



Appeal Decision

Site visit made on 17 June 2025

by **S Lo LLB M.SRA**

an Inspector appointed by the Secretary of State

Decision date: 31 July 2025

Appeal Ref: APP/W5780/W/24/3356002

35 Coventry Road, Redbridge, Ilford IG1 4QR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr & Mrs Claire against the decision of the Council of the London Borough of Redbridge.
 - The application Ref is 1463/24.
 - The development proposed is described as conversion of single occupancy dwellinghouse into 3 individual flats including part single, part two storey rear extension; loft conversion with front, rear and side dormers; hip to gable roof alterations; alterations to fenestrations; sub-division of house to create 3x two- bedroom self-contained flats with associated cycle and refuse storage.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The description of development provided above is taken from the application form. I note, however, that the appellant has entered a slightly different description onto the appeal form. Nonetheless, the two are sufficiently similar that I have dealt with the appeal based on the description set out above.

Main Issues

3. The main issues are:
 - the effect of the development upon the supply of family housing in the borough;
 - the effect of the proposal upon the character and appearance of the surrounding area;
 - the effect of the development on the living conditions of neighbouring occupiers, with regard to outlook;
 - whether or not the development would provide suitable living conditions for future occupiers, with regard to private amenity space; and
 - whether or not the proposal would make adequate provision for mitigating any impact to the Epping Forest Special Area of Conservation

Reasons

Supply of family housing

4. The appeal site comprises a semi-detached, two-storey residential dwelling with a basement, loft room, and a rear outrigger. While there are several converted hotels

along the street, it remains a predominantly residential area, which is characterised by properties that are typically suitable for family occupation.

5. Policy LP5 of the Redbridge Local Plan (2018) (the 'LP') seeks to secure a balanced housing supply by encouraging a mix of dwelling sizes and tenures, with a particular focus on the provision of larger family sized homes (three bed or more). While the policy acknowledges that not all sites will be capable of delivering the preferred mix, it states that the proposed housing mix will be assessed in relation to the site's size, surrounding context and character, the level of affordable housing, and the financial viability of the scheme.
6. Although the proposed development would contribute additional housing and diversify the local housing mix, it would also result in the loss of a three-bedroom dwelling. No clear evidence has been provided to demonstrate that this loss would be offset by new housing of equivalent floorspace. Given the size, layout, and location of the existing property, it is well-suited to use as family occupation. There is no substantive evidence before me to suggest that it could not continue to serve this purpose, nor that there is an overriding demand for flats of the type and size proposed. While residential flats do play an important role in meeting the needs of specific groups, the proposal would lead to a net reduction in family-sized housing, which the Council has identified as being in significant demand. Indeed, the Council's Strategic Housing Market Assessment (2023 Update) identifies a significant need for larger homes in the area, indicating that 76% of households across all tenures require homes with three bedrooms or more.
7. Policy LP6 of the LP supports the conversion of larger homes into smaller self-contained units, provided that the criteria (a-f) are met. In relation to criterion (a), the appeal site is within a short distance of the Ilford Metropolitan Town Centre. However, it is not located within a Metropolitan, District, or Local Centre. As such, it does not comply with the locational requirement intended to ensure that such conversions are appropriately sited in areas with good access to services and public transport. Regarding criterion (b), the extended area of the property is approximately 291 sq.m, which exceeds the minimum threshold of 180 sq.m for proposals involving three or more units. This requirement is therefore met. Criterion (c), which relates to the impact on character and amenity, is addressed later in this decision.
8. In respect of criterion (d), the proposal fails to provide car and cycle parking in accordance with the standards set out in the London Plan 2021 (the 'TLP'). This shortfall is likely to place additional pressure on on-street parking and fails to support sustainable transport objectives. Criterion (e) is satisfied, as the proposed units would meet the nationally described space standards. However, the proposal does not comply with criterion (f), which requires that at least one of the resulting units be a larger, family-sized home (minimum 74 sq.m) located on the ground floor with direct access to a dedicated rear garden. Taken together, the proposal fails to meet several key criteria of Policy LP6. These shortcomings undermine the policy's objectives of ensuring that conversions are appropriately located, support sustainable travel, and can continue to provide family accommodation.
9. It is acknowledged that the proposed development would contribute to the local housing mix and marginally increase the number of potential occupiers, from an estimated eight to ten, across the three proposed flats. However, given the existing use of the appeal site as a single residential dwelling, the scheme would deliver

only a net gain of two units. Furthermore, there is no substantive evidence before me to demonstrate the need for the proposed development in the context of the existing mix of housing sizes, types and tenures.

