



**DESIGN AND ACCESS STATEMENT  
(Including Flood Risk Assessment)**

**55 Avondale Road**  
Mortlake SW14 8PU

**24<sup>th</sup> September 2024**



Figure 1: The property as seen from Avondale Road.

1. Introduction / Existing Building / Context / Planning  
History / Design Policy Context

2. Design

3. Precedents

3

4. Proposal Drawings

5. Flood Risk Assessment

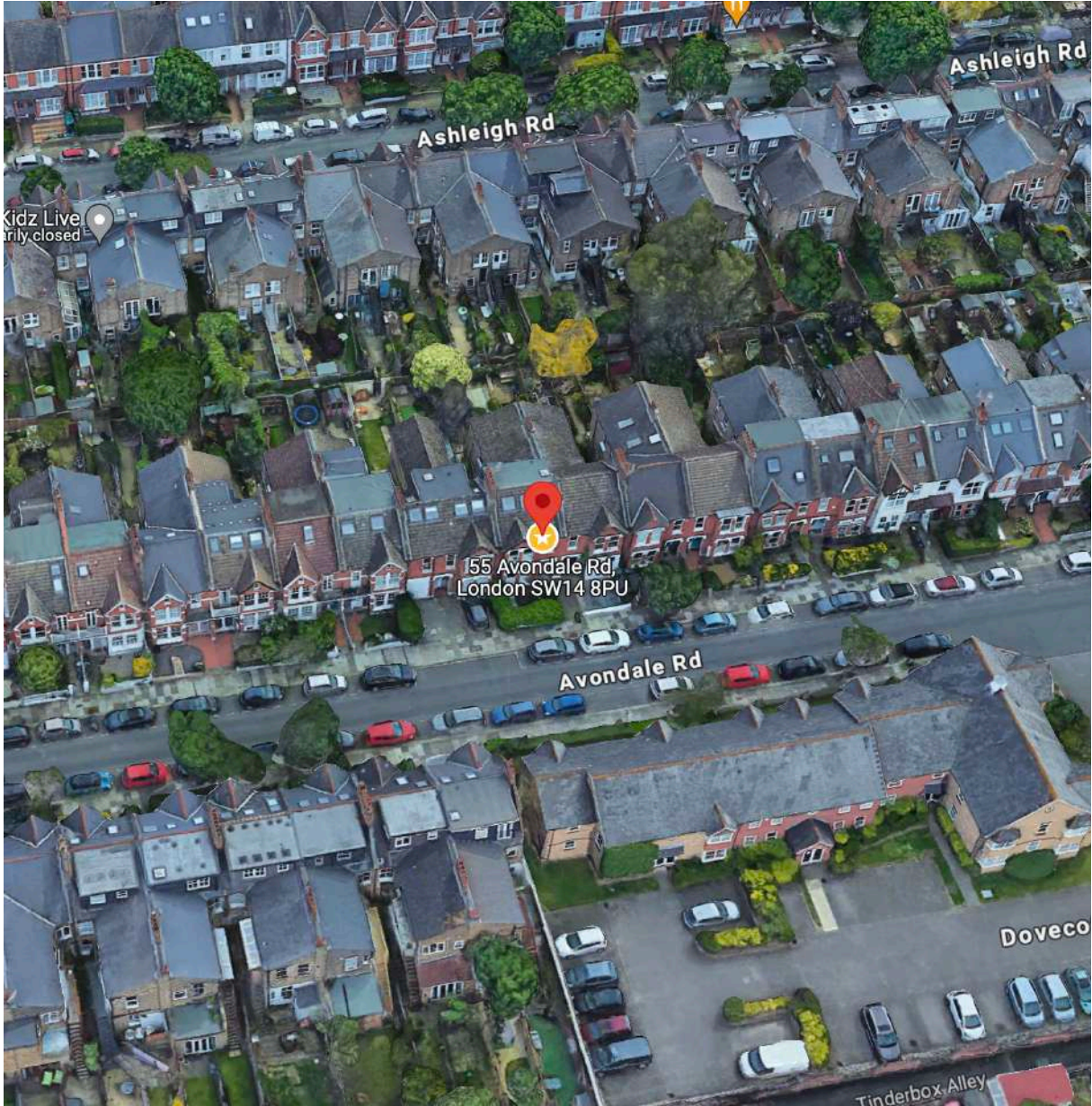


Figure 2: 3D aerial view (Google Maps).

## Introduction

Kingston Architects has been appointed as Architect by the owner for the proposed works to 55 Avondale Road. This document has been prepared in support of the works proposed and aims to provide an insight into the current building and a narrative for the proposal.

The proposal is for a second floor rear dormer extension, enlarging the existing dormer into an L-shape extending out over part of the outrigger. This will add a bedroom and a Gross Internal Area of approximately 14 sqm, which will help make 55 Avondale Road into a high quality, long-lasting family size home.

## Existing Building

55 Avondale Road is a first and second floor maisonette forming part of a mid-terrace Edwardian building with red brick to the front, yellow stock brick to the rear, and a grey tiled roof. To the front, windows are white painted sash with white stucco detailed lintels above.

## Context

The property is in a residential area within Mortlake Village (Character Area 2: West of White Hart Lane). It is not listed or within a conservation area.

A feature of these properties on Avondale Road and Ashleigh Road (which backs on to it) is large two-storey rear outriggers. A large number of these properties (including no.55) have rear-dormer loft conversions, and in a considerable number of these cases the dormer extends out over the outrigger.

