



PLANNING STATEMENT

99 Atbara Road, Teddington, TW11 9PA

The erection of a self-build detached dwelling with associated refuse stores and 1x ASHP and 6no. solar panels on the roof following the demolition of the existing dwelling

**PREPARED BY
FIONA JONES BSc(Hons) BTP MRTPI**

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1.0 INTRODUCTION

1.1 This Statement is submitted to support the plans for a replacement dwelling at 99 Atbara Road in Teddington to be lived in by the family of the applicant. The statement describes the site and proposal and sets out how the proposal is considered to comply with the policies and guidance as set out in the NPPF, the London Plan and the London Borough of Richmond upon Thames Local Plan plus Supplementary Planning Documents.

1.2 This planning applications follows the positive pre-application concept meeting held on 7th December 2023 with the planning officer James Phillips. His verbal advice was as follows:

- 1) *The principle of demolishing the building is acceptable*
- 2) *Some aspects of the design could be amended. The width of the proposal is acceptable.*
- 3) *Impact on no. 101 needs addressing with a Sunlight/daylight report for impact on side window and rear of no.101.*
- 4) *Address impact on Broom Water Conservation Area.*
- 5) *Optimising site – need to address housing mix issue.*
- 6) *Flooding – no comments. EA to be consulted at application stage. Drainage – more detail required.*
- 7) *Transport – 1.5 off street parking bays needed – parking proposed is acceptable. Landscaping to front is well received. Show bike storage. Refuse: 360l bin, 2 x recycling boxes, 1 x food bin, 1 x 240l garden waste bin. Show details of bin storage.*
- 8) *Trees and ecology – tree report to outline impact on tree fronting no.101.*
- 9) *PEA for demolition needed due to potential impact on bats.*
- 10) *Energy enhancements. Affordable housing and potential viability report.*
- 11) *Provided list of documents required for the submission.*

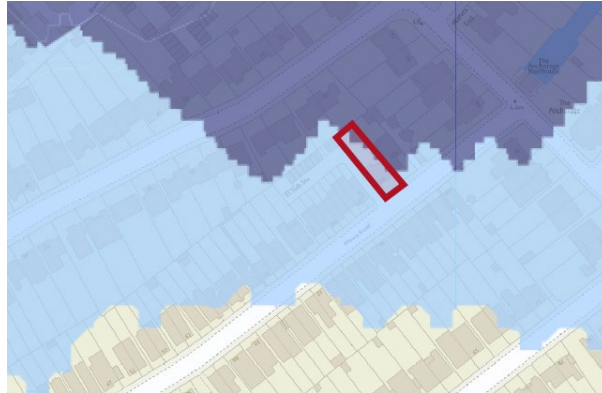
2.0 BACKGROUND and SITE

2.1 The site comprises a detached bungalow situated on the north side of the road dating from 1923. To the side of the house is an access path which leads to garages which are located to the rear of nos. 85 to 97a Atbara Road.

2.2 To the east side of the application site is another bungalow (dating from the 1950s) which extends beyond the rear of no.99 with windows along the side elevation facing the garden of

no.99. The properties to the other side of the access way are 2 storey 1970s terraced residential properties. Opposite is traditional Georgian 2 storey semi-detached dwellinghouses.

- 2.3 The site is situated within flood zone 2 with part of the garden in flood zone 3, as shown below from the extract from the EA's website:



- 2.4 The site is close to, but not within, the Broom Water Conservation Area – the properties along Broom Road which back onto the neighbouring property, 101 Atbara Road, are within the conservation area. There are no protected trees within the site but an important street tree is close by outside no.101 Atbara Road.

- 2.5 Photographs of the site are shown below of the site and immediate surroundings.



