



# ET Planning

## Planning Statement

## 2 Verdun Road

London SW13 9AY

*Amalgamation of two dwellings into a single family, 4 bedroom dwelling; alterations to existing rear dormers; addition of front porch; addition of side entrance door; and conversion of single garage into a garden room.*

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# 1. Introduction

- 1.1 This statement is produced to support a planning application for the amalgamation of two dwellings into a single family, 4 bedroom dwelling; alterations to existing rear dormers; addition of front porch; addition of side entrance door; and conversion of single garage into a garden room.
- 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 plans prepared by deUNIT.
- 1.4 The relevant application fee will be submitted by the applicant separately.

## 2. Site Location and Description

- 2.1 The application site comprises no.2, three storey end of terrace dwellings, with one (2 Verdun Road) located on the Eastern side of Verdun Road, accessed via a front door on the principal elevation. The adjoining dwellinghouse, (70 Ullswater Road) is situated on the Northern side of Ullswater Road, with access awarded via the rear garden of the dwelling.
- 2.2 The dwellinghouses are situated on modest plots, with both benefitting from sizeable rear gardens, commensurate with the size of the dwellinghouse. The surrounding character of the area is predominantly residential, with dwellings that vary in architectural design and built form.
- 2.3 The site is not located within an AONB, nor is it located within the Green Belt, SAC, SPA or SSSI. The closest SSSI designation is located circa 450m East of the site which is the Barn Elms Wetland Centre. Additionally, the site is located within Flood Zone 3 which carries a high probability of flooding from rivers and the sea.

## 3. Planning History

2 Verdun Road:

- 3.1 Application Ref 05/0478/FUL – *'Existing side extension (built onto the side of no. 2) to become a separate dwelling with entrance onto Ullswater Road.'* Granted 22/04/2005.
- 3.2 Application Ref 04/2541/FUL – *'Existing side and rear extension to become a separate dwelling with entrance onto Ullswater Road'.* Refused 27/09/2004.

- 3.3 Application Ref 97/1783 – ‘*Roof Extension*’. Granted 05/12/1997.
- 3.4 Application Ref 89/0813/FUL – ‘*Single Storey Rear Extension, Two Storey Side Extension And Rear Dormer Extension*’. Granted 31/05/1989.

## 4. Development Proposals

- 4.1 The National Design Guide (2019) identifies that “well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time” (para 120-121).
- 4.2 Regarding the requirements of NPPG Paragraph: 029 Reference ID: 14-029-20140306 in respect of Design and Access Statements, the proposal is described as follows:
- 4.3 **Use and Amount:** The proposed use is for the amalgamation of two dwellings into a single family, 4 bedroom dwelling; alterations to existing rear dormers; addition of front porch; addition of side entrance door; and conversion of single garage into a garden room.
- 4.4 **Layout and Scale:** The proposal dwelling will be three storeys in built form, with a modest 96.4sqm rear garden that is commensurate with the size of the proposed 4-bedroom dwelling.
- 4.5 On the ground floor, an extension to the existing single storey porch on the principal elevation is proposed. It currently has a GIA of 3.4m, increasing by approximately 2 metres. This will improve the access

to the proposed dwelling, located on the Eastern side of Verdun Road. Internal rearrangements will result in a large kitchen/diner to the rear of the property, with a GIA of 40.1sqm, a modest living room, study, wc and utility which provides the residents with ample private indoor amenity space. A proposed side entrance door will be located on the Southern facing elevation, accessed on the Northern side of Ullswater Road. The existing garage of 2 Verdun Road will be converted into a gym with associated shower room. The existing garage of 70 Ullswater Road will remain as a garage, providing secure, off-street parking, utilising the existing garage access already observed at the site. No.2 secure cycle storage racks and refuse will be located adjacent to the proposed gym room.

