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PLANNING

**Planning Statement in Support of a
Proposed Residential Development
at:**

361 – 367a
St. Margaret's Road
Twickenham
TW1 1PP

SM/CJ/4577/St.MargaretsRoad/SPS

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1.0 Introduction

1.1 Cunnane Town Planning LLP has been instructed by Beachview Properties Limited to submit a planning application seeking permission for a residential development at 361-367a St. Margarets Road, Twickenham.

1.2 The proposed scheme would provide an opportunity to re-develop the existing under-utilised buildings and land and provide a development that would integrate with the surrounding residential area.

1.3 This supporting statement will provide a description of the site and the surrounding area, provide a planning history of the site, refer to the relevant planning policies that pertain to the site and, finally, demonstrate that the proposed development is in compliance with these policies and would result in a sustainable development that would enhance the site and the surrounding area.

2.0 Site and Surrounding Area

- 2.1 The site is located on St. Margaret's Road, not far from the centre of St. Margaret's in the Borough of Richmond. The site is located a similar distance from the town centres of Twickenham and Richmond with frequent bus services located along St. Margaret's Road linking the two centres.
- 2.2 The area where the application site is located is characterised by 2 storey Victorian style residential properties. This style of housing is located along the whole of St. Margaret's Road and the subject site, a block of post war flats, is quite different in terms of its style, layout and scale. The property adjacent to the site, no. 359, is screened from the building by virtue of a number of tall trees and only a single window looks out onto the subject site but this appears to serve a non-habitable room. No. 377 comprises a 2 storey house with a garage incorporated as part of the building.
- 2.3 Located to the north of the site is a small parade consisting of both retail and residential properties. The retail units include a flower shop, a vehicle sales unit, a sandwich shop and a convenience shop.
- 2.4 The application site has an area of 0.18 hectares and is occupied by a vacant 3 storey building providing 11 two bedroom flats. There are two outbuildings located in the north eastern and south western corners of the site that appear to have been previously used as storage areas for the previous residents. 367a St. Margaret's Road, which is attached to the larger building, extends further to the road and there are 2 separate flats within this building, one on the ground floor and another on the first floor.
- 2.5 The properties located to the rear of the subject site are all 2 storeys in height and benefit from gardens approximately 20 metres long. The building situated on site can only be seen from Haliburton Road by virtue of the spaces between these semi-detached houses.

2.6 Located on the opposite side of St. Margaret's Road is the Marie Rambert Centre, which is a ballet school and is part of Brunel University Campus. Located in close proximity to this school is St. Margaret's Lodge. Both of these buildings are screened behind a 4 metre high red brick wall and cannot be seen from the roadside.

2.7 According to the London Borough of Richmond upon Thames (LBRuT) Unitary Development Plan First Review 2005 Proposals Map the site does not fall within a designated use. It is located just outside the St. Margaret's Conservation Area and just within the Richmond Borough boundary. However, the map does show that the site is within an area that is deficient of public open space.

2.8 The site is located approximately 1.5 km from the nearest train station, which is St. Margarets and is of a similar distance from Isleworth train station located within the Borough of Hounslow. The site does not benefit from a varied range or frequency of public transport services.

2.9 None of the buildings on site are listed or designated as a Building of Townscape Merit (BTM) and there are no Tree Preservation Orders (TPO) or Compulsory Purchase Orders (CPO) in force in relation to the site.

3.0 **Planning History**

3.1 There is no relevant planning history pertaining to this site.

4.0 Planning Policies and Government Guidance

4.1 The Development Plan for this area includes the London Borough of Richmond upon Thames (LBRuT) Unitary Development Plan First Review 2005 (UDP), adopted in March 2005, and the London Plan, adopted in February 2004. The following policies are considered relevant:

4.2 London Borough of Richmond upon Thames Unitary Development Plan First Review 2005

Policy	Description
ENV 34	This policy refers to the protection of the floodplain and states that within the area liable to flood, as shown on the proposals map, development will not be permitted unless it can be demonstrated to the Council that the proposal would not increase impedance to the flow of floodwater; reduce the site’s contribution to the capacity of the floodplain to store water; or increase the number of properties or people at risk from significant adverse effects of flooding.
BLT 11	The Council will require a high standard of design in new buildings while ensuring that schemes are compatible with the scale and character of existing development. Such factors as layout and access arrangements; height; form; frontage; and building materials and colour will all be taken account of by the Council when considering planning applications.
BLT 15	The Council will seek to ensure that the design and layout of buildings enables sufficient sunlight/daylight to penetrate into and between buildings, and that adjoining land or properties are protected.
BLT 16	This policy seeks to ensure that adjoining properties do not suffer from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance as a result of new developments.