99 Atbara Road



101 Atbara Road



Land to the side of 101 Atbara Road



97a Atbara Road



Garages at the end of the access leading alongside 99 Atbara Road



Housing opposite the application site

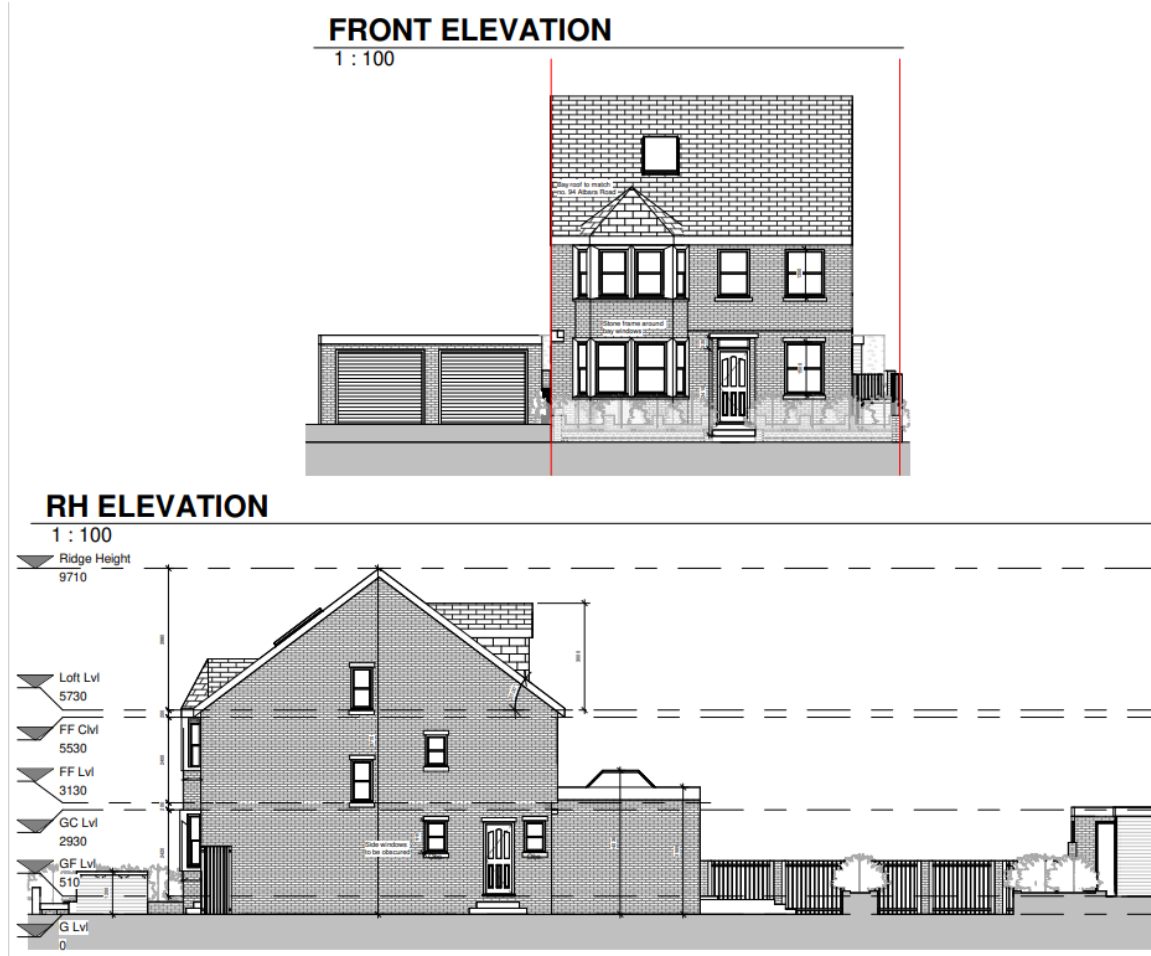
- 2.6 The area has a Public Transport Accessibility Level of 1a which is poor but there are bus routes in close proximity to the site.

3.0 PLANNING HISTORY

- 3.1 There is no planning history for the site. The only planning history associated with the site relates to the erection of a bungalow granted planning permission in 1956 – now known as 101 Atbara Road.
- 3.2 In 1978, planning permission was granted for the erection of 8 three storey three bedroomed terraced houses; formation of an access road, retention of 6 existing garages and provision of two car spaces and 7 future parking bays (ref. Number: 77/0810) at 85-99 Atbara Road Teddington.

Pre-planning application

- 3.3 As set out in the introduction, a pre-application meeting was held with the planning officer, James Phillips on 7th December 2023 following submission of plans for a replacement dwelling, as shown below:



In response to the case officer's comments, the following has been addressed in this proposal:

- 1) Some aspects of the design could be amended. The width of the proposal is acceptable
Response: The roof size has been reduced (ridge height 1.04m lower) to reduce the scale and height. The property would be naturally larger than some others on the street as it benefits from being a wider plot with a larger garden and is close to the Broom Road Conversation Area which has several large detached properties. Traditional features have been added including banding, hanging tiles and increasing the size of the gable above the bay to ensure a more cohesive traditional design.
- 2) Impact on no. 101 – proposal will be taller and deeper than existing. Sunlight/daylight report needed for impact on side window and rear of no.101.
Response: this has been provided and is addressed below. This has been addressed in paragraphs 6.22-6.29 below
- 3) Address impact on Broom Water Conservation Area.
Response: This has been addressed in paragraph 6.18 below.