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## Planning History

- 24/0842/FUL: Extension of existing rear dormer over part of the rear outrigger with 1no. roof light in flat roof. - Refused 28/05/24
- 10/2879/HOT: "Loft extension" - Granted 24/11/2010

## Design Policy Context

This proposal has been designed with reference to the following policies:

- National Planning Policy Framework (updated 2023)
- The London Plan 2021
- Richmond Upon Thames Local Plan (July 2018)
- Richmond Upon Thames SPD: Design Quality (February 2006)
- Richmond Upon Thames SPD: House Extensions & External Alterations (May 2015)
- Mortlake Village Planning Guidance SPD (December 2015)

## **Materials**

All external materials will match existing, including grey slate to the dormer walls and white UPVC windows.

## **Landscaping**

The proposal has no impact on landscaping.

There are no trees on the property or any near enough to be impacted. There is a hedge on the front boundary, unaffected by the proposal.

## **Access**

There is no impact on the accessibility of the property.

## **Neighbour Amenity (LP8)**

### Extract from Report for 3 Ashleigh Road

"Having regard to the amenity of the properties along Cowley Road, given the existing level of mutual overlooking and distance, the addition of fenestration at roof and first floor level is not considered to materially increase the degree of overlooking when compared to existing situation."

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### Extract from Report for 54 Ashleigh Road

"It is noted that the windows within the proposed dormers would offer elevated views in comparison to the existing situation, however there are a number of properties in the vicinity with similarly elevated views, and as such, it is considered there is already a degree of mutual overlooking."

## **Car Parking**

The front box-room is being repurposed to an office, so the number of bedrooms in the property remains the same. Even if the box room were used as bedroom, it would still fall within the same range of a 3-4 bedroom property, so no additional parking is required. Furthermore, the property is very well positioned for public transport.



Figure 3: Rear of property.

## DESIGN

The SPD on 'House Extensions and External Alterations' states that the overall shape, size and position of rear dormer extensions should not dominate the original roof and should harmonise with the original appearance. It also states that dormer windows should be smaller than those on the floor below to create a suitable window hierarchy.

This proposal has been careful to ensure that the new extension remains visually subordinate to the existing parts of the building. To this end, the proposal is a mansard style dormer stepped in at both the side and top, and extending less than half the length of the outrigger.

The windows in the dormer extension are shorter than those of the first floor below being 1300mm compared to 1500mm high, contributing to the subordination of the newer upper part.

### Design Evolution

Since the original planning application in April, we have had two further rounds of engagement with Local Authority, with a Pre-App in June and then follow-up further advice in August.

8 We have been keen to engage and to acknowledge the feedback, and each time we have revised the design of the outrigger dormer in both style and size (height and depth). In order to mitigate the perceived "over-dominance" of the proposal, the design has been amended to a mansard-style dormer with sloping walls (see Figure 4). The depth along the outrigger has now been reduced by a further 200mm in response to the additional advice received in August, giving a cumulative reduction through the four iterations of 1.1m in depth and 0.2m in height (see Figure 5).

As a result, the outrigger dormer extends noticeably less than half way down the outrigger. It is also both stepped in from the side eaves and stepped down from the existing dormer (which in turn is stepped down from the original ridge line). This means the dormer is subordinate both to the original roof of the outrigger and to the existing dormer and main roof, showing a clear hierarchy.





Figure 4: Visualisation of proposed mansard style dormer.

