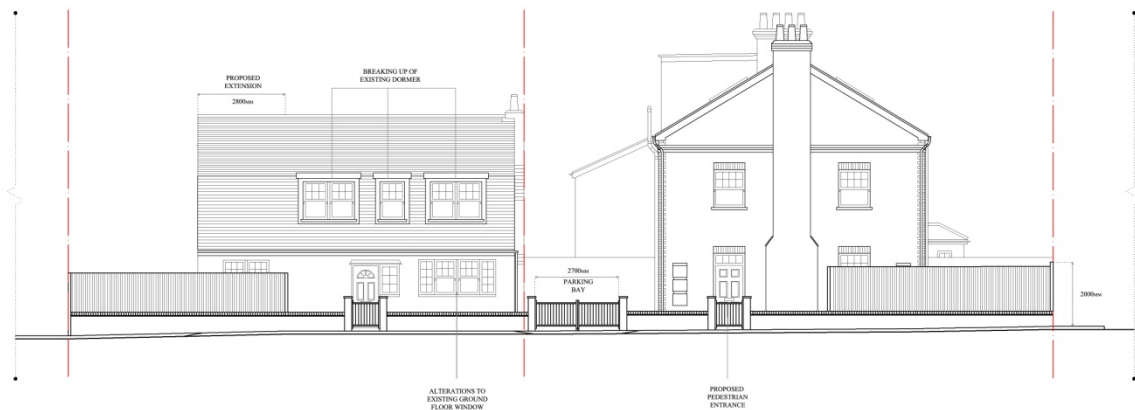


P001: PLANNING STATEMENT

2 TILEHURST ROAD SM3 8PB

(REVISED MARCH 2022)



0.01 INTRODUCTION: DEVELOPMENT PROPOSAL AND SMALL SITES CONTEXT

0.02 The development proposal (S001-S012) seeks to realise an opportunity to provide incremental housing development on a corner infill site within a terraced and linear block context as to figure 2.3 of the Small Sites Design Codes LPG (Draft 2022) which is extracted and combined below:

Small Site Design Codes LPG

Figure 2.3 Opportunities for incremental housing development within terraced and linear block context



0.03 The development site exists in close proximity to Cheam Village and is within 100m of the entrance to Cheam Recreation Ground.

0.04 The existing detached 2 bedroom house is situated at odds with the existing terrace along Malden Road and is separated out from forming any congruous streetscape on Tilehurst Road.

0.05 While the principle elevation does face onto Tilehurst Road the property is characterised by a non standard orientation with no rear aspect and a hard landscaped back garden area to the LHS and another large parcel of mixed vegetative and "brown-field" land to the RHS that occupies the corner plot position but does not open out from the house itself.

0.06 The development proposal intends to bifurcate the existing site and construct a new corner dwelling that follows both the existing building line on Tilehurst Road and the building line on Malden Road.

0.07 The principle elevation of this new dwelling would front onto Tilehurst road with low walls and visible green spaces. In conjunction with the proposed 2 story addition to the existing house the

development proposal acts to create an attractive extension to the streetscape that enhances public amenity and local character.

- 0.08** The existing streetscape and locale is of a mixed character and the proposed building seeks to take cues from the surrounding forms and materials to create an "aesthetic bridge" that naturalises and integrates the existing house into the larger experience of the urban fabric.
- 0.09** The existing house is poorly sited and of a poor design quality and character. The proposed development and alterations would bring the property into better accord all round by optimising the site capacity in regard to the "Enhance/Moderate" criteria of the Capacity for Growth and Change Matrix enclosed within the Characterisation and Growth Strategy LPG (Draft 2022):