- 4.6 On the first floor, no.3 double bedrooms will be located, with a large bathroom. Bedroom 2 will further benefit by having an en-suite. The master bedroom will be located on the second floor with an en-suite and dressing room. The rear dormers on the second floor are to be repaired and retiled and there will be a small dormer addition connection to the existing dormers, with a GIA of 1 sq m.
- 4.7 The existing dwellinghouse at 2 Verdun Road has a GIA of 114sqm (excluding outbuilding) whilst the existing dwelling at 70 Ullswater has a GIA of 62sqm (excluding outbuilding). The amalgamation of the two, with associated works will result in a dwellinghouse with a GIA of 184sqm (excluding outbuildings).
- 4.8 **Landscaping:** The application site benefits from two modest rear gardens, commensurate with the size of the two dwellings. The proposed amalgamation would see the creation of a sizeable rear garden whereby the landscaping currently at the site would be protected and retained throughout the development. The existing trees at the site will also be retained and protected during the construction phase. New planting can be accommodated within the

curtilage of the site via condition; however the site already benefits from ample vegetation so this is not foreseen to be necessary.

- 4.9 **Appearance:** The majority of the proposed development does not involve external works, therefore the streetscene will remain largely unaltered as a result of this proposal. The proposed porch will consist of brickwork that matches the main dwellinghouse, with red roof tiles. The rear dormers are to be repaired and retiled. The proposed rooflights will be of a grey metal material which would improve the architectural aesthetic of the dwellinghouse and would match neighbouring dwellings.
- 4.10 **Access & Parking:** The site would utilise the existing parking arrangements, with the garage of 70 Ullswater Road remaining as a garage. This will continue to be accessed via the access gates on the Northern side of Ullswater Road.

## 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 123 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 131 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 139 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 **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.
- 5.7 All planning applications should be dealt with in accordance with the relevant development plan policies unless material considerations indicate otherwise. The NPPF is a material planning consideration in all planning applications. In this instance, the relevant development plan documents include:



- Richmond Local Plan (Adopted 2018)
- London Plan (Adopted 2021)

5.8 The site is located within the settlement boundary, within an existing recognised residential street where residential development is channelled towards. The site already consists of two dwellinghouses therefore the principle of development has been established in this regard.

5.9 London Plan **Policy H2: Small Sites** determines that boroughs should endorse well-designed new homes on small sites in order to significantly, “diversify the sources, locations, type and mix of housing supply.”

5.10 The proposal complies as it represents a ‘well-designed’ home, which the two dwellinghouses it will replace could not achieve, due to substandard accommodation in regard to space standards. Furthermore, the amalgamation provides a valuable contribution to the diversifying housing mix and provides a 4-bedroom family dwellinghouse. Therefore, the proposal is in line with the London Plan and national aspirations for achieving diverse neighbourhoods that cater to a mixture of tenures, whilst providing a needed family dwellinghouse.

5.11 Local Plan **Policy LP 38: Loss of Housing** 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.*

- 5.12 Whilst the amalgamation of two dwellinghouses into one would result in the loss of residential housing, the existing dwelling at 70 Ullswater Road is of a size that hinders the resident's internal amenity. The proposed dwellinghouse, provides ample internal and external amenity space that will be sustainability beneficial for residents in the present and the future.
- 5.13 The existing dwellinghouse of 2 Verdun Road has a GIA of 114sqm whilst 70 Ullswater Road has a GIA of 62sqm which is drastically below the Nationally Described Space Standards and would not be granted permission when assessed against current planning policy. This further justifies the loss of a dwellinghouse in this location, as the dwellinghouse that is to be lost (70 Ullswater Road), significantly fails to comply with planning policy. The current arrangement at the site, reflects a dwellinghouse that significantly harms the amenity of its residents which demonstrates the need for this proposal.
- 5.14 With reference to criterion a), it has been clearly demonstrated that the existing housing is incapable of improvement or conversion to a **satisfactory standard.**
- 5.15 Criterion b) pertains that the scheme should have no adverse impact on the character of the area. The proposed development involves little external alterations with no structural changes to the building and relates predominantly to internal layout changes that will arise from the amalgamation of the ground, first and second floor, into 1no. residential dwellinghouse. Therefore, no additional impact will be generated.
- 5.16 Criterion c) states that where the proposed *development "provides a reasonable standard of accommodation, including accessible design,*

