

ET Planning

Planning, Design and Access Statement

Client:

Mr and Mrs Kinsman

23a Hampton Road

Teddington, TW11 0JN

Demolition of existing bungalow and the erection of a three-storey replacement dwelling with basement level

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1. Introduction

- 1.1 This statement is produced to support a planning application for a replacement dwelling with basement at 23A Hampton Road, Teddington TW11 0JN.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents prepared by Fletcher Crane Architects, Geosmart, MES Building Solutions, MEF Construction Services, Dryad, Pentrevion Fire, Heritage Fusion and Wynchwood:
 - Location Plan – TP(00)01
 - Existing + Proposed Block Plan – TP(00)02
 - Existing Site Plan (topographic + trees) – TP(00)03
 - Proposed Site Plans – TP(00)04
 - Existing Ground Floor Plan – TP(10)00
 - Existing First Floor Plan – TP(10)01
 - Existing Roof Plan – TP(10)02
 - Proposed Basement Plan – TP(10)20
 - Proposed Ground Floor Plan – TP(10)21

- Proposed First Floor Plan – TP(10)22
- Proposed Second Floor Plan – TP(10)23
- Proposed Roof Plan – TP(10)24
- Existing Elevations (north and east)– TP(11)01
- Existing Elevations (south and west)– TP(11)02
- Proposed Front Elevation (north) – TP(11)21
- Proposed Side Elevation (east) – TP(11)22
- Proposed Rear Elevation (south) – TP(11)23
- Proposed Side Elevation (west) – TP(11)24
- Proposed Street Elevation – TP(11)25
- Proposed Section 01 – TP(12)21
- 230830 2306 Hampton Road DAS
- Arboricultural Impact Assessment D3023 (Dryad)
- 2056 Heritage Statement Rev. 1 (Heritage Fusion)
- Energy Statement – 23a Hampton Road v1.1 (Energy, Carbon – MES)
- Construction Management (MEF Construction Services)
- Sustainable Drainage Assessment 79658.01R1 (Geosmart)
- Subterranean Construction Method Statement [Croft Structural + Civil]
- Preliminary Ecological Appraisal (Wynchwood Consultants)

- Planning Fire Safety Strategy D12 (Pentrevion)
- 1.4 The relevant application fee of £462 will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 23A Hampton Road is a single storey dwelling with habitable roof space, within the built-up area of Teddington on the southern side of Hampton Road. The surrounding area comprises a mix of residential, commercial and community uses.
- 2.2 The site is adjacent to 23 Hampton Road to the east- a part two, part three storey building of townscape merit housing 9 flats. Beyond this is Coleshill Road, which is residential. To the west are coach houses to Teddington Hall, a care home, with Teddington Hall, a Grade II Listed Building, to the south-west.
- 2.3 On the opposite side of the road, the immediate area is a mix of two and three storey dwellings as well as three storey flatted development.

3. Planning History

- 3.1 The existing dwelling was granted planning permission in 1957.
- 3.2 Application **17/3078/FUL** was submitted in August 2017 for “*demolition of existing bungalow and erection of 2 x 2 storey 4 bedroom semi-detached houses with basement and associated hard and soft landscaping, parking, cycle and refuse stores*”. This was refused in 2018 on grounds of: parking; lack of detail on basement; mass, bulk, height design and siting resulting in an unneighbourly

and overbearing development; loss of existing housing; impact on adjoining building of townscape merit and adjoining Grade II Listed Building; and the absence of a legal agreement regarding affordable housing contributions.

- 3.3 Application **16/3736/FUL** was submitted in September 2016 for "*Demolition of existing building, rear garages and front boundary. Erection of four-storey building with basement level, to provide 7 residential units together with car parking (2 spaces), cycle storage, roof terraces/balconies, and communal gardens*". This was refused for largely the same reasons as the proposal above.
- 3.4 Extensive work has been undertaken during the design process to ensure that the current proposal has addressed the concerns raised in the refusals of the previous applications. This is detailed in the Design and Access Statement prepared by Fletcher Crane Architects, submitted with this application.