- BLT 18** Buildings that are higher than the general height of surrounding buildings will not normally be permitted.
- TRN2** The Council will only permit new development where it can be demonstrated that the transport infrastructure can accommodate it, or be adapted to do so, without creating congestion or hazards on the road network. New development should provide for the needs of disabled people, pedestrians and cyclists; make provision for short direct links to public transport; and be acceptable in terms of traffic generation and traffic impact on the road network.
- TRN 4** Maximum car parking standards are set for all types of development and the Council will also expect appropriate provision for people with disabilities and cycle parking.
- HSG 2** Existing housing should be retained and where necessary rehabilitated except where redevelopment would provide substantial housing gain.
- HSG 4** In areas which are predominantly residential in use, priority will be given to the provision of additional housing so long as it does not have an adverse effect on the character of the area.
- HSG 6** The Council expects that any new development on sites capable of providing 10 or more units or of 0.3 hectares or more in area will be required to provide 40% of the total number of units proposed as affordable housing. The policy goes further to state that, in exceptional circumstances, the Council may consider a financial contribution to its affordable housing fund as an alternative to on-site provision.
- HSG 8** On developments of 10 or more units, 10% of the units proposed should be specifically designed for, or capable of easy adaptation to, wheelchair housing.

HSG 11 The Council will seek an appropriate density and mix of dwelling sizes for proposed developments and will take into account the need to use the land in question as intensively as is compatible with the protection of the quality, character and amenity of the area. The Council will also require 25% of the proposed units to be small units i.e. 1 bedroom or studio flats.

Parking Standards The Council's car and bicycle parking standards are as follows:

Residential: Vehicle Parking

1-3 bedrooms - Maximum of 1 space per unit

Residential: Cycle Parking

1-3 bedrooms - 1 space (min) per unit

4.3 Supplementary Planning Guidance (SPG)

The **Design for Maximum Access SPG** provides guidance on the provision of facilities for those with restricted mobility as part of proposed housing developments. Such matters as parking, the pedestrian environment, entrances to buildings, toilets and signing are all referred to in this document and provide information regarding the needs of all types of disabled people such as those that are visually impaired, deaf/hard of hearing and users of wheelchairs/prams/buggies.

The **Recycling for New Developments SPG** provides guidance on the provision of recycling facilities which the Council expects to be provided in new developments of at least 6 units. It states that for developments of between 6 and 11 units 5 bins of 240 litres capacity each should be provided to store newspapers and magazines, green glass, brown glass, clear glass and tins/cans. Storage bins should be located within 10 metres wheeling distance of the road and at ground level. They should also be located within an enclosed area so as to prevent the spread of rubbish.

4.4 Supplementary Planning Document (SPD)

The **Small and Medium Housing Sites SPD** is an adopted planning document and is a material consideration in the Council’s determination of planning applications and may be used to refuse an inappropriate or poorly designed development. This SPD concerns residential development only and applies to small and medium housing sites including ‘infill’ and ‘backland’ developments, one-off housing and the intensification of sites for apartments. It discusses such issues as residential character, including the components of character and types of residential character, and issues such as residential amenity and adaptability in the designing of new homes.

The **Design Quality SPD** provides the framework for all local design guidance in the Borough. It focuses on the general principles of design quality in all new built development in the Borough’s towns and villages. It discusses issues such as character, public realm, ease of movement and diversity. The guidance also has four main objectives namely positive promotion, design management, procedural assistance and design review which the Council uses to recognise best practice in design.

4.5 The London Plan

Policy	Description
2A.1	The Mayor will seek the optimisation of the use of previously developed land, a design led approach to optimise the potential of sites that developments occur in areas which are accessible by public transport, walking and cycling and that they occur in locations that are accessible to town centres.
3A.3	Boroughs should promote the efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings.
3C.22	The Mayor will seek to ensure that on site parking for developments is the minimum necessary and that there is no overprovision that could undermine the use of more sustainable non-car modes.