10. There is no substantive evidence before me to demonstrate that the proposed development responds to a specific, identified need for small flats within the context of the existing mix of housing sizes, types, and tenures in the area. In the absence of robust evidence to demonstrate that the proposal accords with the policy requirements set out above, it has not been demonstrated that the need for the proposed development outweighs the objective of retaining larger family sized homes.
11. In conclusion, the proposed development would have an adverse effect on the supply of family housing in the borough. It would not focus on the provision of larger family homes, contrary to Policy LP5 of the LP. It would fail to meet the criteria for the conversion into self-contained units, contrary to Policy LP6 of the LP.
12. The Council also cites conflict with Policy LP26 of the LP. However, this policy is not determinative for this main issue as it relates to the promotion of high quality design. Moreover, I have not been drawn to any wording in these policies that relate to this main issue. Accordingly, it has not been referred to in my conclusion

Character and Appearance

13. The surrounding streetscape is predominantly made up of similarly designed semi-detached properties, forming a cohesive and well-preserved row of Victorian or Edwardian homes. These dwellings exhibit a strong uniformity in scale, form, and architectural detailing, including features such as bay windows, decorative bargeboards, iron porch canopies, and ornamental plasterwork.
14. This uniformity extends to the rear gardens, particularly along this side of Coventry Road, where plots are similar in size. Despite being put to various uses, the gardens typically exhibit low levels of built form, contributing to a spacious character and a visually balanced setting that contrasts with the denser built form of the street frontage. Notwithstanding this, the appeal site contains a small structure at the end of the garden, which appears to be in ancillary use to the main residential dwelling. While this outbuilding is indicated on the site plans, it is not otherwise detailed in the existing or proposed plans. As such, it remains unclear how the proposed development intends to address or incorporate this existing structure.
15. While a number of properties along the street, including the appeal site, appear to have already been extended to the rear, this pattern of development is not consistent across the row and does not form a uniform characteristic of the area. While a variety of rear garden arrangements are present on Park Avenue, particularly at the care home and nearby school, these do not alter the predominantly consistent size and built form of residential plots. The prevailing character remains one of modest, well-proportioned rear gardens with limited built form.
16. Although the parties disagree on the precise dimensions of the proposed extensions in terms of depth and width, the submitted plans clearly demonstrate that the development would result in a notable increase in built form to the rear of the property. The proposal includes extensions at the ground floor, first floor, and

loft levels, each varying in scale and extent. These additions would enlarge habitable spaces, including the creation of a kitchen/dining/living area for Flat 3.

17. Collectively, these alterations would result in a substantial increase in overall depth, bulk, and scale and result in a visually congested appearance, disrupting the established balance between the host building and the surrounding pattern of development. The proposed development would appear to be significantly larger than other existing extensions that were observed within the area and would contribute notably to the cumulative impact of structures on the site, particularly when considered alongside the existing outbuilding. As such, the proposed development would introduce an atypical extent of built form, undermining the prevailing balance between built and open space that characterises neighbouring plots. This would result in a cramped and overbearing appearance, at odds with the generally open and lightly developed character of rear gardens along this section of the street.
18. While public views of the garden may be limited, the proposed development would remain clearly visible from surrounding private vantage points. As the prevailing character of these gardens is one of general openness and modest development, it would be significantly and harmfully undermined by the appeal scheme.
19. In conclusion, the proposed development would have a harmful effect on the character and appearance of the surrounding area. It would not respect the local character of the area, contrary to Policy LP26 of the LP. It would not have due regard to the existing forms and proportions, contrary to Policy D3 of the TLP.

Living Conditions - Neighbouring Occupiers

20. The proposed development would significantly increase the amount of built form and would be positioned in proximity to neighbouring properties. This proximity, combined with the proposed height, scale, and massing, would result in a dominant and enclosing form in relation to neighbouring properties. Accordingly, it would severely restrict the outlook from, and create a strong sense of enclosure within, much of the rear gardens and some of the habitable rooms of the adjacent dwellings, with particular regard to 37 Coventry Road (No 37). Given the reasonably modest size of neighbouring gardens and the significant increase in built form proposed, I am not satisfied that the impact would be confined to a narrow or limited portion of the neighbouring occupiers' field of view. Instead, the development would significantly reduce the sense of spaciousness around the dwellings, resulting in a harmful loss of outlook.
21. In reaching this view, I have considered that the proposed development would not prevent neighbouring occupiers from looking into their own respective garden areas. I also acknowledge that the angles of outlook from the ground floor flat may be partially restricted due to the single-storey nature of the extensions. Nevertheless, the views from the first-floor flat remain a significant concern, particularly as many of the proposed windows serve habitable rooms.
22. In conclusion, the proposed development would have a harmful effect on the living conditions of neighbouring occupiers, with regard to outlook. It would result in an adverse impact upon the amenity of neighbouring occupiers, contrary to Policy LP26 of the LP.

Living Conditions – Future Occupiers

23. Policy LP29 1 (a) of the LP requires the provision of a minimum amount of private amenity space for flatted development. Specifically, this requirement is set at 5 sqm for 1-2 person dwellings, with an additional 1 sqm for each additional occupant. This policy explains that this is designed to ensure that new development will provide appropriate levels of external private and/or communal amenity space to meet the needs of occupants.
24. The appellant has confirmed that no private amenity space has been allocated for the potential occupiers of the first and second floor flats. Given that the upper floor flats are likely to accommodate multiple occupants and may be used as small family dwellings, the absence of dedicated private outdoor space is a significant concern. In the circumstances of this site, the lack of on-site amenity provision would result in substandard living conditions, as future occupiers would have limited opportunity for outdoor recreation, relaxation, or domestic activities such as drying clothes or gardening.
25. In response, the appellant has referred to the proximity of Valentine Park as a potential substitute for private amenity space. While the park is located a short distance from the appeal site and may offer general recreational opportunities, it cannot be considered a suitable replacement for private amenity space. Public parks do not provide the privacy, convenience, or flexibility required for outdoor domestic activities, nor do they allow for the use of domestic paraphernalia. Consequently, the proximity of Valentine Park does not mitigate the deficiency in the provision of private amenity space.
26. In conclusion, the proposed development would not provide suitable living conditions of the future occupiers, because of the deficiency with regard to private amenity space. It would not meet the needs of occupants, contrary to Policy LP29 of the LP.