4. Development Proposals

- 4.1 The proposal seeks to demolish the existing bungalow on the site and erect a replacement three storey dwelling with a basement. The proposed dwelling would be part single, part two and part three storey dwelling.
- 4.2 The proposed dwelling will be set back from the street and comprises a contemporary interpretation of surrounding architectural styles and built forms. More technical detail and visual examples can be found within the Design and Access Statement.
- Basement Level will comprise a gym, cinema room, store, office, bathroom and sauna area.

- Ground Floor level, there will be an entrance hall leading to a living room; a cloakroom; and an open plan kitchen/dining/living space.
 - First floor level will accommodate three bedrooms and a bathroom, with a green roof to the front over the ground floor.
 - Second floor comprises a master suite served by roof lights with a balcony and a further green roof. A lift runs through the core of the building.
- 4.3 The proposed dwelling will be set behind the build line of 23 Hampton Road. Pedestrian access will be taken from the dwelling's frontage on Hampton Road, with car access from Colehill Road, as per the existing arrangements.
- 4.4 The site will be landscaped to the frontage with the basement rooflights integrated into the landscaped areas. There will be a patio to the rear, accessed off the dining/living area with a lightwell between the kitchen area from and patio at ground floor. Additionally, cycle and bin stores will be provided to the rear of the site.

5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 38 of the NPPF states that "Local planning authorities should approach decision on proposed development in a positive and creative way" and "at every level should seek to approve applications for sustainable development where possible". Paragraph 119 of the

NPPF comments that planning should “make effective use of land” in “meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions”.

- 5.3 Paragraph 60 confirms the Government’s objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.
- 5.4 Paragraph 126 identifies that “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”, whilst paragraph 134 states that significant weight should be given to “outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”
- 5.5 The National Design Guide builds on the above, and clarifies that “well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use” (para 109).
- 5.6 The NPPF, at paragraph 194, sets out that “*in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on their significance*”.

- 5.7 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The site is within the built up area of Teddington, within settlement to which development is directed.
- 5.8 **Policy LP 38** of the local plan states that existing housing should be retained, and that redevelopment of existing housing should normally only take place where:
- a) it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and if this is the case*
 - b) the proposal does not have an adverse impact on local character; and*
 - c) the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35.*
- 5.9 As discussed in further detail below, the existing building represents an anomaly in the street scene and the proposed dwelling is more suitable from both a character and heritage point of view and could not be achieved through the retention of the existing dwelling. The enhancement of the adjacent heritage asset through the proposal should be given significant weight, with both National and Local support.
- 5.10** Furthermore, the accompanying Carbon Lifecycle Report sets out that the new dwelling would be energy efficient and therefore an equivalent scheme to the same sustainability standard could not be achieved through the improvement or conversion of the existing dwelling. The sustainability of the proposal and the enhancement of

the heritage assets both represent material planning considerations which should be afforded considerable weight, satisfying criteria (a) of **Policy LP 38**.

- 5.11 The high quality of the design of the proposal represents an improvement to the street scene and the character of the area and this is expanded upon below and detailed within the Design and Access Statement prepared by Fletcher Crane.
- 5.12 In addition, as detailed within the documents, the proposal provides a high standard of accommodation, including accessible design through level access at ground floor level and an internal lift to all floors.
- 5.13 The proposal therefore meets the requirements of **Policy LP 38** and the loss of the existing dwelling and its replacement with a high quality, sustainable family dwelling is deemed acceptable in principle.
- 5.14 **Character and Appearance of the Area:** London Plan **Policy D3** requires development to make the most efficient use of land by following a design-led approach that optimises the capacity of sites. The policy explains that "*optimising site capacity means ensuring that development is of the most appropriate form and land use for the site*". The general principle of replacing the existing bungalow with a 3-storey dwelling, meets these aspirations by providing a larger residential dwelling on an existing residential site. Therefore, maximising the space on site.
- 5.15 **Policy D3** of the London Plan also requires development to be of a high quality of design, responding to the established character of an area, including its valued features and characteristics and to enhance heritage assets. This is supported in Richmond's Local Plan **Policies LP 1** and **LP 2**, which focus on local character and design quality and building heights.

