

# NATIONAL WATER STANDARDS STATEMENT

TO SUPPORT PLANNING APPLICATION FOR  
CONSTRUCTION OF PART TWO STOREY AND PART SINGLE STOREY ATTACHED DWELLINGHOUSE;  
PROVISION OF REFUSE / RECYCLING STORAGE, AND AMENITY SPACE

AND

ASSOCIATED ALTERATIONS TO 15 TAYBEN AVENUE;  
(FOLLOWING DEMOLITION OF EXISTING WORKSHOP / STORAGE TO 15 TAYBEN AVENUE,  
GARAGE TO 13 TAYBEN AVENUE

AND

RE-POSITION OF BOUNDARY)

## 1. INTRODUCTION

The London Borough of Richmond Upon Thames (the "Council") Local Validation Checklist requires a **National Water Standards Statement** to be submitted for new residential units (new build or conversion).

This **National Water Standards Statement** is therefore submitted in support of the planning application, to the London Borough of Richmond Upon Thames Planning department (the "Council"), for the:

- Demolition of the existing garage to 13 Tayben Avenue,
- Demolition of the existing storage / home workshop to 15 Tayben Avenue,
- Removal and re-positioning of boundary between 13 and 15 Tayben Avenue,
- Erection of a two storey extension with rear single storey extension to the side of 13 Tayben Avenue to form a new self-contained dwelling (the "Proposed"), and
- Associated alterations to 15 Tayben Avenue; (the "Proposed Development").

Where, in this Statement:

- Measurements are given, they are approximates and in metres.
- Extracts of plans, maps and or drawings are shown, they are not to scale.
- Photographs are shown, they are also not to scale and, unless otherwise stated, are as at 2023.
- Lettering and numbers are in:
  - 'curved' brackets, they are drawing numbers of architectural plans.
- Quotations are coloured in:
  - **Brown**, they are text from the quoted caselaw; and
  - **Blue**, they are text from the quoted planning legislation / policy / guidance.

The planning application for the Proposed Development (the "Planning Application") is essentially an amended submission for the development proposed under planning application 22/3276/FUL (the "Original Planning Application"). The Original Planning Application was refused by the Council on 12.05.2023.

The matter was referred to appeal, under appeal reference APP/L5810/W/23/3332811 (the "Appeal"). The Appeal was assessed by Inspector C Livingstone MA (SocSci) (Hons) MSc MRTPI (the "Inspector") on 23.07.24. The Inspector dismissed the Appeal on 23.07.2024 (the "Appeal Decision") because "*...there is no suitable mechanism before me to secure an affordable housing contribution or restrict parking...*"; i.e. no completed Unilateral Undertaking, pursuant to section 106 of the of the Town and Country Planning Act 1990 (as amended) had been provided.

## **1. PLANNING POLICIES & GUIDANCE**

The Applicant understands the following:

- Below legislation / national policy is the London Plan, which forms part of the ‘development plan’.
- The ‘development plan’ contains a set of policies and guidance for development of the borough and the Council’s ‘local plan’ (adopted by the Council on 03.07.2018) (the “Local Plan”) also forms part of this ‘development plan’.
- The legislation provides that planning decisions must be taken in accordance with the ‘development plan’ unless there are material considerations that indicate otherwise.
- The Council’s Local Plan is within the framework of material planning considerations.
- The Council’s Supplementary Planning Documents (“SPD”) provide greater detail on policies.
- The Council have prepared a new ‘local plan’. This was made available for public consultation on 09.06.2023 and this ended on 24.07.24. The Applicant understands that, by submitting the Richmond Publication Version Local Plan (Regulation 19 version) (the “Draft Plan”) for independent examination, the Council has formally confirmed its intention to adopt the Draft Plan and its supporting documents is now a ‘material planning consideration’.

### **2.A. National / Development & Local Plan Policies**

The main development plan policies are as follows:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Nationally Described Space Standards (2015)
- London Plan Guidance Fire Safety Policy D12(A) Pre-Consultation Draft, March 2021
- Building Regulations
- London Plan 2021
  - Policy D12
  - Policy SI 15 – Water Infrastructure
  - Policy GG 6 – Increasing Efficiency and Resilience
  - Chapter 6 – London’s Transport
- Local Plan
  - Policy LP 1 Local Character and Design Quality
  - Policy LP 2 Building Heights
  - Policy LP 8 Amenity and Living Conditions
  - Policy LP 21 Flood Risk and Sustainable Drainage
  - Policy LP 22 Sustainable Design and Construction
  - Policy LP 34 New Housing
  - Policy LP 35 Housing Mix and Standards
  - Policy LP 36 Affordable Housing
  - Policy LP 37 Housing Needs of Different Groups
  - Policy LP 39 Infill, Backland and Backgarden Development
  - Policy LP 45 Parking standards and servicing

### **2.B. LBRUT’s Supplementary Planning Documents / Guidance**

The main SPDs are as follows:

- House Extensions and External Alterations SPD (2015) (“HEAEA SPD”)
- Residential Development Standards SPD (2010) (“RDS SPD”)
- Sustainability Construction Checklist SPD (2011) (SCC SPD”)

- Design Quality SPD (2006) (“DQ SPD”)
- Planning Obligations SPD (2014) (“PO SPD”)
- Affordable Housing SPD (2014) (“AH SPD”)
- Refuse and Recycling Storage Requirements SPD (2015) (“RARSR SPD”)
- Front and Other Off-Street Parking Standards (2006) (“FAOOSPS SPD”)

Policy SI 5 and GG 6 of the New London Plan aims to increase efficiency and resilience by minimising, conserving and protecting the use of mains water, water supplies and resources in a sustainable manner.

Policy LP 22 states:

*“Developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change.”*

Paragraph 6.3.4 of LP 22 states:

*“The Council has adopted the 'optional' higher national technical standard for water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) in line with the national technical standard set out in Part G of the Building Regulations 2013. All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target.”*

The 'optional' requirement for water efficiency under Part G2 of the Building Regulations stipulates a maximum of 110 litres per person per day including a provision of 5 litres per person per day for external use.

## **2. METHOD**

It is understood that, as outlined in Building Regulations G2, there are two approaches which will ensure that the building will not exceed 110 litres per person per day and they are as follows:

1. An estimation of the consumption of wholesome water in accordance with the methodology in the water efficiency calculator. An example is attached. The attached calculations however are not valid for Building Control purposes or for the actual operation of the development.
2. A fittings approach in accordance with the maximum fitting consumption standards in the Building Regulations. This approach will make full use of water saving devices, water efficient fixtures and fittings by ensuring maximum opportunity for water saving measures and appliances is achieved.

Building Control will need to be informed that the standard of 110 litres per person per day applies to the Proposed.

## **3. CONCLUSION**

The development is committed to effective implementation of the methods outlined above to ensure that the standards are met.

It is considered that the Proposed will meet the requirements of the London Plan and Local Plan with and the Proposed Development should therefore be supported.

**21<sup>ST</sup> AUGUST 2024**