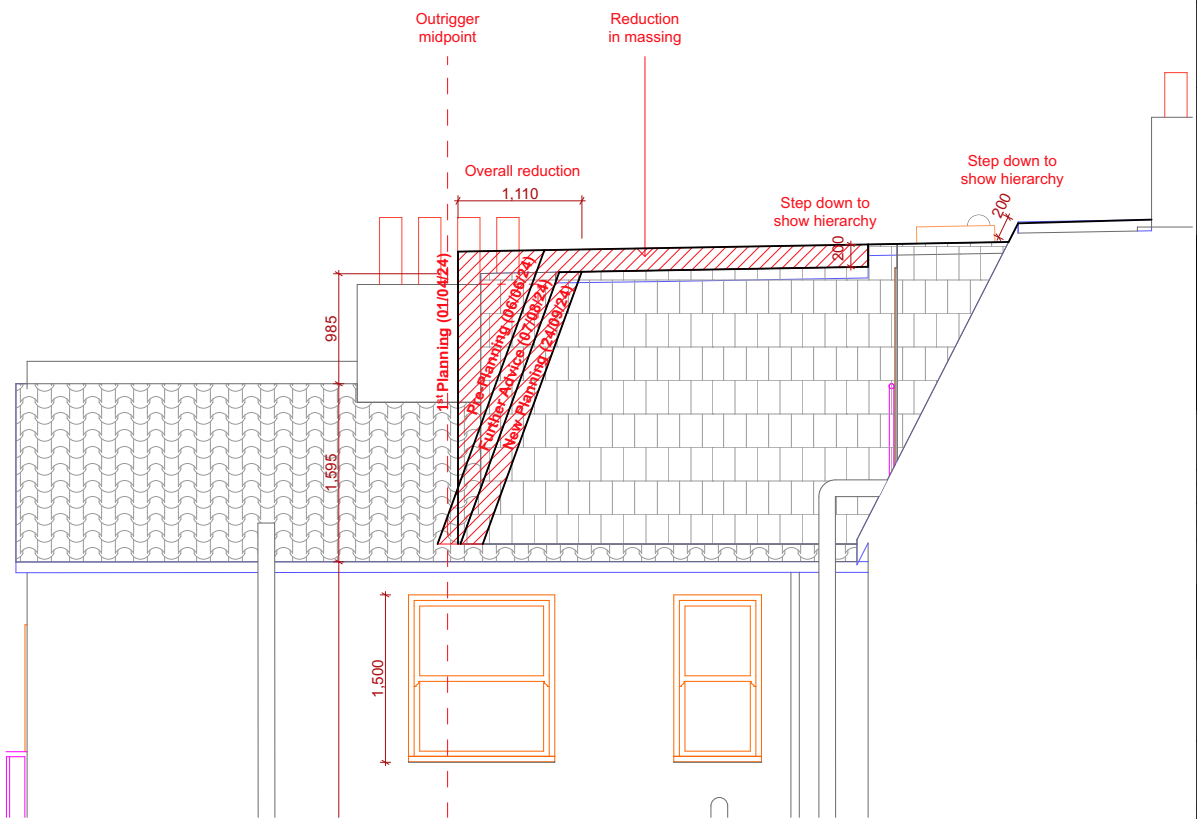


Figure 5: Visualisation of proposed mansard style dormer.

## PRECEDENTS

There are a large number of precedents both on Avondale Road and on Ashleigh Road, which backs on to it.

The following properties on these roads have loft dormers that extend out over the outrigger:

- 3 Ashleigh Road (21/2829/FUL)
- 54 Ashleigh Road (20/2619/FUL)
- 62 Ashleigh Road (19/3055/FUL)
- 68 Ashleigh Road (13/0616/HOT)
- 89 Ashleigh Road (20/1592/HOT)
  
- 27 Avondale Road (03/3037/HOT)
- 37 Avondale Road (14/2161/FUL)
- 45 Avondale Road (11/2550/FUL)
- 105 Avondale Road (07/4115/HOT)
- 111 Avondale Road (08/0553/HOT)

Two particularly relevant precedents are recent 3 Ashleigh Road (see Figure 8) and 54 Ashleigh Road, which backs directly onto this property (see Figures 6 and 7 opposite).

The Decision Reports for both these applications reference the number of similar extensions already on these roads as a significant factor in granting approval.

### Extract from Report for 3 Ashleigh Road

10 “However, upon assessing the surrounding environment, it is apparent that various properties, on the other side of Ashleigh Road and the surrounding roads, particularly Cowley Road, benefit from altered roof forms including large rear dormers and rear outrigger dormers. As such, on balance, the development would not appear out of character in the surrounding area.”

### Extract from Report for 54 Ashleigh Road

“Whilst the scale of the proposed roof extension is acknowledged, it is noted that a number of properties within the vicinity of the site benefit from similar roof extensions; most recently applications 20/1592/HOT and 19/3055/FUL granted consent at Nos. 89 and 62 Ashleigh Road respectively. It is also noted that Nos. 2, 14, 20, 22, 28 and 68 have all benefitted from similar extensions (see aerial image below) and whilst it is acknowledged that many of these were approved prior to the adoption of the current local plan and SPD, it is not considered that the proposal would appear significantly out of keeping with surrounding development.”



Figure 6: View over outrigger roof (with 54 Ashleigh Road's dormer beyond).



Figure 7: 54 Ashleigh Road's dormer directly behind this property, approved 2020.



Figure 8: Drawings for dormer at 3 Ashleigh Road, approved 2021.

The map in Figure 9 illustrates that 54 and 62 Ashleigh Road should qualify as "immediate context" as they are directly behind this property and nearer than properties on Avondale Road that have been deemed immediate context.

On the other hand, 16 and 11 Avondale Road (which had appeal decisions refused in 2016) are around 45m and 65m away respectively.

54 and 62 Ashleigh were granted planning permission in 2020 and 2019 respectively. This means they are not only considerably nearer than 16 and 11 Avondale Road, but also more recent.