- 5.16 **Policy LP1** is concerned with design quality, requiring all development to be of high architectural and urban design quality and to be compatible with the local character. As set out in the Design and Access Statement prepared by Fletcher Crane Architects, the proposal has been sensitively designed to mediate between 23 and 25 Hampton Road. This is intuitively executed, through stepping down the height and mass and being set back from the street. The roofscape reflects, mediates and forges a relationship with the neighbouring properties in a contemporary and relevant manner.
- 5.17 The proposed dwelling would also draw on the traditional materials seen in the locality, including brick, mortar and standing seam metal, as well as patterned brickwork. The proposal will blend with the proportions and forms of the buildings in the locality. The height, mass and form of the building as well as separation between neighbouring buildings have been considered to as to retain the prominence of the Building of Townscape Merit, while providing a distinctive, high quality home.
- 5.18 As reinforced within the Design & Access statement and the Heritage statement, the surrounding area is comprised of variety of dwellings from different periods and thus, there are more historic structures and contemporary structures interspersed together. This sets a precedent for the modern aesthetic of the proposed dwelling and the the building will relate effectively to prevailing architectural types, whilst drawing inspiration from local materials and detailing.
- 5.19 **Policy LP 2** refers to building heights and sets out new buildings, including redeveloped buildings, should generally reflect the prevailing building heights within the vicinity.
- 5.20 The site is immediately adjacent to a part two, part three storey building at 23 Hampton Road and directly opposite buildings of 2-3

storeys. However, the existing dwelling is a bungalow, which is incongruous with the prevailing residential building heights and established roofscape; typical of the large villas in the immediate area. The proposed replacement dwelling would be in keeping with the building heights in the area and enhance the street scene through better reflecting its character.

- 5.21 Regarding its spatial relationship to 23 Hampton Road (the Building of Townscape Merit), the proposed dwelling would step down, providing a visible transition between this and the single storey dwelling at 25 Hampton Road; with a single storey closest to the boundary with 25 Hampton Road.
- 5.22 On balance, the existing bungalow reads as an anomaly in the streetscene and the proposed high-quality dwelling represents a significant improvement to this, in line with the aspirations of national, London Plan and local policy. Further detailed information on the design evolution and resultant design of the proposals can be found within the Design and Access Statement.
- 5.23 **Heritage:** Sections 16 (2) and 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 state that in regard to applications and decisions relating to Listed Buildings, the Local Planning Authority (or Secretary of State) “*shall have special regard to the desirability of preserving the building or the setting of any features of special architectural or historic interest which it possesses*”.
- 5.24 The National Planning Policy Framework (NPPF) defines these assets as irreplaceable resources (Paragraph 189). Paragraph 194 of the NPPF requires applicants to describe the significance of any heritage assets, with the level of detail proportionate to the importance of the

asset, and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 5.25 Paragraph 199 advises that great weight should be attributed to the **conservation of a heritage asset**, with the weight applied varying, depending on the importance of the asset. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. 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 (Paragraph 201)
- 5.26 The Planning Practice Guidance (2014) provides further clarity regarding the important significance, stating that *“heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals”*.
- 5.27 London Plan **Policy HC1** seeks to conserve the significance of heritage assets through development proposals being sympathetic to their significance and appreciation within their surroundings.
- 5.28 Local Plan **Policy LP 3** seeks to preserve designated heritage assets (Grade II Listed Building, in this case) and their settings. It is highlighted that development proposals that are likely to *“adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal”*.
- 5.29 **Policy LP 4** seeks to preserve and enhance the significance, character and settings of *non-designated heritage assets* such as the

Building of Townscape Merit. It states that high quality architecture should seek to enhance and preserve non-designated heritage assets.