- 4) Optimising site – need to address housing mix issue.

Response: This has been addressed in paragraphs 6.14-6.15 below.

- 5) Flooding – no comments. EA to be consulted at application stage. Drainage – more detail required.

Response: A flood risk assessment and separate SUDS report have been provided to address all flooding and drainage issues.

- 6) Transport – garage too shallow to park a car. 1.5 off street parking bays needed – parking proposed is acceptable. Landscaping to front is well received. Show bike storage. Refuse: 360l bin, 2 x recycling boxes, 1 x food bin, 1 x 240l garden waste bin. Show details of bin storage.

Response: 1x parking bay and 1x parking space within the garage (which could accommodate a smaller car up to 4.4m) are provided along with bicycle parking within the rear garage. Electric Vehicle Charging Point to be provided against the garage. Bin store provided within the front garden.

- 7) Trees and ecology – tree report to outline impact on tree fronting no.101.

Response: A tree report is provided by GHA Trees and addressed in paragraph 6.31 below.

- 8) PEA for demolition needed due to potential impact on bats.

Response: An ecological assessment is provided by Philips Ecology and addressed in paragraph 6.32 below.

- 9) Energy enhancements.

- 10) Response: An energy assessment is provided by Blue Sky Unlimited and addressed in paragraphs 6.36 to 6.38 below.

- 11) Affordable housing and potential viability report.

Response: A financial viability assessment is provided by ET Planning and addressed in paragraph 6.15 below.

- 12) Provides list of documents required for the submission.

4.0 PROPOSAL

- 4.1 The proposal seeks permission for the demolition of the existing bungalow and to replace it with a 2 storey 4 bedroom house with rooms in the roofspace. The design has taken its cues from the houses opposite to include a front double storey bay window with sash windows throughout with the exception of sliding glass doors on the ground floor rear element. The roof would be gable ended with solar panels on the front roofslope (south facing) and 2no.

dormers within the rear roof slope. The rear single storey extension is integrated into the house and includes a hipped slate roof to match the main roof of the house. The garage and 1x parking space to the rear of the site would remain for parking. A ASHP unit will be located on the side of the garage, so to minimise noise around the rear of the house. An internal ASHP unit will be located in the utility room.

- 4.2 Materials would comprise red brick with slate roof tiles. The front garden would be landscaped and include a bin store. Below is an extract from the pre-app street scene and the proposed street scene to show how the scheme has been amended to address the Council's concerns raised at the pre-planning meeting.



Pre-app proposed street scene



Current proposed street scene

5.0 PLANNING POLICY

5.1 The development plan comprises the Richmond upon Thames Local Plan (2018) and the London Plan (2021). The National Planning Policy Framework (NPPF) 2023 is also a material consideration. Relevant policies are set out below:

National Planning Policy Framework (2023)

5.2 Paragraph 38 of the National Planning Policy Framework states that:

“Local planning authorities should approach decisions on proposed development in a positive and creative way ... Decision-makers at every level should seek to approve applications for sustainable development where possible”.

[Emphasis Added]

5.3 Paragraph 61 says that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment. It goes on at Paragraph 62 to say that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in policy, including “people wishing to commission or build their own homes”.

5.4 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 On 30th July 2024, the new government produced an amended National Planning Policy Framework for consultation until 24th September 2024. The only section affected is the removal of the word ‘beautiful’ when referring to design in section 12.

London Plan (2021)

5.6 The main London Plan policies applying to the site are:

- Policy GG2 Making the best use of land

- Policy G6 Biodiversity and access to nature
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D6 Housing quality and standards
- Policy D12 Fire Safety
- Policy H2 Small sites
- Policy HC1 - Heritage Conservation and Growth
- Policy SI 13 Sustainable Drainage
- Policy T6.1 Residential parking

LBRUT's Local Plan (2018)

5.7 The main Local Plan policies applying to the site are:

- LP1 Local Character and Design Quality
- LP3 Designated Heritage Assets
- LP8 Amenity and Living Conditions
- LP15 Biodiversity
- LP16 Trees, Woodlands and Landscape
- LP20 Climate Change Adaptation
- LP22 Sustainable Design and Construction
- LP24 Waste Management
- LP35 Housing Mix and Standards
- LP36 Affordable Housing
- LP 39 Infill, Backland and Backgarden Development
- LP44 Sustainable Travel Choices
- LP45 Parking Standards and servicing

Richmond Publication Local Plan (Regulation 19 version)

5.8 The Richmond Publication Version Local Plan (Regulation 19 version) was considered at Full Council on 27th April 2023. Approval was given to consult on the Regulation 19 Plan and, further, to submit the Local Plan to the Secretary of State for Examination in due course. Together with the evidence, the emerging Local Plan is now a material consideration for the purposes of decision-making on planning applications. The weight to be given to each of

the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF.