- 4A.2 UDP policies should seek to ensure that the provision of adequate waste and recycling storage facilities are provided in all new developments.
- 4B.1 The Mayor will, and boroughs should, seek to ensure that developments maximise the potential of sites; are sustainable, durable and adaptable; respect local context, character and communities; and are attractive to look at.
- 4B.3 The Mayor will, and boroughs should, ensure that development proposals achieve the highest possible intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity.
- 4B.6 The Mayor will, and boroughs should, ensure future developments meet the highest standards of sustainable design and construction and reflect this principle in UDP policies. These will include measures to re-use land and buildings, ensure developments are comfortable and secure for users.
- 4.6 **National Planning Guidance**

Planning Policy Statement 1: Delivering Sustainable Development (PPS 1)

PPS 1 sets out the Government's aims in relation to planning policies for the delivery of sustainable development through the planning system. The main goal of the concept of sustainable development is to make provision for the people of today without harming the needs of those in the future. In planning terms one of the main ways of protecting the present needs of people is to prevent the unnecessary usage of natural resources. One way of doing this is by ensuring that the majority of developments are carried out on previously developed land.

Paragraph 27 of PPS 1 outlines the ways in which sustainable development can be provided and includes such approaches as:

- Promoting urban and rural regeneration;
- Providing improved access to jobs, health, education, leisure, shops and community facilities, open space, sport and recreation by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car;
- Promoting the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings.

Planning Policy Statement 3: Housing (PPS 3)

PPS 3 sets out the national planning policy framework for delivering the Government's housing objectives. The policies in this PPS should be taken into account by local planning authorities in the preparation of their Local Development Documents. PPS 3 follows the same principle that new housing should be provided in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure. It also promotes the re-use of previously developed land, as outlined in paragraph 10.

Paragraph 36 of PPS 3 refers to identifying suitable locations for developing new housing. It continues the objectives previously stated in paragraph 10 but states that the priority for development should be on previously developed land and in particular vacant and derelict sites and buildings. Paragraph 37 refers to regional housing strategies and states that authorities should take into account the availability of suitable land, cutting carbon emissions by locating developments where there is good public transport accessibility and the need to maintain sustainable, mixed and inclusive communities.

Paragraph 38 refers to providing housing at a local level and states that Local Development Documents should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development. This paragraph also sets out a hierarchy of options for accommodating new housing growth, which are:

- re-use of vacant and derelict site or industrial and commercial sites;
- additional housing in established residential areas;
- large scale redevelopment and re-design of existing centres;
- expansion of existing settlements through urban expansions; and
- creation of new freestanding settlements.

Planning Policy Statement 25: Development and Flood Risk (PPS 25)

The main aims of PPS 25 are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk from flooding, and to direct development away from areas at highest risk.

It states in paragraph 7 of PPS 25 that Local Planning Authorities (LPAs) should prepare Local Development Documents (LDDs) that set out policies for the allocation sites and the control of development, which avoid flood risk to people and property, where possible, and manage it elsewhere. It also states that policies should recognise the positive contribution that avoidance and management of flood risk can make to the development of sustainable communities, including improved local amenities and better overall quality of life. This guidance continues in paragraph 8 by referring to the duties of LPAs in determining planning applications and such duties are that planning applications should be accompanied by a site-specific Flood Risk Assessment (FRA) as appropriate; by applying the sequential approach to ensure that development is directed to areas of lowest flood risk; promoting the use of Sustainable Urban Drainage Systems (SUDS) and by ensuring that all new development in flood risk areas is appropriately flood resilient and resistant, including safe access and escape routes where required.

Paragraphs 16 to 19 set out the way in which LPAs choose sites for locating new development as part of the new Local Development Framework (LDF) process. The first process for allocating suitable land is by applying the Sequential Test to chosen sites. The Sequential Test requires that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. In areas at risk of river or sea flooding, preference should be given to locating new development in Flood Zone 1. If there are no reasonably available sites in Flood Zone 1 development can be located in Flood Zone 2

or Flood Zone 3. If, following the application of the Sequential Test, it has not been possible to locate development in zones of lower probability of flooding, the Exception Test must be applied, which provides a method of managing flood risk while still allowing necessary development to occur.

Planning Policy Guidance Note 13: Transport (PPG 13)

PPG 13 sets out to integrate planning and transport at the national, regional, strategic and local level and to promote more sustainable transport choices.