- 5.30 No. 23 Hampton Road, the neighbouring the site to the east, is a Building of Townscape Merit. Further to this, to the west is Teddington Hall, a Grade II Listed Building. Therefore, the former is classed as a building of local significance, whereas the latter is a statutory heritage asset. In this instance, both **Policy LP 3** and **LP 4** are of direct relevance.
- 5.31 As observed within the accompanying statement from Heritage Fusion, the immediate street scene displays a diverse range of architectural styles, with buildings that span across various eras. This array of development provides compelling evidence in favour of the more contemporary design proposed, which integrates effectively with this mixture.
- 5.32 Firstly, it is assessed within the report that the existing bungalow in fact, **detracts** from the vibrant display within the immediate Teddington estate and is of "*poor visual aesthetic and is detrimental to the overall street scene*". It's low build quality consolidates that it **does not** contribute to the setting of the heritage asset at Teddington Hall.
- 5.33 To contrast, it is reiterated that the scale and massing of "*the proposed dwelling is proportional to the surrounding streetscape without competing visually with adjacent BTMs*". The Building of Townscape Merit at No. 23 reaches a maximum ridge height of 11.6m, with No. 23a set further down at 9.3m and No. 25 at 7.8m. This staggering of heights is more visually pleasing and as stated above clearly shows the subordinacy of the proposal to the neighbouring Building of Townscape Merit.

- 5.34 Therefore, with this and the above considered, the development will comply with London Plan **Policy HC1** as well as local plan **Policy LP 3** and **LP 4**, improving the setting of both the Listed Building **and** the Building of Townscape Merit.
- 5.35 Further to this, there are no vantage points from Bushy Park that provide clear views of the building, therefore, it has no impact on this particular historic setting.
- 5.36 The existing bungalow is therefore deemed more incongruous with the large villas characteristic of the street and the proposed dwelling instead will maintain this consistency of scale and proportion, whilst ensuring it does not create an 'imposing' presence.
- 5.37 Overall, the report concludes that the single-storey, small stature of the existing bungalow is in fact '*alien*' when viewed alongside the surrounding properties and specifically, is detrimental to the setting of heritage asset Teddington Hall. This alternative proposal replaces it with a "*high quality residential building of a greater massing it reinforces the adjacent heritage setting and visually enhances the wider street scene*". Thus, the proposal is fully compliant with the aims of the enclosed sections of the NPPF and **Policy LP 3 and Policy LP 4**.
- 5.38 **Residential Amenity – Internal Space: Policy LP 35** of the Local Plan relates to housing standards and requires all new housing to meet the Nationally Described Space Standards, which are the same as the Space Standards set out in Table 3.1 of the London Plan.

5.39 London Plan **Policy D6** and local plan **Policy LP 35** also require amenity space to be provided. The below table illustrates the national and local space standards compared with the proposed development.

RESIDENTIAL DEVELOPMENT STANDARDS

The proposed room sizes are as follows:

ROOM	NATIONAL/LOCAL STANDARD (m2)	PROPOSAL (m2)	ADDITIONAL NOTES
Mix		4B8P	
Overall GIA	130	340.9	<i>Exceeds, including storage provisions</i>
Living Room		24.9	<i>Acceptable size</i>
Utility/Larder		7.7	<i>Acceptable size</i>
WC		2.1	<i>Acceptable size</i>
Kitchen/Living/Dining		48	<i>Acceptable size</i>
Bedroom 1		12.1	<i>Exceeds</i>
Bedroom 2		11.8	<i>Exceeds</i>
Bedroom 3		13.4	<i>Exceeds</i>
Bedroom 4 (Mst)		17.2	<i>Exceeds</i>
Garden amenity		284.8m2 (166.4m2 to rear garden 70.4m2 to front/side 48.0m2 to driveway)	<i>Acceptable size</i>

Head height is at least 2.5m for 100% of the gross internal floor in excess of requirements and in line with the London Plan 2021. Refer to TP(12)21.

Overall, the footprint and room sizes of the proposed residential dwelling-house are adequate and would result in a good standard of accommodation.

FIG 1 – Residential Development Standards & Room Sizes prepared by Fletcher Crane Architects

5.40 This clearly demonstrates that the proposed development meets the requirements of the London Plan and **Policy LP 35** and some instances, exceeds the minimum sizes.