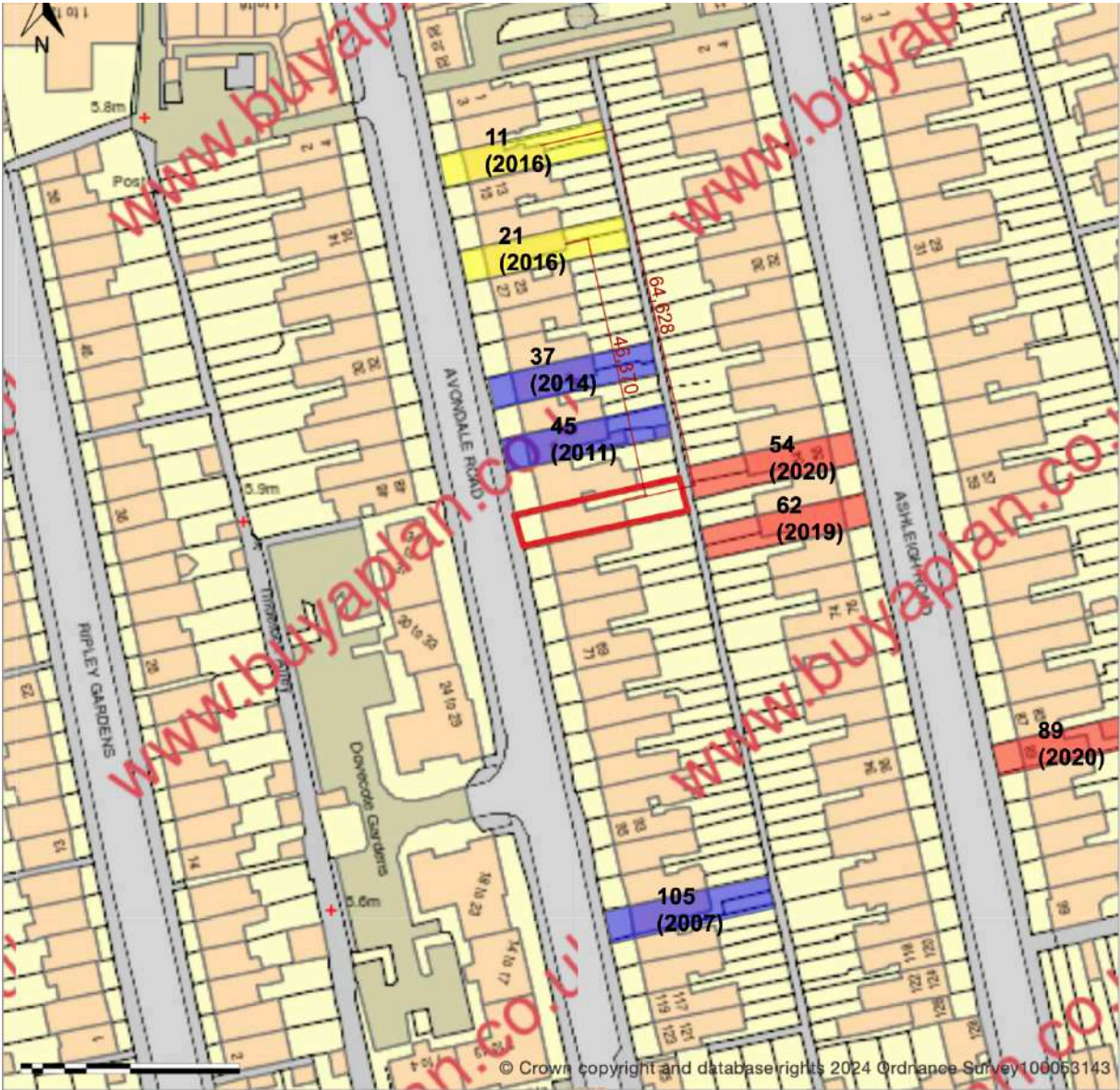


Figure 9: Map of precedents on Avondale and Ashleigh Roads.

## Further Precedent Analysis: West of White Hart Lane Character Area

Avondale Road is one of a group of six roads that makes up the "West of White Hart Lane" character area, defined by the Richmond local authority for planning purposes in their guide "Mortlake Village Planning Guidance". So, whilst there are a number of precedents on Avondale Road, it is wrong to isolate this road as somehow unique and not to consider the precedents in the character area. Indeed, practically all nearby approvals refer to precedents "in the area", not just the same road.

## Cowley Road Precedents

55 Avondale Road is not in a conservation area, but it should be noted that L-shaped dormers have even been consistently approved within the Cowley Road Conservation Area just two roads away (see figure 10).

Appeal: 20 Cowley Road (15/1215/FUL, APP/L5810/W/15/3129317)

An appeal was successfully awarded in 2016, which noted that roof extensions in the vicinity "contribute to the overall character and appearance of **the area** and are a material factor in considering the acceptability of the current appeal proposal." (bold mine).

Following this successful appeal, at least 12 similar L-shaped outrigger dormers have been approved on Cowley Road:

102 Cowley Road (19/0130/FUL)

- 14 An L-shaped dormer was approved on 27/02/19, just after the designation of the Cowley Road Conservation on 20/02/2019.

The officer's report stated that "the changing character of the rear roof slopes in the terrace **and the surrounding area** need to be taken into account" (bold mine). This shows that precedents are not restricted to the same street, but the "surrounding area".

Similarly, the report asserts that "The presence of existing large L-shaped rear dormers on a number of properties on the street sets a recognised precedent for this type of development **in the local area.**" (bold mine).

The report cites the following six "L-shaped" dormer approval precedents:

17/3768/FUL - 46 Cowley Road  
17/2985/FUL - 28 Cowley Road  
17/1764/FUL and 16/1560/HOT - 27 Cowley Road  
16/4842/FUL and 16/3574/HOT - 54 Cowley Road  
16/3629/FUL - 94 Cowley Road  
16/2041/FUL - 21 Cowley Road

It also should have included two further approvals the year before:

18/2722/FUL - 6 Cowley Road  
18/1139/FUL - 8 Cowley Road

Older precedents include nos. 51 and 52 (3/2556/HOT and 08/3001/HOT).

The report concludes that, given these precedents, “a strict application of the House Extensions and External Alterations SPD cannot be sufficiently defended in this case as there are numerous existing valid precedents approved... [and] it must be acknowledged that the primary aim of policies and guidance is above all advisory, and the local context must also be given considerable weight in the assessment. As such, the proposed dormer would be compatible with the local character including the relationship to existing townscape and, the height, massing, and form of existing rear dormers **in the area.**” (bold mine).

116 Cowley Road (20/3325/FUL)

The 2021 officer’s report concluded that, even though the proposal was “out of proportion with the roof... as it would dominate the roof and is not in scale with the host dwelling, there are material considerations to balance against the strict application of policy guidance.”

