to its overall length, and the extensive existing property frontage amendments made to allow for off-street spaces, I find additional parked cars would be unlikely to be especially noticeable.

19. Furthermore, the reinstatement of the appeal site's low level brick walls and front gardens would also be a positive contribution to the street's character. I find this a benefit to be balanced against the increase in parked cars.
20. Overall, the proposal would not cause undue harm to the character and appearance of the area, with particular regard to the effect of parked vehicles and the amendments to the front gardens. It would comply with the relevant aspects of the CSP Policies DM17 and DM22, which together and amongst other matters, require development to protect the setting of existing buildings and the character of the area, and for car parking to not dominate the streetscene.

Other Matters

21. The Framework seeks to significantly boost the supply of homes, with paragraphs 123 and 124 providing support for the development of windfall sites, the effective use of land, and the use of suitable brownfield land. Additional housing in this location is therefore a benefit of the proposal, although 2 dwellings would only be a small-scale contribution to the housing supply. Although referenced as affordable in relation to size, there is no indication to suggest that they would not be market housing. There would also be small social and economic benefits from construction, and from the local expenditure and demand for services by the additional residents. These benefits would be modest overall, and I give them minor weight.
22. A biodiversity benefit from the new front gardens is suggested, but No. 37 is already vegetated, and there would also be other vegetation loss. In the absence of more detailed evidence, I find this to be only a very minor benefit. I have already taken into account above the physical benefit of the frontage improvements. Overall, the combined benefits would not outweigh the harm.
23. The site lies within a Zone of Influence of the Stour and Orwell Special Protection Area, afforded protection under the Conservation of Habitats and Species Regulations 2017 as amended (the Habitat Regulations). Permission may only be granted after having ascertained that the proposed development would not affect the integrity of these protected sites. There is a likely significant in-combination effect on this site resulting from increased recreational visitor pressure from new residential development.
24. The Council has identified appropriate mitigation to be a contribution towards the Suffolk Coast Recreational Disturbance and Mitigation Strategy (2020). However, I have identified above that I am dismissing the appeal on other grounds. I therefore do not need to consider further the implications of the Habitats Regulations, whether such a contribution would adequately mitigate the proposal's effect on the integrity of the protected site, or whether it has been suitably guaranteed.

Conclusion

25. The proposal conflicts with the development plan as a whole. With no other material considerations outweighing this conflict, for the reasons given above I conclude that the appeal is dismissed.

L N Hughes

INSPECTOR