5.41 **Residential Amenity – External Space:** London Plan **Policy D6** and Table 3.2 require sufficient high quality amenity space for housing. As outlined in the Design and Access statement, the site has

a 'substantial rear garden that predominately faces south. This area is flanked by mature tree screening'.

5.42 The spacious rear garden equates to 166sqm, with 70sqm for the front garden and 48sqm for the driveway. This vastly exceeds the National space standard for private amenity/garden space, which is a minimum of 30sqm.

5.43 London Borough of Richmond Upon Thames's Residential Development Standards SPD (March 2010) indicates that:

"the type and size of space will vary according to the size and use of the dwelling unit. Accommodation likely to be occupied by families with young children should have direct and easy access to a good-sized private garden. The aspect, useability and sense of enclosure will all be taken into account in assessing whether the private garden provided sufficiently good living conditions."

5.44 With the above considered, the garden space provided meets the criteria of size, useability and sense of enclosure. The cumulative outdoor amenity area is significant and the rear garden is effectively screened by mature trees, creating this sense of enclosure.

5.45 **Residential Amenity – Overlooking, Loss of Light and Overbearing:** London Plan **Policy D6**, supported by Table 3.2, also requires the site layout and orientation for new dwellings to allow for privacy. **Policy LP 8** of the Local Plan required the protection of amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. This includes in terms of daylight and sunlight; overlooking; noise and disturbance; and visual amenities as well as residential development standards.

5.46 It is acknowledged, that the increase in overall size from the existing bungalow may result in a slightly heightened perception of

overlooking at 2a Coleshill Road. To offset any potential impact to amenity, design elements such as perforated brickwork on the window to bedroom 3, have been proposed. Further to this, there are metal louvres to bedroom 2, which will again, mitigate any sense of overlooking.

- 5.47 The windows on the existing dwelling, already establish a degree of overlooking onto 2a Coleshill Road. The changes that result from the proposed development, create no direct sightlines and are at oblique angle. As highlighted in the design & access statement, No.2a Coleshill sits 12.2m away when measured from the centre of the closest window (using the 45 degree rule).
- 5.48 Therefore, design mechanisms have been employed such as perforated brickwork/metalwork on the windows to the rear façade. In addition to this a layer of screening is provided by pre-existing planting which reduces visibility from further vantage points.
- 5.49 Lastly, it is accentuated that the proposed windows and habitable rooms are situated only to the front and rear elevations, therefore, the side windows proposed are not considered to have any impacts to No.23 and No.25.
- 5.50 As described in earlier sections, the proposal does not have an imposing or visually intrusive impact, through its height that is staggered in relation to the neighbouring properties.
- 5.51 Further to this, the design and layout ensures that high standards of daylight and sunlight are achieved and that the build does not result in any loss of light into the adjacent properties. The perforated brickwork is an intuitive feature that creates a natural pathway for sunlight.

- 5.52 Due to its positioning in the plot, distance from the highway and the staggering of heights, these elements ensure that there is no undue harm to neighbouring amenity to adjacent properties No.23 and No.25.
- 5.53 Overall, these factors ensure that the development does not amount to any harmful degree of overlooking, loss of light or a domineering presence on the street scene.
- 5.54 **Trees and Landscaping: Policy LP 16** seeks to protect existing trees and important existing landscape features, as well as encouraging new planting. **LP 7** requires green and/or brown roofs for major developments.
- 5.55 **Policy G7 (Trees and Woodlands)** of the London Plan, indicates that proposals should ensure where possible, existing trees of value are retained. As explored below, the arboricultural report will have no bearing on trees of **value** and has assessed the quality of the trees on site.
- 5.56 There are no known TPOs on site and it is not located within a Conservation Area. The Arboricultural report provided by Dryad Tree Specialists, demonstrated that the survey determined that 0% of the tree stock was of high quality, 0% of moderate quality and 88% of low quality and 12% of dead or dying grade.
- 5.57 Further to this, the TPO to the west of the site (illustrated on the attached plan) has been classed as 'in decline' and of the dead or dying grade.
- 5.58 Therefore, the vast majority of the trees are of low quality or of no arboricultural merit and in turn, the proposed development does not require a detailed mitigation strategy.