- Policy 1: Living Locally and the 20-minute neighbourhood
- Policy 2: Spatial Strategy: Managing change in the borough
- Place-based Strategy for Teddington & Hampton Wick
- Policy 3: Tackling the climate emergency
- Policy 4: Minimising Greenhouse gas emissions and promoting energy efficiency
- Policy 5: Energy Infrastructure
- Policy 6: Sustainable construction standards
- Policy 7: Waste and the circular economy
- Policy 8: Flood risk and sustainable drainage
- Policy 15: Infill and Backland Development
- Policy 16: Small Sites
- Policy 19: Managing the impacts of development on local surroundings
- Policy 28: Local character and design quality
- Policy 29: Designated heritage assets
- Policy 39: Biodiversity and Geodiversity
- Policy 42: Trees, Woodland and Landscape
- Policy 44: Design process
- Policy 46: Amenity and living conditions
- Policy 47: Sustainable travel choices
- Policy 48: Vehicular Parking, Cycle Parking, Servicing and Construction Logistics Management
- Policy 53: Local Environmental impacts

Community Infrastructure Levy (CIL)

- 5.9 The applicant is entitled to self-build exemption from the Community Infrastructure Levy and the form has been submitted with this application confirming self-build.

6.0 PLANNING CONSIDERATIONS FOR NEW DWELLING

6.1 The main planning issues relate to the principle of replacing the dwelling, housing mix, the impact on the character and appearance of the area including the neighbouring conservation area, the standard of accommodation provided, flooding and drainage, parking, trees, sustainability and impact on neighbouring properties and on trees and biodiversity/ecology.

1) Principle of Replacement

6.2 The National Planning Policy Framework sets out a presumption in favour of sustainable development and advises Councils to take a positive approach to delivering new homes. The NPPF also attaches great importance to the design of the built environment stating that developments should be visually attractive as a result of good and beautiful architecture. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

6.3 Local Plan Policy LP35 requires development to generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix would be appropriate to the location. The scheme is a replacement infill development and therefore its acceptability will be determined against the principles of policy LP 39. Notwithstanding this, the site should be acceptable in principle for residential development given the existing residential nature and use of the area. This acceptability is subject to compliance with the policies set out above and further discussed below.

6.4 Local Plan Policy LP 38 'Loss of Housing' requires that existing housing should be retained but redevelopment of existing housing can 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 Housing Mix and Standards.

6.5 The policy requirement notes that redevelopment can be acceptable where this would have greater sustainability benefits, and it is noted that the proposed building would have enhanced

energy performance and follow the principles of sustainable construction to an advance level, as required by current regulations and guidelines.

- 6.6 The application is supported with the Energy Performance Certificate which demonstrates that the current dwelling only has energy efficiency rating of E, and only has a potential of C, far below the energy and carbon efficiency of the proposed replacement dwelling which would incorporate the recommendations of the Energy Statement, including air-source heat pump, photovoltaic panels and highly energy efficient building fabric (timber frame with Kingspan ULTIMA wall insulation and fully insulated ground floor).
- 6.7 The walls of the current building are not well suited to retrofitting insulation, given the solid walls mean that internal wall insulation would be required, leading to a substantial loss of internal space, and would still be much less energy efficient than the proposed fabric (e.g. The retrofitted insulation would still result in numerous cold bridges and low efficiency floor and roof insulation).
- 6.8 The nature of the current dwelling, with unused chimney breasts protruding in each room and roof/loft space that is uninsulated and not converted into living space, mean that such a substantial level of demolition and rebuilding (e.g. removal of chimney breasts, walls, replacement of roof, insertion of new staircase etc.) would be required to convert the existing property to provide adequate living space for a family, such that there would be very little retained of the original fabric of the building. As such, it is much more appropriate to demolish the existing building to maximise the potential of the site.
- 6.9 It is also worth noting that the flood risk mitigations proposed can only realistically be achieved through a full rebuild, particularly the raising of floor levels, and use of flood resistant materials on the ground floor.
- 6.10 Other defects to note:
- Windows in inappropriate locations (e.g. Side bedroom window at ground level facing onto the side access road) and unobscured side windows facing #101 Atbara Road.
 - Boiler that is ~20years old, with the system in need of full replacement.
 - Analogue electricity meter in need of replacement, and other suboptimal electrics (wall mounted sockets, wall mounted wires, external wiring to garage and shed that is not buried below ground).