It continues: “The existing roof alterations in the locality **has changed the character of the area** to such an extent it is difficult for the application to be recommended for refusal. As such, the roof extension is considered acceptable in this instance, as it is in keeping with **the changing character of the area.**” (bold mine). As with the approval for 102, this approval consistently mentions the character of the area, not just the street.

60 Cowley Road (21/0599/FUL)

35 Cowley Road (24/0327/FUL)

Another L-shaped dormer was approved 6 months ago, with the conclusion the same as that for 116 Cowley Road, stating that: “The scale of the dormer is out of proportion... However, the proposal is similar in scale to a number of neighbouring properties within the immediate vicinity and therefore whilst the extensions are not strictly compliant with the councils SPD (House Extensions and External Alterations), as it would dominate the roof and is not in scale with the host dwelling, there are material considerations to balance against the strict application of policy guidance.”

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Figure 10: Twelve L-shaped dormers approved on Cowley Road.

## First and Second Avenues Precedents

A total of 25 properties on First and Second Avenues have had L-shaped outrigger dormers approved, either through planning permission (7) or Lawful Development Certificates (18).

22/1970/PS192 - 52 First Avenue  
20/1459/PS192 - 50 First Avenue  
19/1795/PS192 - 38 First Avenue  
18/0517/PS192 - 61 First Avenue  
17/4376/PS192 - 65 First Avenue  
16/1808/PS192 - 37 First Avenue  
14/4008/PS192 - 48 First Avenue  
13/3459/PS192 - 26 First Avenue

24/0234/HOT - 83 Second Avenue  
22/1351/HOT - 85 Second Avenue  
21/3592/HOT - 57 Second Avenue  
21/2306/HOT - 20 Second Avenue  
21/0710/HOT - 44 Second Avenue  
20/0006/PS192 - 65 Second Avenue  
19/1956/HOT - 5 Second Avenue  
19/0700/PS192 - 28 Second Avenue  
19/0281/HOT - 12 Second Avenue  
18/3907/PS192 - 8 Second Avenue  
16/2500/PS192 - 65 Second Avenue  
15/1751/PS192 - 51 Second Avenue  
13/3566/PS192 - 11 Second Avenue  
13/3448/PS192 - 25 Second Avenue  
13/2723/PS192 - 23 Second Avenue  
13/0719/PS192 - 4 Second Avenue  
12/1818/PS192 - 6 Second Avenue

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8 properties on First Avenue and 10 on Second Avenue (all within the same Local Authority designated character area) have added an L-shaped dormer over the outrigger under Permitted Development without planning permission.

Indeed, it should be noted that this proposal at 55 Avondale Road would be allowable under Permitted Development if the property were a house rather than a flat. Indeed, under Permitted Development, the dormer could potentially extend much further along the outrigger without any additional approval.

In assessing the external character or massing of the building itself, there is no difference relating to whether the building is one property or two, so, whilst it is acknowledged that flats must go through the planning process where houses need not, in this case there is no reason to refuse what could otherwise be done under Permitted Development.



# Approval on Ashleigh Road last month

An L-shaped dormer was approved at 29 Ashleigh Road on 6<sup>th</sup> August 2024.

The report draws the same conclusion as practically every other approval on this group of roads, stating that:

“The scale of the dormer is out of proportion with the roof, covering the entirety of the rear roof slope and part of the roof of the outrigger. However, the proposal is similar in scale to a number of neighbouring properties on Cowley Road, within the immediate vicinity and therefore whilst the extensions are not strictly compliant with the councils SPD (House Extensions and External Alterations), as it would dominate the roof and is not in scale with the host dwelling, there are material considerations to balance against the strict application of policy guidance. The existing roof alterations in the locality has **changed the character of the area** to such an extent that the proposed scheme would not conflict with it. As such, the roof extension is considered acceptable in this instance, as it is in keeping with the **changing character of the area**. This also confirms that the proposal would not result in an incongruous addition to host dwelling or wider locality.” (bold mine).

Of particular note is that the report refers to precedents in Cowley Road to justify the approval in Ashleigh Road. By the same logic, in this application for 55 Avondale Road it is perfectly justifiable to refer to precedents in Ashleigh Road that back directly onto the property, as well as others in “the area”.

It is also noteworthy that the proposal at 29 Ashleigh Road is for a square box dormer 3.7m deep internally along the outrigger (see Figure 11). In contrast, this proposal for 55 Avondale Road is for a much less dominant mansard style dormer (designed to reduce massing and emphasise the roof hierarchy) that only measures 2.8m deep internally along the the outrigger, almost 1m less.



Figure 11: 3.7m box dormer approved on outrigger at 29 Ashleigh Road last month.

**Summary**

Practically all approvals on neighbouring roads talk about precedents in “the local area” changing “the character of the local area.”

The council has itself defined “character areas” within Mortlake and has produced a document specifically for planning guidance based on these areas called “Mortlake Village Planning Guidance.” In this, Avondale Road forms part of Character Area 2: “West of White Hart Lane”. This character area consists of six parallel residential roads: Ripley Gardens, Avondale Road, Ashleigh Road, Cowley Road, Second Avenue and First Avenue (see Figure 12).

This is a small and well defined character group and so precedents in these specific neighbouring roads are clearly relevant for planning purposes. Isolating Avondale Road for special treatment while approving numerous similar proposals in the next couple of roads would be unjustifiable. Even Cowley Road, which is a conservation area, has not been singled out and has had multiple approvals in the last few years.