Paragraphs 49, 50, 51 and 52 of PPG 13 set out the Government's policy on parking as part of proposed developments. It states that parking takes up a large amount of space in developments, is costly to business and reduces densities. It also states that the amount of cycle parking should be increased to promote use of cycling as a form of transport. It states that maximum parking standards should be used as a package to promote sustainable transport choices and reduce the land take up in developments and that there should be no minimum standards for development, other than for disabled parking.

5.0 The Proposed Development

- 5.1 The application proposal seeks to redevelop the site to provide a 3 storey building, maximising the potential of the site for residential accommodation. The new building would retain the existing building line at the rear but would move the building line at the front closer to the highway and in line with the buildings on either side.
- 5.2 The proposed development would comprise 27 residential units including 15 x 1 bedroom, 10 x 2 bedroom and 2 x 3 bedroom units, 20 vehicle and 27 cycle parking spaces, refuse/recycling storage and communal amenity space. Beneficial use would be made of the site by developing a basement area and locating the parking and refuse storage areas at this level. This would enable a lot more usable space at ground level, which would be used for amenity purposes.
- 5.3 The scheme would include affordable housing units and units which could be adapted to be used by disabled people. The new building would include two internal lifts, which would provide convenient access to the upper floors and basement level for disabled people.

6.0 Planning Assessment

Principle of Development

- 6.1 The principle of development is considered acceptable by virtue of the fact that the existing use of the site and the surrounding area is presently residential. Although the existing buildings are to be demolished, this should be considered acceptable by LBRuT as the replacement building would provide a substantial gain in residential floorspace. The proposal complies with LBRuT's UDP's housing policies, particularly Policies HSG 2 and HSG 4 by providing a significant housing gain on the site.
- 6.2 The principle of the proposed development would also comply with the relevant housing policies of the London Plan, particularly Policies 2A.1 and 3A.3. These policies promote the maximisation of the use of sites and also propose removing vacant and unfit dwellings so that better use can be made of land. The proposed development would maximise the use of the application site by providing a parking area at basement level and ensuring that as much space at ground level is used for residential floorspace and amenity space.
- 6.3 The proposed re-use of brownfield land would also comply with national planning guidance and in particular PPS 1 and PPS 3. Both of these documents promote the re-use of previously developed land as it prevents the unnecessary use of greenfield land and it is also more sustainable to provide developments in this manner. PPS 1 seeks the more efficient use of land through higher density and the use of suitably located previously developed land and buildings and PPS 3 states, in paragraph 38 that the re-use of derelict sites should be the top priority for the provision of additional housing.

Layout of the Proposed Development

- 6.4 The scheme has been proposed to ensure that maximum use is made of the site while at the same time ensuring that the needs of future occupants are accommodated. Account has also been taken of the character and appearance of the surrounding area in the Design and Access Statement.

- 6.5 The scheme proposes to provide a basement level and the main purpose of this is to provide parking and storage space for prospective residents, which would not have been possible to provide at ground floor level whilst maximising the housing gain on the site. This is referred to in paragraph 49 PPG 13 when it states that parking can be a hindrance to development in that it can result in lower densities. The proposed development seeks to provide a development of 27 units (with a density of 150 dwellings per hectare (dph)), that may otherwise not be possible if parking was not located at basement level.
- 6.6 At ground floor level the development seeks to use as much of the site between the rear building line of the existing building and the public highway. As stated earlier, the main reason for retaining the rear building line is not to cause harm to the amenities of neighbouring residences, and this enables the front building line to be brought forward, in line with those buildings adjacent to the site. The resultant floorspace would be occupied by 1 x 3 bedroom, 4 x 2 bedroom and 4 x 1 bedroom units. It would also include the two separate main entrances to the proposed development, one for residents of the privately owned units and another for the affordable units. The entrance to the underground parking area would be situated to the north of the site. The drive into the car park would have a slope of 12%.
- 6.7 At first floor level the development would provide 1 x 3 bedroom, 3 x 2 bedroom and 6 x 1 bedroom units. The footprint of this level would be similar to that of the ground floor but would be set in at the south west and north west corners so as to remove any possible harm to the immediately adjacent properties in terms of overlooking or a loss of privacy. At second floor level the building would be set in on all sides, whilst providing 3 x 2 bedroom and 4 x 1 bedroom units at this level.
- 6.8 Fourteen x 1 bedroom units are proposed and this would comply with LBRuT's policy on the provision of small units, Policy HSG 11. It states that new developments should seek to provide at least 25% small units (1 bedroom or studio). The proposed development seeks to provide approximately 52% small units. The proposal also complies with Policy HSG 8 of the UDP, which requires that 10% of units in residential developments of 10 units or more should be specifically designed for, or

capable of easy adaptation to, wheelchair housing. The development is seeking to provide 3 mobility standard units, which equates to 11% of the total proposed.