- 6.11 Further, at the concept meeting in December 2023, the case officer, James Phillips, confirmed that the principle of demolition was acceptable in this situation and referred to precedent for similar schemes in the area. A similar proposal for the demolition of a bungalow and replacement with a 5 bedroom house was allowed on appeal in November 2022 at 45 Langham Road also in Teddington (ref. 22/0523/FUL).
- 6.12 The existing building is also of limited architectural merit to further justify the loss of this building and in addition to the information provided above, complies with the requirements of Policy LP 38 of the Local Plan.

2) Housing Mix

- 6.13 Policy LP35 of the Local Plan details that 'Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location'.
- 6.14 The area is outside of one of the main centres, this 4 bedroom family dwelling house is compliant with Policy LP35. It is considered that this proposal represents the optimum design for the size of the site, taking into account the provision of parking spaces, garden space. Further, this house is a self-build specifically for this family and they would not want to live in flats but a well-design bespoke family home.

3) Affordable Housing

- 6.15 In accordance with Policy LP36, as this proposal seeks the provision of a dwelling (albeit as a replacement dwelling), the Calculation of the Commuted Sum for the provision of Affordable Housing off-site has been provided. The sum is calculated as £64,724. A viability assessment has been provided which concludes that "The results show that only in an extreme case of 10% increase sales values and a decrease in construction costs the scheme would be viable to provide an affordable housing contribution. It is extremely unlikely that the scheme would achieve a higher sales value, especially in the current economic climate. Therefore, we conclude that the scheme would be unviable to provide an affordable housing

contribution”. The applicant is aware that they will need to fund the review of this assessment and for the conclusions to be agreed.

4) Impact on Character and Appearance, including the nearby conservation area

- 6.16 This part of the Atbara Road is an eclectic mixture of housing styles, heights and designs. However, the bungalow looks out-dated and the provision of a 2 storey dwelling with rooms in the roof would sit comfortably within this streetscene. The house would adjoin the 2 storey dwellings on the other side of the access way and opposite other 2 storey dwellings. Although it would adjoin no.101, which is a bungalow, this relationship is common and would not appear out of keeping or character with this part of Teddington – see nos. 8 and 10 Atbara Road:



- 6.17 The design of the dwelling has taken its cues from the houses opposite by including a 2 storey bay feature and gable ended roof. Materials can match those in the immediate vicinity.
- 6.18 The proposal has been amended from the pre-application scheme by ensuring that the height is at the same height as the neighbouring property, no.97a. This ensures that the property would fit comfortably within the streetscene and would not result in harm to the character of the streetscene. Further, the edge of the Broom Water Conservation Area comprises the end of the garden backing onto no.101 Atbara Road so this site is not within the setting of the conservation area. Notwithstanding this, the proposal is consistent with the grand detached houses which lie within the nearby conservation area and would be in keeping with the character and appearance of the Broom Water Conservation Area.

- 6.19 Regarding the front bay (and design generally), the applicant has taken the recommendations from the concept meeting into consideration, including increasing the size of the gable above the bay to better match the bay and the roof, reducing the size of the roof, improving the consistency of the windows on the front and rear elevations and ensuring the rear ground floor protrusion is more aesthetically integrated by giving it a pitched roof. The applicant has also added features, such as the hanging tiles above the bay and stone banding to give the proposed house a more traditional appearance (to match the traditional bay feature), in keeping with the road and those houses opposite.
- 6.20 The resulting development would relate well to the character and appearance of the street and the scale, bulk and mass of the proposed building, which would replace a low quality 1920s building of limited architectural merit. We consider the proposal would have a positive impact on the character and appearance of the area generally. The proposed dwelling would have balanced proportions, drawing from the architectural detailing of other houses. Given the variety of houses along the street, the proposal would harmonise with its surroundings.
- 6.21 The development would therefore be in accordance with the aims and objectives of the NPPF and Local Plan, particularly policies LP 1 and LP 39 of the Adopted Local Plan; and the 'Design Quality' (2006), 'Small and Medium Housing Sites' (2006), 'Residential Development Standards' (2010) Supplementary Planning Documents.