In total we have identified 5 precedents on Avondale Road, 6 on Ashleigh Road, 12 on Cowley Road, 17 on Second Avenue and 8 on First Avenue. This is a total of 48 precedents in the character area as defined for planning purposes by Richmond local authority.

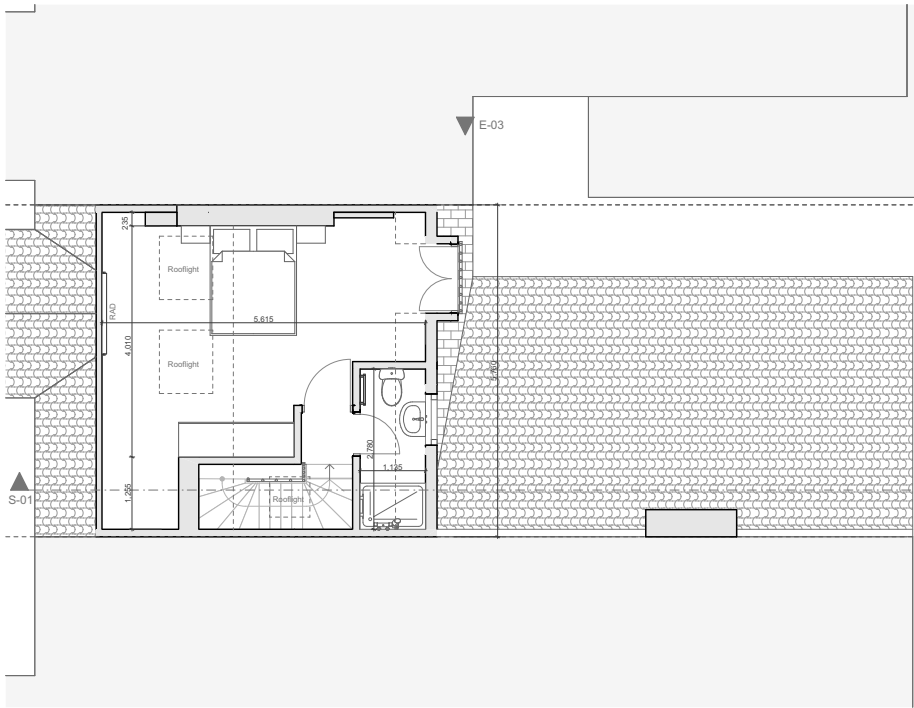
We believe that, having approved 48 others on this set of six small roads, and having consistently acknowledged in those decision reports that the character of the area has changed to include these dormer extensions, it would only be fair and consistent to approve this proposal.

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Figure 12: The West of White Hart Lane Character Area (source: ‘Mortlake Village Planning Guidance’).

## **Proposal Drawings**



02-Second Floor  
1:50

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**KEY:**  
 SD Smoke Detector  
 HD Heat Detector  
 EF Extractor Fan  
 RAD Radiator  
 MHC Man Hole Cover  
 SVP Soil Vent Pipe  
 RWP Rain Water Pipe

Scale 1:50  
 0 0.1 0.5 1 2m  
 N

Rev	Issue	Transmittal Set Name	Issue Date	Issue Title	Status	Approved by

Scales @ A3  
 1:50      24/09/2024      1023

**Client Approval**  
 A - Approved  
 B - Approved with Comments  
 C - Do Not Use

Status: **S0** Purpose of Issue: **Planning**

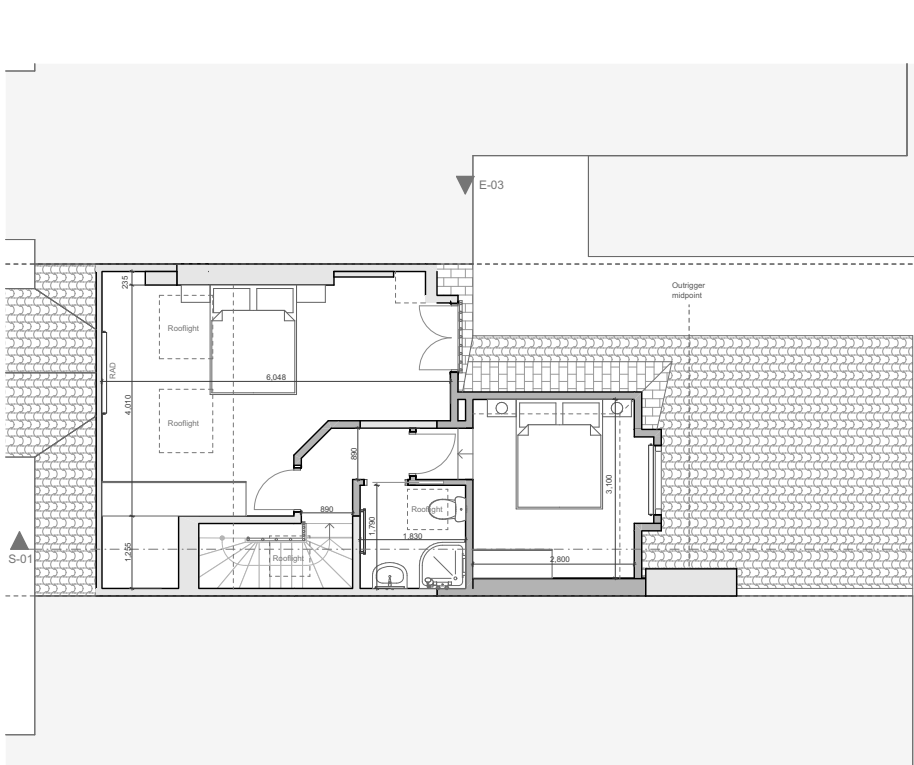
Architect: **Robert Poll RIBA**  
 contact@kingstonarchitects.com  
 Vine House 143 London Road  
 Kingston upon Thames KT2 5NH UK