*as set out in LP35*”, redevelopment is acceptable. As stated above, the amalgamation into 1no. dwellinghouse as opposed to 2no. dwellings meets a high standard of accommodation in line with National and London Plan space standards, where the previous arrangement failed to do so. Overall, the proposal is entirely policy compliant and satisfies Policy LP 38.

- 5.17 **Character and Appearance of the Area:** Local Plan **Policy LP1: Local Character and Design Quality** ensures The Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. The policy continues by adding development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.
- 5.18 London Plan (2021) **Policy D4: Delivering Good Design** ensures development delivers high quality design and place making with **Policy D3: Optimising Site Capacity Through the Design Led Approach** ensuring what development proposals should do in regard to form and layout, experience and quality and character.
- 5.19 Policy D3 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 amalgamating the two dwellinghouses into one meets these aspirations by providing a 4-bedroom family dwellinghouse on an existing residential site, that sufficiently meets the space standards. Therefore, making more efficient use of the space on site.

- 5.20 The proposed single storey porch is moderate in terms of scale, footprint and built form within the context of the host dwellinghouse. Both the porch and replacement dormer will comprise of materials that match the existing dwellinghouse and are considered to be of high-quality design that will enhance the architectural merit of the local area whilst being a scale and density that is in keeping with the existing character of the area. The proposed replacement rear dormers respect the building line and height of the dwelling, and does not exceed the highest ridge height thus conforming to the original dwelling.
- 5.21 Due to the majority of works taking place to facilitate the amalgamation taking place internally, the streetscene will remain largely unaltered as a result of this proposal. Therefore the proposal is considered to be fully compliant with Local Plan Policy D4 and London Plan Policy D3 and D4.
- 5.22 **Residential Amenity:** Local Plan **Policy LP8: Amenity and Living Conditions** ensures all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. Design must allow for good daylight standards, avoid overlooking or noise disturbance, avoid visual intrusion, overbearing impacts or harm to the reasonable enjoyment of the uses of buildings and gardens.
- 5.23 The proposed amalgamation results in a private outdoor amenity area of 96.4sqm to ensure occupants of the dwelling have a more than adequate, quality space for outdoor seating and recreation. Furthermore, the proposal does not involve any extensions to the dwelling, therefore the separation distances remain unaltered as a result of this proposal and is therefore considered to not harm the amenity of the neighbouring residents.

- 5.24 The only proposed external additions to the site is the proposed porch on the principal elevation. The proposed porch is of a scale and size that would not adversely impact the neighbouring dwelling above that which is already present at the site with respect to loss of light, overshadowing or overlooking and is therefore considered to be policy compliant.
- 5.25 It is acknowledged that the proposed amalgamation results in no physical alterations to the structure of the building, that would result in the creation of an imposing form, or loss of light. Further to this, no additional first-floor windows have been inserted, that could create direct sightlines into habitable rooms.
- 5.26 **Policy LP 35: Housing Mix and Standards** 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.
- 5.27 London Plan **Policy D6: Housing Quality and Standards** and Local Plan **Policy LP 35: Housing Mix and Standards** also require amenity space to be provided. The below table illustrates the national and local space standards compared with the proposed development.