Table 4.1 Capacity for growth and change matrix

| | Conserve | Enhance | Transform |
|-----------|--|---|--|
| Limited | <u>High quality and coherent character with limited capacity for growth</u> Successful design quality High social and cultural significance Sensitive to change Low opportunity for growth | <u>Mixed quality of character with limited capacity for growth</u> Some success of design quality Some social and cultural significance Some sensitivity to change Low opportunity for growth | <u>Low-quality or ill-defined character with limited capacity for growth</u> Not successful design quality low social and cultural significance not sensitive to change Low opportunity for growth |
| Moderate | <u>High quality and coherent character with moderate capacity for growth</u> Successful design quality High social and cultural significance Sensitive to change Medium opportunity for growth | <u>Mixed quality of character with moderate capacity for growth</u> Some success of design quality Some social and cultural significance Some sensitivity to change Medium opportunity for growth | <u>Low-quality or ill-defined character with moderate capacity for growth</u> Not successful design quality Low social and cultural significance Not sensitive to change Medium opportunity for growth |
| Extensive | <u>High quality and coherent character with extensive capacity for growth</u> Successful design quality High social and cultural significance Sensitive to change High opportunity for growth | <u>Mixed quality of character with extensive capacity for growth</u> Some success of design quality Some social and cultural significance Some sensitivity to change High opportunity for growth | <u>Low-quality or ill-defined character with extensive capacity for growth</u> Not successful design quality Low social and cultural significance Not sensitive to change High opportunity for growth |

- 0.10** The development site is not situated within a "conservation area" and is situated in an "opportunity area of potential intensification". Therefore it would be fair to say that the supposition in 0.09 is a reasonable assumption.
- 0.11** While it is acknowledged that the suite of LPG Documents still exist in draft format and cannot carry material weight it must be also be recognised that certain parts of the London Plan (2021) do not make sense without them. With this in mind the intention will be to refer to the relevant Draft LPG's only for clarification and elucidation rather than justification.
- 0.12** Policy H1 of the London Plan (2021) stipulates that there is a 10 year Housing Target of 4,690 to be realised in the Borough of Sutton (Table 4.1); and as to Policy H2, 2,680 (Table 4.2) of these dwellings are to be realised on small sites of less than 0.25 Hectares.

0.13 The character of the London Borough of Sutton is complex but the need for viable housing remains as stated by Policy H2B of the London Plan (2021):

" B Boroughs Should:

1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites "

0.14 Additionally H2A states that Boroughs should:

" 1) significantly increase the contribution of small sites to meeting London's housing needs.

2) diversify sources, locations, type and mix of housing supply "

0.15 Policy 28 of the Sutton Local Plan (2018) states that:

"The council will grant permission for new development, including new buildings"

As to the following Criteria:

Policy 28: Character and Design

The council will grant planning permission for new development, including new buildings, alterations and extensions, provided the new development:

- a** Is attractive, designed to the highest standard, especially with regard to architectural detailing, and uses high-quality materials.
- b** Respects the local context and responds to local character and heritage assets.
- c** Is of a suitable scale, massing and height to the setting of the site and/or townscape.
- d** Seeks to improve an area of poor character.
- e** Makes a positive contribution to the street frontage, streetscene and / or public realm, such as using railings and low walls where practicable.
- f** Is inclusive and accessible for all and improves movement through areas with direct, accessible and easily recognisable routes.
- g** Is secure and designed to minimise crime and anti-social behaviour.
- h** Is robust and flexible in use.
- i** Responds to natural features and retains trees, hedges and other landscape features and spaces of amenity value, where possible.
- j** Is not dominated by car and cycle parking.
- k** Creates attractive, functional and clearly defined public and private space.
- l** Protects any important local views and creates new ones wherever possible.
- m** Carefully integrates building services equipment and, in industrial areas, operating equipment.
- n** Maintains the setting and visual amenity of the Green Belt, Metropolitan Open Land, Public Open Space and Urban Green Space.

Opportunities for the removal of poor townscape and its replacement by development of an improved quality and scale will be pursued.

0.16 The following planning statement will be divided into 2 sections to demonstrate compliance with local, regional and national Policy as following.

1. QUANTITATIVE INTENSIFICATION: SUSTAINABLE DENSITY IN AN URBAN CONTEXT
 2. OPTIMISING SITE CAPACITY: AMENITY AND DESIGN LED APPROACH
-

1.01 QUANTITATIVE INTENSIFICATION: SUSTAINABLE DENSITY IN AN URBAN CONTEXT

1.02 PLANNING FOR GROWTH WITH OPPORTUNITY AREAS

1.03 Policy SD1 and D1 of the London Plan (2021) asks London Boroughs to set out opportunity areas in their development plans that identify significant locations with development capacity to accommodate new housing. The Sutton Local Plan (2018) achieves this objective by identifying central settings and areas of potential intensification which are clearly set out in the Sutton Local Plan Appendix (2018).

1.04 Map 1.3 (p.21) of the aforementioned Appendix sets out the area of potential intensification for Cheam District Centre which identifies the proposed development site within this zoned or pre-designated opportunity area of potential intensification.