Project: **Avondale Road**  
 55 Avondale Road Mortlake SW14 8PU  
 UK

Layout Title: **02-Second Floor Existing**

Client: \_\_\_\_\_

Project	Originator	Volume	Level	Type	Code	Number	Rev
1025	RP	XX	01	DR	A	0102	



02-Second Floor  
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Architect: **Robert Poll RIBA**  
 contact@kingstonarchitects.com  
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Project: **Avondale Road**  
 55 Avondale Road Mortlake SW14 8PU  
 UK

Layout Title: **02-Second Floor Proposed**

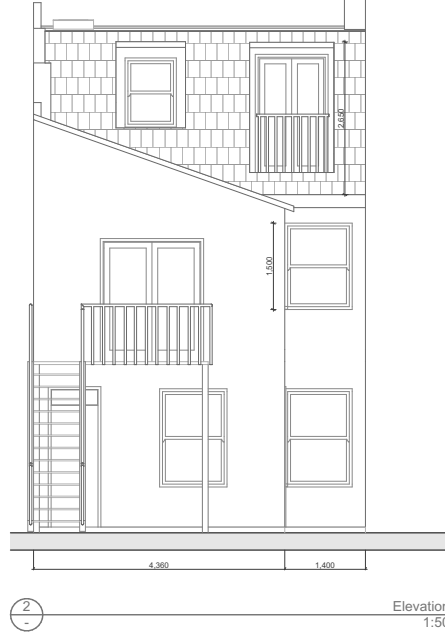
Client: \_\_\_\_\_

Project	Originator	Volume	Level	Type	Code	Number	Rev
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Figure 13: Second floor plan (existing).  
 Figure 14: Second floor plan (proposed).



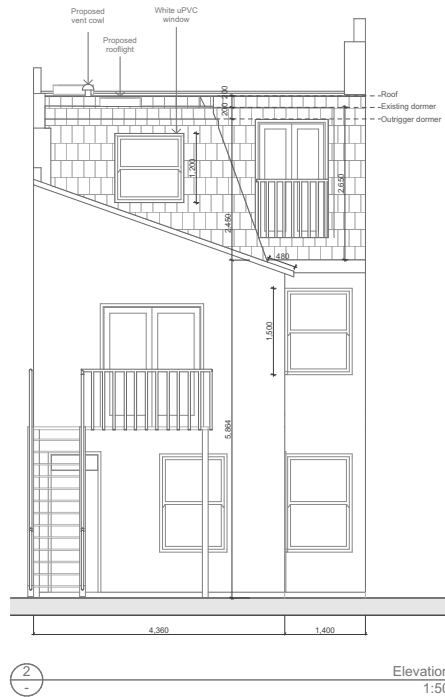
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Project **Avondale Road**  
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 UK

Layout Title **E-01-02 Elevation Existing**

Client

project	originator	volume	level	type	code	number	rev
1025 - RP - XX - ZZ - DR - A -						0250	

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RevID	RevDate	Transmitted Set Name	Issue Date	Issue Title	Status	Approved by
1:50			24/09/2024			1023

Scales @ A3 Date of issue Project No.

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Project **Avondale Road**  
 55 Avondale Road Mortlake SW14 8PU  
 UK