5) Impact on Neighbour Amenity

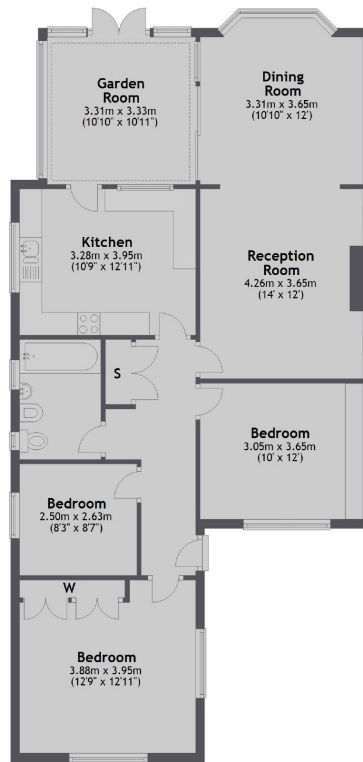
- 6.22 Policy LP8 of the Local Plan advises that all development is required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The proposal seeks a replacement dwelling on the same plot and siting of the previous dwelling. The only impact would be upon the residents of no.101 Atbara Road due to the access road providing a 4.5m gap between the side of the proposal.



6.23 As shown in the photographs below, the side elevation of no.101 currently extends significantly beyond the rear of no.99 by 8m and includes a number of windows within this elevation. These windows facilitate:

- i) a kitchen side window (blinds are always closed day and night (see images below). This window is not the primary light source for the kitchen as there are rear facing windows leading onto the garden room (see 101 kitchen image below)
- ii) and iii) bathroom obscured glass window
- iv) box bedroom (smallest of the three) - blind always closed. Note that this bedroom is below the national standard for a single bedroom measuring 2.5m x 2.63m (6.5sqm).

6.24 The proposal would be at a height of 2.5 storey for a depth of 10m (the current dwelling measure 8.5m deep where it adjoins no.101) and thus this would extend to between the kitchen and bathroom of no.101. A single storey element would extend out by 4m but the rear of no.101 would still be longer than the proposed house by 2.5m. This would ensure the kitchen window within the side elevation of no.101 is not blocked or impacted by the proposed dwelling. In any event, this window is a secondary window with the main light coming into the rear of the house via the conservatory.



Layout for no.101 Atbara Road



Side of no.101 Atbara Road



Kitchen of no.101 Atbara Road



Garden of no.99 looking towards no.101



Blinds on no.101's windows which are closed all the time

6.25 A Sunlight/Daylight analysis has been undertaken by Richard Staig who confirms that:

“The analysis demonstrates that whilst windows W1 & W2 (side elevation windows of 101 Albara Road facing onto the site) have reductions in daylight than will be discernible to the human eye, the effect upon the daylight distribution to the kitchen of 101 Atbara Road is de minimis.

With regard to the Bedroom served by W1, this also shows a substantial effect on the daylight distribution as well.

Whilst these results show an adverse effect to the Bedroom of 101 Atbara Road, it is important to consider both the advice of NPPF and BR209 (2022) itself before reaching any conclusions.

NPPF paragraph 129(c) provides:

c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

The properties on Atbara Road consist of two-storey dwellings with either front or rear mansard extensions. However, 99 and 101 Atbara Road are both bungalow dwellings. The attached agents' details for 101 Atbara Road show the internal configuration of the property, demonstrating that the affected bedroom is actually a secondary bedroom, with the principal bedrooms having outlooks unaffected by the proposals.

Considering NPPF 129(c) and paragraph 1.6 of the BR209 (2022), even though the results indicate a noticeable impact on the daylight to the secondary bedroom, taking into account the existing building type on Atbara Road and the proposed dwelling on the site, it would be reasonable to consider the proposals acceptable and grant Planning Permission”.

6.26 Whilst the sunlight/daylight report assumed that the side room was a bedroom and thus a habitable room, as stated above, it is substandard in size for a bedroom being below 7.5sqm and therefore, there is a strong argument to conclude that this room should not be analysed for the impact on the light reaching this room. In any event, the room has a blind down at all times and thus the light is limited which enters this room. Further, this room is used as a home office.