1.05 Policy 7 of the Sutton Local Plan (2018) states that:

" Within District Centres and the Areas of Potential Intensification

(d) As a guide the council will expect new developments to be within the "Urban" Setting of the London Plan Density Matrix. "

1.06 The Transport for London WebCAT (web-based Connectivity Assessment Toolkit) identifies the proposed development site with a PTAL (access level) of 2/3.

1.07 The proposed development site is 250m² and the proposal consists of 2 units and 8 habitable Rooms. This gives the site a rating of 4hr/unit.

1.08 The Sustainable Residential Quality (SRQ) Density Matrix referred to in Policy 7 is inserted below. The "Urban" category is highlighted (as to 1.05) in addition to the corresponding PTAL and appropriate number of habitable rooms per unit (as to 1.06 and 1.07):

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

| Setting | Public Transport Accessibility Level (PTAL) | | |
|-----------------|---|---------------|----------------|
| | 0 to 1 | 2 to 3 | 4 to 6 |
| Suburban | 150–200 hr/ha | 150–250 hr/ha | 200–350 hr/ha |
| 3.8–4.6 hr/unit | 35–55 u/ha | 35–65 u/ha | 45–90 u/ha |
| 3.1–3.7 hr/unit | 40–65 u/ha | 40–80 u/ha | 55–115 u/ha |
| 2.7–3.0 hr/unit | 50–75 u/ha | 50–95 u/ha | 70–130 u/ha |
| Urban | 150–250 hr/ha | 200–450 hr/ha | 200–700 hr/ha |
| 3.8–4.6 hr/unit | 35–65 u/ha | 45–120 u/ha | 45–185 u/ha |
| 3.1–3.7 hr/unit | 40–80 u/ha | 55–145 u/ha | 55–225 u/ha |
| 2.7–3.0 hr/unit | 50–95 u/ha | 70–170 u/ha | 70–260 u/ha |
| Central | 150–300 hr/ha | 300–650 hr/ha | 650–1100 hr/ha |
| 3.8–4.6 hr/unit | 35–80 u/ha | 65–170 u/ha | 140–290 u/ha |
| 3.1–3.7 hr/unit | 40–100 u/ha | 80–210 u/ha | 175–355 u/ha |
| 2.7–3.0 hr/unit | 50–110 u/ha | 100–240 u/ha | 215–405 u/ha |

- 1.09** The Density Matrix defines the acceptable range of sustainable densities for the site in question as 45-120 units per hectare.
- 1.10** Given that: $250\text{m}^2 = 0.025 \text{ ha}$; the corresponding number of units appropriate for the site in question would be 1.13 - 3.00 units.
- 1.11** In this regard it would seem fair to say that the proposal of 2 units for the site in question would be middling; and categorically not indicative of "over development" according to Sutton's stated policy on sustainable density.
- 1.12** While it is accepted that the SRQ Density Matrix has been redacted and is not included in the London Plan (2021), Policy 7 of the Sutton Local Plan (2018) and the London Plan Housing SPG (2017) have not. As such the satisfaction of the Density Criteria set by Policy 7 of Sutton's DPD should be viewed as a material consideration in favour of the development proposal.

1.13 THE DISCONTINUATION OF THE SRQ DENSITY MATRIX

- 1.14** While the redaction of the SRQ Density Matrix from the London Plan (2021) has created some amount of quantitative uncertainty, the qualitative reasoning was expressed by the Mayor (Q/A: 17/05/2019) as following:

" Fifteen years of evidence indicates that the density matrix has provided a poor benchmark or indicator of appropriate densities. Over that period, only 35 per cent of development has been within the density matrix range, whereas **50 per cent of development has exceeded the matrix range for its location and 25 per cent has been double the top end of the range.**

Considering London's housing need, optimising the density of all new development is a strategic matter for London. My draft London Plan explicitly recognises that **the appropriate density of a site is an output of a process of assessment, rather than an input.** The appropriate density of a site should be arrived at through a design-led approach, taking account of the site context and infrastructure capacity. Paragraph 122 of the NPPF (2019) requires planning policies and planning decisions to support development that makes efficient use of land, taking into account a range of contextual factors. My draft London Plan is consistent with this requirement. "¹

- 1.15** As such it must be appreciated in part that the reasoning behind the discontinuation of the SRQ Density Matrix was that as a quantitative index it practically "under-specified" appropriate Densities (in 50% of cases) approved through planning judgement (on a case by case basis and where design considerations could prevail²).
- 1.16** Therefore while the SRQ Density Matrix remains the best quantitative tool for assessing sustainable urban densities- and remains published as part of Sutton's operative procedure for defining sustainable densities- it should be evaluated as providing (if anything) an overly conservative output.
- 1.17** This makes it very difficult to suggest the obverse; and arguably would add further weight to the proposition in 1.12. I.e. the proposed urban density of 2 units is middling in regard to a quantitative measure that was primarily discontinued due to under-specification of sustainable densities in an urban context.