- 6.9 Amenity space would be provided as part of the scheme, and the amount proposed is considered to be the maximum amount possible due to the number of units and the provision of the underground car park.

Density

- 6.10 The existing development has a density of approximately 72 dph but it does not comprise a sufficient area for residents parking nor does it provide an appropriate mix of units. However, the proposed development seeks to overcome all of these issues and provides a building that would actually be lower in height than the existing building but would accommodate the same number of floors of accommodation. This has been made possible by the lowering of the site to accommodate the basement parking area. The resultant building would provide a density of 150 dph, which although is double that of the existing density, it would result in more efficient use of the site without causing harm to neighbouring occupiers in compliance with HSG 4 of the UDP.
- 6.11 The proposed density also complies with Policy 4B.3 and Table 4B.1 of the London Plan. Policy 4B.3 emphasises the maximisation of the use of sites and underlines that sites should achieve the highest possible intensity of use compatible with local context, public transport capacity and the design principles outlined in Policy 4B.1. The proposal would be compatible with local context and transport capacity and incorporates the design principles of Policy 4B.1. Table 4B.1 states that for developments, consisting mainly of flats, in areas with a PTAL of between 2 and 3, that a density of between 100-150 dph is appropriate. Therefore, the density of the proposed scheme would be appropriate for the site and would not result in harm to the surrounding area or the public transport network. It also sets out in the London Plan Alterations specific housing targets for each of the boroughs in the Greater London Area and each borough is expected to meet or exceed these targets.

Affordable Housing

- 6.12 Policy HSG 6 of the UDP states that new developments on sites capable of providing 10 or more units, or of 0.3 hectares in area or more, should seek to provide 40% of the total units proposed as affordable units. The scheme seeks to provide a total of 10 units as affordable housing. The gross internal floorspace of the proposed affordable units would be 661m². The gross internal floorspace of the whole development would equate to 1654m². Therefore, the proportion of affordable floorspace compared to the floorspace of the whole development would equate to 40% and so it is considered that it would comply with Policy HSG 6 of the UDP. It has been agreed with LBRuT that the approach of providing larger units for the affordable element of the scheme is appropriate in terms of Policy HSG 6. There is an identified need in the borough for developments to include affordable housing units with greater floorspace areas for family accommodation, instead of a greater number of units with less internal floorspace.

Parking

- 6.13 The scheme includes 20 car parking spaces and 27 bicycle parking spaces. The provision of 27 cycle spaces and the reduced number of car parking spaces promotes the use of sustainable methods of transport such as walking, cycling and public transport. This complies with the guidance in PPG 13, which states that the provision of parking spaces should be the minimum necessary. The level of parking proposed also complies with Policy 3C.22 of the London Plan, which promotes maximum levels of parking in new developments.
- 6.14 Policy TRN 4 of the UDP seeks an appropriate provision of parking for disabled people in new developments. This is also reinforced in paragraph 31 of PPG 13. The proposed development seeks to provide 3 parking spaces (15%), which would be specifically designed and designated for use by disabled people. The parking area would also include lifts that would provide access to the upper floors of the development. This is to ensure that the parking area is accessible by everyone.