- 5.59 **Transport and Parking:** The London Plan, in **Policy T1**, requires the majority of trips in London to be made by foot, cycle or public transport. **Policy LP 44** similarly seeks to ensure that development is designed to maximise opportunities for walking and cycling. It also seeks to ensure that new development does not have a severe impact on the operations, safety or accessibility to the local or strategic highway networks.
- 5.60 **LP 45** refers to parking standards and requires parking to be provided to standard, which is PTAL 0-3, 3+ bedrooms = 2 spaces for PTALS 4-6 as per London Plan. As demonstrated on the proposed plans, the 2 car parking spaces for the existing dwelling will be retained. Cycle parking is required as per London Plan standards. A cycle store is provided to the rear of the dwelling as illustrated on the attached plans.
- 5.61 **Refuse Provision:** A bin store is located to the rear of the dwelling, within 34 metres of Coleshill Road. Therefore, the development will be in accordance with the London Plan and **Policy LP 24**, relating to waste collection.
- 5.62 **Drainage and SuDS: Policy LP 21** refers to flood risk and sustainable drainage. A Flood Risk Assessment and Sustainable Drainage Strategy has been produced by Geosmart, to identify any flood risk and demonstrate mitigation.
- 5.63 **Policy SI 12** (Flood Risk Management) and **Policy SI 13** (Sustainable Drainage) within the London Plan, cumulatively reflect the aims of **Policy LP 21**. They identify that flood risk should be minimised and mitigated and proposals should aim to ensure that surface water-run off is managed as close to the source as possible. The below assessment has addressed these policies effectively.

- 5.64 The attached Flood Risk Assessment indicates that the overall risk is very low to low, as the site is located within Flood Zone 1. Despite this, appropriate mitigation mechanisms are recommended within the report, that are intended to improve the longevity of the development and minimise the risks across its lifespan.
- 5.65 The proposed Sustainable Drainage strategy is comprised of a “*green roof, soakaway, rainwater harvesting butt and permeable paving to attenuate surface water runoff during the 1 in 100 plus 40% climate change event*”. Technical details are available in the accompanying report.
- 5.66 To summarise, the SuDs infiltration potential map illustrates that the site has a high potential for infiltration. However, this is effectively mitigated by the tailored SuDs strategy, with green roof, rainwater harvesting butt, permeable paving and a soakaway.
- 5.67 As explained within the statement, the proposed strategy and drainage features will ensure the development complies with. In addition to a maintenance schedule that will cover the intended lifespan of the proposed development. For further technical details, see attached report.
- 5.68 Therefore, the proposed development is in full compliance with the prescriptions of **Policy LP 21**.
- 5.69 **Noise: Policy D14** Noise ascertains that to reduce, manage and mitigate noise, development should comply with the ‘Agent of Change’ principle set out in **Policy D13**.
- 5.70 **Policy D13** states that development proposals should manage noise by ensuring good design and exploring mitigation mechanisms early on. As will be demonstrated by the accompanying energy statement and sustainability checklist, the proposed development is a low-

intensity use and doesn't amount to any additional noise generation from the existing arrangement. Therefore, it is in full compliance with **Policy D13** and **D14**.

- 5.71 **Sustainability and Energy:** Paragraph 8 of the NPPF supports the transition of development to a low carbon future.
- 5.72 The National Code for Sustainable Homes has now been abolished, however it is proposed that the development would conform to Part L of the Building Regulations which as of 2022 requires a 30% reduction than current standards. By way of contributing to the reduction in carbon, the proposal would also achieve current building construction standards with added sustainability measures through;
- 5.73 The Energy & Sustainability Statement provided by MES Building Solutions provides technical details regarding the above. This is supplemented by a 'Carbon Lifecycle Report'.
- 5.74 The preliminary section identifies that the existing dwelling is in very poor condition and lacks insulation throughout. Currently, heat loss is a serious issue, and the proposed scheme will exponentially improve on this, through inbuilt renewable and energy efficient heating systems that will ensure a highly sustainable home.
- 5.75 It is elaborated that the construction and structural integrity of the existing dwelling is compromised and therefore, not suitable for retrofitting thermal efficiency. With this considered, "*much greater thermal efficiency can be achieved in the proposed new building than by retrofitting the existing.*" Therefore, this is in favour of the development and consolidates its sustainability credentials. Further technical details are provided within the attached statement.
- 5.76 Within the Carbon Lifecycle report, it was surmised that the replacement dwelling does achieve a carbon payback across the

standard 60-year design lifespan of the building. Although, it is noted that the building will likely last significantly longer than 60 years, therefore, the carbon benefit of replacement would subsequently be significantly greater than the calculated figure for both Options (masonry and timber frame).