**Table 3.1 - Minimum internal space standards for new dwellings<sup>4</sup>**

Type of dwelling	Minimum gross internal floor areas* and storage (square metres)					
	Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p		39 (37) *	N/A	N/A	1
	2p		50	58	N/A	1.5
2b	3p		61	70	N/A	2
	4p		70	79	N/A	2
3b	4p		74	84	90	2.5
	5p		86	93	99	2.5
	6p		95	102	108	2.5
4b	5p		90	97	103	3
	6p		99	106	112	3
	7p		108	115	121	3
	8p		117	124	130	3
5b	6p		103	110	116	3.5
	7p		112	119	125	3.5
	8p		121	128	134	3.5
6b	7p		116	123	129	4
	8p		125	132	138	4

*Figure 1: Residential Development Standards and Room Sizes  
(London Plan, 2021).*

- 5.28 As illustrated in the submitted proposed plans that accompany this submission, the GIA of the proposed 4-bedroom dwelling is 184sqm (excluding outbuildings). This clearly exceeds the 130 sqm minimum requirement for a 3 storey, 4-bedroom/ 8 person dwellinghouse and demonstrates the proposed development exceeds the requirements of the London Plan and Policy LP 35.
- 5.29 **Trees and Landscaping:** Local Plan **Policy LP 16: Trees, Woodland and Landscape** seeks to protect existing trees and important existing landscape features, as well as encouraging new planting. London Plan **Policy G7: Trees and Woodlands** indicates that proposals should ensure where possible, existing trees of value are retained. No trees need to be removed to facilitate the proposal with existing landscaping to be protected throughout, therefore there will be no adverse impact on the landscape as a result.
- 5.30 An Arboricultural Impact Assessment has been prepared by Trevor Heaps Arboricultural Consultancy Ltd for the site. The AIA concludes that no vegetation will need to be removed to facilitate the works. The retained / third-party trees will be protected using up-to-date methodology and guidance provided by the current British Standards (BS 58378:2012). The trees do not cause any significant conflicts in terms of construction activities, nor will any significant issues of post-development pressure be likely to emerge that could not be managed with routine, minor tree maintenance.
- 5.31 **Transport and Parking:** Paragraph 115 of the NPPF sets out the test that a determining authority should apply when determining the suitability of a planning application in terms of transport and highways stating that; 'Development should only be prevented or

refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

- 5.32 The London Plan, in **Policy T1: Strategic approach to transport**, requires the majority of trips in London to be made by foot, cycle or public transport. London Plan **Policy T6: Car Parking** sets out in Table 10.3 that residential development in Outer London PTAL Zone 2 (the sites PTAL output), should provide up to 1 space per 3+ bed dwelling. This proposal results in a secure, off-street parking arrangement for no.1 vehicle so is therefore policy compliant in this regard.
- 5.33 **Policy LP 44: Sustainable Travel Choices** 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. The proposal creates a secure cycle store to the rear of the site for no.2 cycles, so its therefore considered to be policy compliant in this regard.
- 5.34 The reduction in the number of units also ensures that there would be a reduction in the number of households and therefore a likely reduction in the number of trips from the property, resulting in a negligible or positive impact on the road network, in line with National policy.
- 5.35 A transport statement technical note accompanies this submission, prepared by Kronen which concluded that based on the above the proposal's vehicle parking, cycle parking and refuse servicing arrangements are considered acceptable/ not objectionable.
- 5.36 The technical note continues further to add with regards to transport impacts Paragraph 115 of the "National Planning Policy

Framework" includes direction of only preventing or refusing development on transport grounds where "there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". The proposals are not considered unacceptable/ severe in this context and is therefore considered not objectionable in a planning context.

- 5.37 **Refuse Provision:** Refuse arrangements are to remain as existing with a refuse store area at the rear of the site. Therefore, the development will be in accordance with the London Plan and Policy **LP 24**, relating to waste collection.
- 5.38 **Drainage and SuDS:** Local Plan Policy **LP 21: Flood Risk and Sustainable Drainage** refers to flood risk and sustainable drainage.
- 5.39 London Plan **Policy SI 12** (Flood Risk Management) and **Policy SI 13** (Sustainable Drainage), 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. As the site is situated within Flood Zone 3, a Flood Risk Assessment (FRA) accompanies this submission, prepared by deUNIT.
- 5.40 The FRA concluded that although the site is located within Flood Zone 3, with a high probability of flooding, it benefits from the existing flood defences. Flooding map from rivers and sea, as well as surface water flood risk map indicate very low chance of flooding. In addition, the proposed ground floor level will be retained as existing.
- 5.41 **Noise:** London Plan **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**.