Flooding

- 6.15 The proposal would ensure that the development complies with the guidance outlined in PPS 25 and would not result in harm to future occupiers or other properties in the surrounding area as a result of flooding.
- 6.16 The aim of PPS 25 is to ensure that development is directed to areas with the lowest possible flood risk (i.e. Flood Zone 1). It also seeks to ensure that when new development is exceptionally necessary that it is safe without increasing flood risk elsewhere and, if possible, reduce flood risk overall. The applicant has commissioned the production of a Flood Risk Assessment (FRA), which was undertaken by Fenland Hydrotech Ltd. in September 2007. The site is located within Flood Zone 3a, which is defined as an area of high probability of flooding in table D.1 of PPS 25. This is also confirmed in Figure 005 of LBRuT's draft Strategic Flood Risk Assessment (SFRA). For development to take place in Flood Zone 3 a FRA must be produced demonstrating that the proposal would not cause harm to future occupiers or other areas as a result of the displacement of floodwater, and a Sequential and Exception Test must be undertaken to demonstrate that there are no alternative available sites where the development could be accommodated.
- 6.17 The application documents include a statement outlining the Sequential and Exception Tests and it is demonstrated that the application site is the only alternative available site that could accommodate the proposed development. This conclusion has been reached by obtaining a copy of LBRuT's Housing Land Availability Assessment (August 2007) and comparing this with the index of proposal sites outlined in the UDP. It resulted in 3 sites being considered as part of the Sequential Test, which were Twickenham Riverside (T1), Friars Lane Car Park (R4) and Terrace Yard, Petersham Road (R11). None of these sites could accommodate the proposed development, however, as all of the sites are smaller than the application site and would not be able to provide as many units as is now proposed. Also, one of the sites (R4) is located closer to a source of flooding, the River Thames in this example, and so is considered to be more at risk from flooding than the application site. Therefore, it has been demonstrated that the application site is the most preferable in terms of at risk of flooding and would not

result in any harm to future residents or neighbouring properties as a result of flooding or the displacement of flood water.

6.18 Once a proposal passes the Sequential Test, it is then necessary to carry out the Exception Test. PPS 25 states that in exceptional circumstances there may be valid reasons for a development type that is not entirely compatible with the level of flood risk. In order for LBRuT to be able to meet its housing targets to avoid economic and social blight some residential development will need to take place in Flood Zone 3 but only where it can be demonstrated that the development will be safe. The Exception Test sets out three stringent conditions that must be passed and they are:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh the flood risk implications of developing the site;
- The development must be on developable previously developed land; and
- A site specific FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.

The development would be provided on previously developed land and a site-specific FRA has been produced, which demonstrates that the development will be safe and would not increase flood risk elsewhere. Therefore, the second and third conditions have been complied with. In relation to the first condition, the proposal seeks to re-use the existing land and provide a development which would include more modern and sustainable building materials such as double glazed windows, CHP and Sustainable Urban Drainage Systems (SUDS). The provision of a basement car park would also be sustainable by being able to provide more development on site as a result of the additional space and it would also assist with accommodating more floodwater, which would otherwise be displaced if the development did not provide this area at basement level. The promotion of the use of alternative methods of transport by providing less than the maximum number of parking spaces and the provision of affordable housing would also enhance the sustainability benefits to the community that would outweigh flood risk implications. Therefore, the proposed development passes the Exception Test.

- 6.20 As a result of passing the Sequential and Exception Tests, the proposed development complies with the guidance outlined in PPS 25 by demonstrating that the building, prospective residents or neighbouring properties would not be subjected to harm, caused by flooding, as a result of the scheme being developed. It would also, therefore, comply with Policy ENV 34 of the UDP.

Sustainability Issues

- 6.21 The applicant has completed and submitted a Sustainable Construction Checklist, which is required to be submitted with applications for residential developments of 6 or more units. LBRuT requires an Eco-homes 2006 'Excellent' level on all residential schemes. Following consideration of the proposed scheme against each of the points in the checklist, the applicant has demonstrated that the proposal would achieve an 'Excellent' level and would provide a highly sustainable development.

7.0 Conclusion

- 7.1 The layout of the proposed redevelopment of the site would result in the maximisation of the use of the land and would result in a highly sustainable development, which would provide a net increase of 14 dwellings as well as sufficient cycling and car parking space, refuse/recycling storage and communal amenity space. It would, therefore, comply with Policies HSG 2 and 4 of the UDP and the relevant policies in the London Plan and London Plan Alterations.
- 7.2 The development would provide a benefit to the Borough's housing stock with the provision of an additional 14 dwellings but, more importantly, with the provision of 10 affordable units. The inclusion of over 50% small units would also be of benefit to existing or potential residents of the Borough.
- 7.3 The development would comply with the relevant guidance on flood risk contained in PPS 25 and, as a result of the dwellings being situated at a higher level above ground than those existing, it would mean that future residents would be unlikely to suffer any damage as a result of flooding. The proposal would also comply with Policy ENV 34 of the UDP.
- 7.4 The development, by meeting the Eco-homes 'Excellent' rating, as required by LBRuT, would be highly sustainable.
- 7.5 It is considered that the proposed development complies with the relevant local, regional and national planning policies and guidance referred to in section 4 of this statement, whilst providing a development of the highest quality of design and sustainable homes.