6.27 On another application in the borough, in East Sheen (ref. 24/1346/PS192), the officer noted that “Whilst the cited GIA on the particulars of 109.62sqm would considerably exceed the NDSS standard for a 1 storey 3 bed dwelling, the study does not appear to meet the current London Plan space standards for a single bedroom (under policy D6) and so the assessment below has been undertaken on the basis of the property being a 2B4P dwelling”. Therefore, the Council did not assess the single bedroom as such due to its substandard size. The importance of consistency in planning decisions is recognised as a matter of established law, as was explained by Mann LJ in the seminal case of *North Wiltshire District Council v Secretary of State for the Environment* (1993) 65 P & CR 137:

“One important reason why previous decisions are capable of being material is that like cases should be decided in a like manner so that there is consistency [...]. Consistency is self-evidently important to both developers and development control authorities. But it is also important for the purpose of securing public confidence in the operation of the development control system.”

6.28 Therefore, the LPA is requested to exclude the small room to the side of no.101 in terms of impact on amenity as it’s below standard in size and shouldn’t be counted as a habitable room.

6.29 The proposed development would not lead to significant visual intrusion, excessive overlooking, privacy or daylight and sunlight implications when it comes to impact on the nearest neighbouring occupiers, in compliance with Policy LP8.

6) Standard of Accommodation

6.30 The London Plan advises that housing should be of the highest quality internally and externally and must adhere to the internal space standards set out in table 3.1 of the Plan. A

Residential Standards statement has been prepared that sets out the accommodation proposed and demonstrates that it complies with the national, regional and local space standards.

7) Impact on Trees, Biodiversity, Ecology

- 6.31 The proposal does not require the removal of any trees. The proposal is in close proximity to the Honey Locust tree fronting no.101 Atbara Road and therefore an Arboricultural Impact Assessment has been carried out by Glen Harding of GHA Trees. This concludes that the retained trees are at a satisfactory distance from the proposed new building outline and highly unlikely to give rise to any inconvenience. Some minor lateral pruning of T5 may be required in the medium term; however, any such work would not have a significant impact on the health or amenity value of this tree. The proposal's foundations are outside the root protection area of the Honey Locust tree. Therefore, the landscape character of the site will be unaffected by the proposal.
- 6.32 As the proposal is a self-build project and the applicant will live in this house, it is exempt from providing Biodiversity Net Gain. A separate statement is provided to this effect. The PEA did not identify any protected species that need to be considered in the demolition and construction, and that the proposal will incorporate the recommendations of the PEA, including: provision of bird box, bat brick and use of suitable native planting. The proposal can include the provision of biodiversity enhancing on the site, complying with policies LP15 and LP16 of the Local Plan.

8) Transport and Parking

- 6.33 Policy LP44 and LP45 of the Local Plan states that it is necessary to consider the impact of any new development on the existing wider and local transport network and that development will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. The maximum parking standards contained within the London Plan will be expected to be met, unless it can be shown that in proposing levels of parking applicants can demonstrate that there would be no adverse impact on the area in terms of street scene or on-street parking.

- 6.34 The application is for a replacement 2-storey 4-bedroom dwelling-house with associated hard and soft landscaping, cycle and refuse stores. The following is relevant to this site:
- The site is located in an existing residential area, close to local facilities including shops, cafes, restaurants and public open space;
 - The site is accessible by public transport, although it only has a PTAL rating of 1a;
 - Bicycle parking is provided within the existing garage at a level that fully accords with relevant parking standards; and
 - Any increase in trips to and from the site as a result of the proposed development would be negligible and would have no effect on the operation of the local transport network.
 - There is currently parking provision to the side of the rear garage, with an additional parking space for a smaller car (up to 4.4m) in the garage and this would remain as existing. Parking is also possible in front of the house on the road (for 2 cars).
- 6.35 The proposal is therefore considered to policy compliant and would not cause any adverse impacts upon the highway network.

9) Sustainable Design and Construction

- 6.36 Policy LP22 of the Local Plan stipulates developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. The policy requires development to be supported by a Sustainable Construction Checklist and a 35% reduction on carbon dioxide emissions.
- 6.37 As set out above, the existing building is extremely inefficient in both energy consumption/carbon emissions and expensive therefore to operate compared to recently modernized properties. The property is also outdated in terms of aesthetic design and energy efficiency for modern-day family living - The cost-of-living crisis and energy crisis has exacerbated the need to futureproof and mitigate fuel poverty at a national and local level.
- 6.38 A sustainable construction checklist and Energy Assessment is provided with this application. This explains that it is proposed to install an air source heat pump into the house to provide space heating and hot water. The total TER emissions for the house are calculated as **1,938 kg CO2 per year** with DER emissions of **1,557 kg CO2 per year**. The supporting spreadsheet makes an allowance for the energy saving/ renewable technologies including within the TER calculation. The reduction in emissions is therefore **381 kg CO2 per year**,

which equates to a reduction of **19.66%** for the 'Be Lean' case. The total emissions for the Be Green scenario are therefore calculated as **435 kg CO2 per year**. The reduction in emissions is **1,503 kg CO2 per year**, which equates to a reduction of **77.55%** for the 'Be Green' case. The energy efficiency measures incorporated into the development therefore meet the requirements of the local policy requirements.