5.42 **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 the proposed development is a low intensity, residential use and will not amount to any additional noise generation from the existing arrangement. Therefore, it is in full compliance with Policy D13 and D14.

5.43 **Sustainability and Energy:** Local Plan Policy **LP 22: Sustainable Design and Construction** requires developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change. Minor residential schemes must aim to achieve a 35% reduction in carbon dioxide emissions. This should be measured against the 2021 Building Regulations baseline. This application is accompanied by an energy statement, prepared by Base Energy.

5.44 The design of the development will incorporate energy efficient building fabric and services to low carbon technology. Aforementioned services includes the following;

- Thermal specification meeting and exceeding Part L 2021 notional U-values
- A design which limits air permeability
- A design which limits thermal bridging
- Energy saving building services including low energy lighting and heating controls.
- Low carbon Air Source Heat Pump

5.45 The energy statement concluded that the proposed development will be designed to limit energy demand through the inclusion of a

thermally efficient building fabric and energy efficient services with low carbon technology will be incorporated and is to comprise of an Air Source Heat Pump. This results in a total 49% reduction in CO2 emissions Kg/year over Part L 2021.

- 5.46 The proposal is therefore considered to comply with sustainability objectives in this respect.
- 5.47 **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.
- 5.48 London Plan **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.
- 5.49 In this instance, the proposal relates to the amalgamation of two units into 1, with the only breaking of ground taking place to facilitate a 3.4sqm porch. Issues of biodiversity are therefore unaffected from the existing situation.
- 5.50 **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.
- 5.51 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. The assessment determined that the scheme can be considered policy

compliant, without an additional contribution towards the provision of any affordable housing.

- 5.52 **Community Infrastructure Levy:** The relevant forms have been completed and submitted as part of this application.
- 5.53 **Other Material Considerations:** To justify the loss of housing, attention should be made to a recently submitted application in Richmond (reference 23/2729/FUL) which saw the granting of the proposed amalgamation of the first-floor studio flat and second floor x1 bedroom self-contained flats to form 1 x 2-bedroom self-contained flat.
- 5.54 Within the principle of development section of the Delegated Report of application 23/2729/FUL, the Officer makes reference to one of the units being of a substandard size. This is of relevance to this application as 70 Ullswater Road fails to meet Nationally Described Space Standards.
- 5.55 The Officer concludes by adding; *“with reference to criterion a), although the proposal would result in the net loss of one dwelling, this dwelling was substandard with inadequate amenities and the resultant single dwelling will meet the space standards appropriately. Criterion b) states that the scheme should have no adverse impact on the character of the area. The statement outlines that the proposed development involves no external alterations or structural changes to the building and relates only to internal layout changes that will arise from the amalgamation of the first and second floor into one residential flat. Therefore, no additional impact will be generated. Criterion c) states that where the proposed development “provides a reasonable standard of accommodation, including accessible design, as set out in LP35”, redevelopment is acceptable. As stated above, the amalgamation into one flat as opposed to two*

*flats, meets a high standard of accommodation in line with National and London Plan space standards, where the previous arrangement failed to do so. Overall, the proposal satisfies the requirements of Policy LP38.”*

- 5.56 The loss of a dwelling that does not meet Nationally Described Space Standards has been justified by the Council, as long as it meets the three criteria. As aforementioned within this statement, this proposal meets the 3 criteria, so this development is acceptable in this regard.

## **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. As set out in detail in this report, the proposed development would create a high standard of accommodation, greatly improving upon the current situation and without adverse effect on the character of the area, 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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