Epping Forest Special Area of Conservation

27. The appeal site is located within the 6.2 kilometre zone of influence of the Epping Forest Special Area of Conservation (SAC), which is important for its value in respect of beech trees and wet and dry heaths and for its population of stag beetle. It is likely that additional residents within this zone of influence, including from the increased units and related intensification of use on the appeal site, would place further recreational pressure of the SAC and harm its integrity.
28. Consequently, Natural England has provided advice that any scheme for new residential development within this zone is required to provide suitable mitigation to ensure that no adverse effects arise on the integrity of the SAC. The necessary mitigation measures include contributions to both the Strategic Access Management and Monitoring and Suitable Alternative Natural Greenspace.
29. These contributions are expected to be secured through a s106 agreement, by way of a financial contributions paid prior to commencement of the development, to ensure that the proposal would not, either alone or in combination with other projects, be likely to have a significant and adverse effect on the integrity of this habitat site.

30. In this case, the appellant has indicated a willingness to make arrangements to secure and sign the necessary legal agreement. However, I do not have a completed agreement before me as part of this appeal. It follows that I am unable to conclude that the proposal, either alone or in combination with other schemes, would not have a likely significant and adverse effect on the integrity of the SAC.
31. Consequently, I conclude that the proposal would not meet with these legislative requirements of the Conservation of Habitats and Species Regulations 2017. The scheme would therefore also be in conflict with Policy LP39 of the LP which seeks to ensure that development does not adversely affect the SAC, except for reasons of overriding public interest, and only where adequate compensatory measures are provided.

Other Matters

32. The appellant has referred to a development at 33 Coventry Road, referenced under application 3651/21, described as the 'Use of building as 8 self-contained flats'. However, this was not a planning application, but a Certificate of Lawfulness application for an existing use. Consequently, it was assessed on the basis of evidence demonstrating that the use had already occurred for a sufficient period of time to be considered lawful, rather than on its planning merits. As such, the circumstances of that development are not directly comparable to the proposed development. Accordingly, I am unable to conclude that this other development provides a meaningful precedent in support of the proposed development.

Planning Balance

33. As noted above, there is harm and policy conflict arising from the loss of family accommodation, adverse impact on the character and appearance of the area, adverse effect on the living conditions of adjoining residents, the scheme would not provide future occupants with suitable living conditions and proposal would not mitigate the likely harm to the SAC. These are very significant shortcomings with the scheme and result in conflict with the development plan as a whole. Collectively these harms and policy conflicts should be attributed substantial weight against the scheme.
34. Conversely, the Council acknowledges a shortfall in housing delivery. Based on 2019 to 2022 performance, the indicate figures report that only 1438 dwellings were delivered against a target delivery of 2899 dwellings. This equates to approximately 50% of the required housing target over this monitoring period. Although the 2023 Housing Delivery Test results have not yet been published, the Council considers it likely that there will be no material change in its housing delivery position. This constitutes a very significant level of under delivery. As such, the Council recognise that they are unable to demonstrate a five-year housing land supply in accordance with the National Planning Policy Framework (the Framework).
35. However, the presumption in favour of sustainable development in accordance with paragraph 11d of the Framework is not engaged, because the harm to the SAC provides a strong reason for refusing the development. This is the case because footnote 7 of the Framework includes habitat sites, and paragraph 194 of the Framework states that SACs are afforded the same level of protection as habitat sites. Furthermore, paragraph 195 of the Framework confirms that the presumption does not apply where a plan or project is likely to have a significant effect on a

habitats site. As a result, the proposal should be assessed against the normal planning balance.

36. Taking into account the very significant level of under delivery and the Council's inability to demonstrate a Framework compliant supply of housing land, it is recognised that the scheme would provide a worthwhile boost to housing supply. Additionally, there would be social and economic benefits to the local economy, both during construction and through subsequent occupation. The additional dwellings would be provided on an existing site within the a built up area, in a location that offers good access to local services and facilities via sustainable transport options. However, as only two additional units of accommodation would be provided, I consider that the benefits should be attributed limited weight in favour of approval.
37. In conclusion, the harm and related policy conflicts, which are attributed substantial weight, would not be outweighed by the benefits of the scheme are afforded limited weight.

Conclusion

38. The proposal conflicts with the development plan taken as a whole and material considerations do not indicate that the appeal should be determined other than in accordance with it. Therefore, for the reasons set out above, I conclude that the appeal should be dismissed.

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INSPECTOR