10) Flooding and sustainable urban drainage

- 6.39 The site is located within Flood Zone 3a and a Flood Risk Assessment from STM Environmental has been submitted with this application. It confirms that the proposal provides significant improvement to the existing scenario by offering an area of safe refuge within the dwelling and future flood resilience and protection measures. As such STM Environmental believe this should be viewed in a pragmatic manner by the LPA and the sequential and exception tests should not be applied in this instance.
- 6.40 The FRA confirms that the development will increase the sites impermeable area and built up area by 44m² and as such, it may have a negative impact on local flood risk unless mitigation measures are introduced. The proposed Flood Risk Mitigation Measures include:
- CFS will be utilised to compensate for the larger development.
 - The existing garage will be retrofitted to become a floodable structure. The combination of both mitigation measures, results in a positive storage capacity for the site of +1.92m³.
 - Finished floor levels will be 300mm above the max flood depth for the 1% AEP + 17%CC scenario to a minimum height of 7.38mAOD;
 - Construction will utilise flood resistant materials and services will be placed as high as practicable to reduce impact of flooding;
 - Occupants will sign up for EA Emergency Flood Warning Direct Service;
 - Safe egress to Flood Zone 1 is accessibly by heading South west on Atbara Road for 200m and turning right onto Kingston Road.
 - The new development is safer due to access to upper floors, which the prior single storey development did not allow.
 - the revised drawings go above and beyond the Compensatory Flood Storage (CFS) recommendation, by fully levelling the garden CFS area to the lower level (rather than having a sloped garden, thus increasing the garden flood capacity by twice the amount recommended).

- 6.41 A SUDS report has been provided with the application. The proposal will introduce permeable paving, a rainwater butt, geocellular attenuation within the rear garden and front of the property. The report concludes that the proposed SUDS mitigation measures will reduce local flood risk and therefore complies with the LLFA's planning policy and the NPPF.
- 6.42 The FRA concludes that "based on the information reviewed and taking into account the proposed mitigation measures, it is considered that overall flood risk to the proposed development is acceptable and that the new development will not only provide betterment to the site but also increase storage potential of the floodplain. As such, the development is would be considered to be in general compliance with local planning policy and the NPPF".

7.0 CONCLUSIONS

- 7.1 The National Planning Policy Framework (NPPF) states that the social objective to achieving sustainable development is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places. It is sustainable development of good design that will contribute positively to ensuring this new self-build dwelling will provide an energy efficient home for this local family.
- 7.2 Self-Build Housing is a sector of housing in its own right and Policy LP37 'Housing Needs of Different Groups' is relevant in this case. This confirms that "Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies".
- 7.3 The NPPF 2021 is clear that the Government's objective is to significantly boost the supply of homes, and that in doing so the needs of groups with specific housing requirements, including those who wish to build or commission their own home, must be addressed.
- 7.4 Substantial weight should be afforded to the provision of this proposed Self-Build and Custom Build home in the planning balance in the determination of this application.

- 7.5 The National Planning Policy Framework (NPPF) 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*”.
- 7.6 The proposal complies with the above as the proposal would not harm the character and appearance of the area by being a similar style and height as neighbouring housing. The design is such that there would not be any overlooking or loss of privacy for future residents or those existing neighbouring.
- 7.7 The 2021 adopted London Plan puts an emphasis on pro-actively supporting well-designed new homes on small sites. This site is one such small site which is in a sustainable location, with fairly good public transport links and close to amenities and services. The existing building is extremely inefficient in both energy consumption/carbon emissions and the replacement dwelling would be of the highest energy efficiency.
- 7.8 The proposal to demolish the existing building and replace it with a new dwelling is wholly acceptable and would accord with National policy which promotes sustainable well-designed development. The proposal would sit comfortably within the plot and enhance the character of the street in close proximity to the Broom Water Conservation Area.
- 7.9 There are no highway safety or tree implications. The new development will not only provide betterment to the site but also increase storage potential of the floodplain.
- 7.10 Overall, the scheme is considered to be fully policy compliant, and we request that planning permission is granted.