5.77 Overall, this demonstrates full compliance with **Policy LP 20** (Climate Change Adoption) and **Policy LP 22** (Sustainable Design and Construction).

5.78 Lastly, the Sustainable Construction Checklist indicates that the following statements are true:

- Carbon dioxide emissions reduction will be 69%, with the percentage reduction from efficiency measures 31% and finally, percentage of total site CO₂ emissions saved through renewable energy installation is 38%.
- Water conservation through the fitting efficient taps, shower heads, water efficient A or B rated appliances, water meter. Water usage limited to 105 litres per person per day.
- Biodiversity improved through an intensive green roof and significant garden space.
- Sustainable transport secured through providing opportunities for occupants to use innovative travel technologies, EV charging points and cycle storage.
- Air, noise and light pollution are mitigated through reduction strategies for dust emissions from construction and no new noise generation or transmission in its proposed use.
- Heat generation will include communal heating and cooling powered by gas or electricity.

- Cooling measures will include improving insulation and living roofs and walls, shading, passive ventilation, and mechanical ventilation with heat recovery.
- The proposal is therefore considered to comply with sustainability objectives in this respect.

5.79 **Archaeology: Policy LP 7** seeks to protect, enhance and promote is archaeological heritage. There are no known archaeological designations on site, therefore, this aspect is not considered relevant.

5.80 **Ecology: Policy LP 15** is concerned with enhancing the Borough's biodiversity, focusing on but not exclusively sites which have been designated for biodiversity and nature conservation value. The Policy sets out support for enhancements to biodiversity; and that where seeks to avoid, mitigate or compensate for impacts on a habitat.

5.81 **Policy G6** (Biodiversity and access to nature) states that local plans should support the protection and conservation of priority species and habitats, taking opportunities to sustain and enhance the integrity of the biodiversity network in that locality.

5.82 The accompanying report produced by Wynchwood Environmental Ltd, identifies the species and habitats that are present on site.

5.83 It is acknowledged that that the site is not subject to a statutory wildlife designation, but there are two statutory wildlife sites within 2km of the site's boundary. Bushy and Home Park (SSSI) is located within 0.4km south of the site. Additionally, Ham Lands Local Nature Reserve (LNR) is 1.4km to the northwest of the site.

5.84 It is concluded that no further habitat surveys or investigation are required. Specifically, the buildings are stated to have negligible potential to support roosting bats and the amenity grasslands are unlikely to support protected reptiles and amphibians.

5.85 The presence of two species has been identified as likely within the application site:

- Nesting birds
- Hedgehogs/Foxes

5.86 Precautionary measures have been listed, to be implemented throughout the course of demolition and construction works, these include:

- Toolbox talks to raise awareness prior to site clearance and during building works
- Building works to be scheduled for outside of November to March, to avoid disturbing hibernating reptiles and amphibians.
- Piles of deadwood, log piles, compost heaps, scrub and hedge should be checked manually prior to being moved.
- Hazards such as open holes, ditches and drains to be covered at night or fitted with ramps, to avoid entrapment of animals.
- Zero-litter policy on-site.

As such, these measures will seek to preserve and protect the integrity of biodiversity on site during works.

5.87 Further opportunities for biodiversity enhancement have been suggested, to ensure adherence with local and national policy and to offset any impacts. These include the native tree/shrub planting and the installation of bird boxes.