Layout Title **E-01-02 Elevation Proposed**

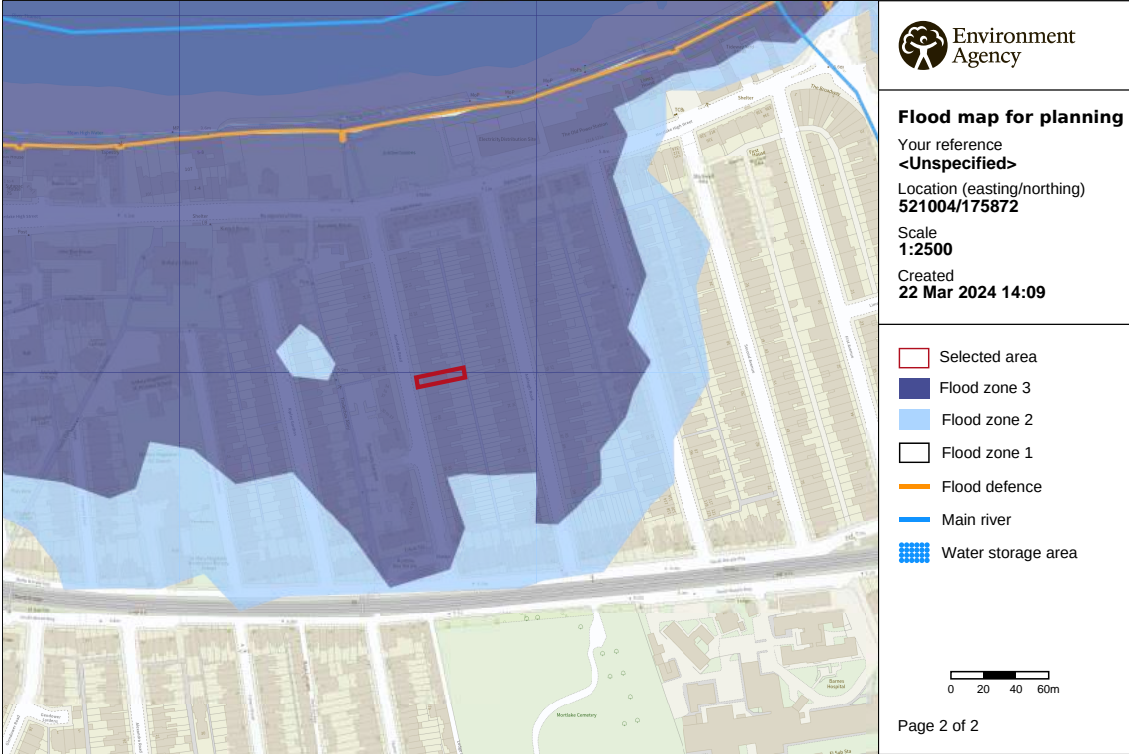
Client

project	originator	volume	level	type	code	number	rev
1025 - RP - XX - ZZ - DR - A -						0275	

Figure 15: Front and rear elevation (existing).  
 Figure 16: Front and rear elevation (proposed).



# Flood Risk Assessment



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The property is within Flood Zone 3, which has a high probability of flooding. The property is served by a flood defence as shown on the Environment Agency map.

55 Avondale Road is a first and second floor maisonette. The only part of the property at ground level is the entrance staircase.

The proposal is to extend the second floor over an existing first floor roof, so the footprint of the property does not change and the ground floor is not impacted in any way.

The proposal will not add to existing levels of rainwater discharge onto hard surfaces or into surface water drainage systems. It will not obstruct flows of potential flood water and there is no impact on safety for residents or the community in the event of a flood.

Figure 19: Flood risk map (Environment Agency) (NTS).

## Householder and other minor extensions in Flood Zones 2 and 3

**This guidance is for domestic extensions; and non-domestic extensions where the additional footprint created by the development does not exceed 250 square metres. It should NOT be applied if an additional dwelling is being created.**

We recommend that:

### Planning Authorities

- 1) Refer the applicant to the standing advice pages on the Environment Agency website or provide them with a copy of this page for them to include as part of the planning application submission.
- 2) Check the planning application to ensure that one or other of the mitigation measures from the table below has been incorporated.

**Applicants** complete the table below and include it with the planning application submission. The table, together with the supporting evidence, will form the Flood Risk Assessment (FRA) and will act as an assurance to the Local Planning Authority that flood risk issues have been adequately addressed. Print<sup>1</sup> the completed form to a PDF writer if submitting this form electronically.

Applicant to choose one or other of the flood mitigation measures below	Applicant to provide the LPA with the supporting information detailed below as part of their FRA	Applicant to indicate their choice in the box below. Enter 'yes' or 'no'
Either ;  Floor levels within the proposed development will be set no lower than existing levels AND, flood proofing of the proposed development has been incorporated where appropriate.	Details of any flood proofing / resilience and resistance techniques, to be included in accordance with ' <i>Improving the flood performance of new dwellings</i> ' CLG (2007)	<b>YES</b>
Or;  Floor levels within the extension will be set 300mm above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year. This flood level is the extent of the Flood Zones	This must be demonstrated by a plan that shows finished floor levels relative to the known or modelled flood level. All levels should be stated in relation to Ordnance Datum <sup>1</sup>	

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### Subterranean/basement extensions

Due to the risk of rapid inundation by floodwater; basements should be avoided in areas at risk of flooding.

The LPA may hold additional guidance for basement extensions.

Self-contained basement dwellings are 'Highly Vulnerable' development and should not be permitted in flood zone 3. We are fundamentally opposed to these developments.

**Continued...**

<sup>1</sup> Ordnance Datum or the abbreviation 'OD' is the mean level of the sea at Newlyn in Cornwall from which heights above sea level are taken. The contour



## Cumulative impact of minor extensions and the removal of Permitted Development rights.

PPS25 paragraph D16 highlights the potential for the cumulative impact of minor extensions to have a significant effect on flood risk. Where local knowledge (Strategic Flood Risk Assessment held by the LPA/information provided by the parish council) suggests this is the case the guidance contained in FRA guidance note 2 should be applied<sup>2</sup>. FRA guidance note 2 can also be applied where permitted development rights have been removed for flood risk reasons. The Environment Agency does not usually comment on minor development in this category.

### Permeable paving and changes to permitted development rights for householders

On the 1<sup>st</sup> October 2008 the General Permitted Development Order (GPDO) in England was amended by the Government (Statutory Instrument 2008 No. 2362).

One of the changes introduced by the GPDO amendment is the removal of permitted development rights for householders wishing to install hard surfacing in front gardens which exceeds 5 square metres (i.e. 1m x 5 m) without making provision to ensure permeability. This means that use of traditional materials, such as impermeable concrete, where there is no facility in place to ensure permeability, requires an application for planning permission.

In order to help and advise householders of the options for achieving permeability and meeting the condition for permitted development status the Department for Communities and Local Government (CLG) has produced guidance on permeable paving which can be found on the following link <http://www.communities.gov.uk/publications/planningandbuilding/pavingfrontgardens>.

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The Environment Agency support this change to the GPDO as it is in line with the recommendations of the Pitt Report regarding the need to better tackle the impact of surface water flooding. However, Local Planning Authorities should determine these applications in accordance with the CLG guidance **without** consulting the Environment Agency.

**End of comment**