- 5.88 On balance, the appraisal concludes that in line with the recommendations, any adverse impacts can be sufficiently minimised, with clear opportunities for improving habitats.
- 5.89 Further, technical details of which can be seen within the full report. Therefore, with a mitigation strategy in place, in addition to the suggested enhancements, the scheme is in accordance with Policy **LP 15** and **Policy G6** of the London Plan.
- 5.90 **Basement: Policy LP 11** is concerned with basements and ensuring such development is carried out in a safe manner.
- 5.91 **Policy D10** of the London Plan relates to basement development and pertains that boroughs should establish tailored policies in their development plans to address potential impacts of basement development.
- 5.92 The Basement Impact Assessment has been produced by Croft Structural + Civil.
- 5.93 As per the statement, the basement will be constructed using pile walls and reinforced concrete retaining walls with concrete slabs at both basement and ground floor levels and multiple lightwells around the property.
- 5.94 To echo the Croft report, the ground movement assessment and building damage assessment indicate a maximum damage category of Category 2 "Slight" to walls of No. 23 Hampton Road. Further to this, the walls with Category 2 "Slight" damage were up to 9m away. The predictions continue that walls of the gatehouse at No.25 may also suffer Category 2 Damage. Further technical details are available within the report.
- 5.95 As per the Burland methodology, which assesses the category of damage for neighbouring structures. Category 0, 1 and 2 only applies

to aesthetic damage, which doesn't relate to serviceability and function or damage that compromises structural integrity/stability. Therefore, as stated in the report *"The main objective of design and construction is to maintain a level of risk to buildings no higher than category 2 where only aesthetic damage is considered acceptable"*

5.96 These results are accompanied by a list of mitigation measures to be adopted to minimise ground movement, such as:

- Adequate propping and support in place during construction
- Installation of the first stiff support early in the construction sequence
- Avoiding leaving ground unsupported
- Minimise deterioration of the unexcavated soil mass by the use of blinding/covering with a waterproof membrane.
- Avoiding overbreak
- In the event dewatering is required, the control and appropriate design of the process should ensure that fines removal and drawdown are minimised.

5.97 Therefore, with the above considered, any damage to neighbouring walls will be strictly aesthetic and within the acceptable level determined by the Burland Scale. Further to this, the suggested mitigation mechanisms will further ensure this is minimised during building works.

5.98 **Construction Method Statement: Policy LP 10** of the local plan is concerned with the environmental impacts of developments and requires Construction Management Statements for developments including basement developments.

- 5.99 Accordingly, a construction management plan has been submitted with the application which presents a schedule, dust, vibration and noise mitigation measures and other mandatory procedures that will be strictly complied with during building works.
- 5.100 Further to this, information regarding logistics, vehicle positioning, and swept path analysis has been included to effectively cover this element. Therefore, the scheme is in compliance with **Policy LP 10**.
- 5.101 **Affordable Housing:** Where 1 housing unit (gross) is to be provided, **Policy LP 35** requires 5% contribution towards affordable housing. Where a reduction is required on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing.
- 5.102 Accordingly, an Affordable Housing Viability Assessment has been submitted with the application. This has demonstrated that the policy compliant level of affordable housing, in this instance, is zero.
- 5.103 To directly quote from the conclusion, the development appraisal results in a deficit of -£742,053. Therefore, *“as the level of return is negative then the proposed development cannot be development cannot be expected to contribute towards Affordable Housing”*.
- 5.104 **Fire Safety:** In accordance with the requirements of London Plan **Policy D 12**, a fire strategy has been submitted with the application, prepared by Pentrevion Fire. These outlines the active and passive systems, comprising the development’s fire prevention measures. These include, a fire detection/alarm system, automatic water fire suppression system and compartmented floors with FD30 fire doors.
- 5.105 Further to this, the document details evacuation strategy and the necessary information for an emergency have been provided in full.

Therefore, the proposal is in accordance with the requirements of the London Plan.

5.106 **Community Infrastructure Levy:** The proposed development is CIL liable; the relevant forms have been submitted with this application.

6. Conclusion

6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.

6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would be without adverse effect on the character of the area, the adjacent heritage asset or the amenity of neighbouring residents.

6.3 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.

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| CIL
| Enforcement
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| Viability

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