1.18 RELATIVE AND OPTIMISED SITE CAPACITY (D1/D3)

1.19 The void left behind by the removal of SRQ Density Matrix is filled by the qualitative method of "optimising site capacity through a design led approach" as specified in D3 (3.3.2):

" **A design-led approach** to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site "

1.20 The "qualitative design led approach" will be considered in the next section and the intention of this section is to examine the evidence in relation to a quantitative examination of how the proposed development relates to its' urban context.

1.21 The term "site capacity" is indicative of proposed or theorised levels of realistic growth potential. Therefore as a concept site capacity cannot be artificially limited to what exists currently but must contain some measure of account towards reasonable or possible development.

1.22 Additionally 1.3.1 of the London Plan Housing SPG (2017) states:

" "Optimisation" can be defined as 'developing land to the fullest amount consistent with all relevant planning objectives "

1.23 D3 of the London Plan (2021) states that:

"Comparing Density between Schemes using a single measure can be misleading"

1.24 D3 of the London Plan (2021) additionally specifies 7 Core Density Metrics in 3.3.22 and 3.3.23 by which to comparatively evaluate sites in conjunction with the classification of opportunity areas specified in SD1.

1.25 The intention of this section is to show that the density of the proposed development is not metrically incongruous in relation to the "site capacity" of the immediate neighbouring sites of 4-6 Tilehurst Road and 76-126 Malden Road.

1.26 The site capacity of 4-6 Tilehurst Road is considered as existing since both houses have been subject to a moderate amount of incremental development and opportunity for further development is somewhat slim (but not unimaginable).

1.27 The site capacity of 76-126 Malden Road is considered in relation to lawful development through the GPDO 2020 with the limits of such set to pre-realised precedent. (i.e. 50% ancillary outbuildings and 6m prior approval extensions are not considered as they lack specific precedent in this case).

1.28 The relative site capacities of the proposal and the adjoining Sites are set out in the comparative tables below (1.31) that additionally sets out the relative deviation across the 7 core density metrics in D3 of the London Plan (2021).

1.29 Overall it can be seen that the average deviation between the proposed development across all 7 Density Metrics specified in D3 is **+28%** in relation to the "limited" suburban site of 4-6 Tilehurst Road and **-6%** in relation to the site capacity of the "moderate" urban site of 76-126 Malden Road.

1.30 While no "threshold values" for acceptable density variation have been methodologically established it is fair to say that across the board and on balance, these figures illustrate that the proposed density is not unreasonable and in principle would not cause any material harm.

1.31 Comparative density and relative optimised site capacity analysis:

London Plan (2021): (SD1) / London Plan Housing SPG 2017 / Sutton Local Plan (2016-31): P7

| | 4-6 Tilehurst Road (Site Capacity) | 2 Tilehurst Road (Site Capacity) | 76-126 Malden Road (Site Capacity) |
|---------------------------------|---------------------------------------|-------------------------------------|---------------------------------------|
| Opportunity Area Classification | Sub Urban (Limited) | Urban (Moderate) | Urban (Moderate) |

London Plan (2021): D3 (3.3.22)

| | 4-6 Tilehurst Road (Site Capacity) | Relative Deviation | 2 Tilehurst Road (Site Capacity) | Relative Deviation | 76-126 Malden Road (Site Capacity) |
|-----------------------------|---------------------------------------|--------------------|-------------------------------------|--------------------|---------------------------------------|
| Units per Hectare | 47 | (+70%) | 80 | (+9%) | 72 |
| Habitable rooms per Hectare | 281 | (+14%) | 320 | (-13%) | 360 |
| Bedrooms per Hectare | 187 | (+28%) | 240 | (+11%) | 217 |
| Bed spaces per Hectare | 228 | (+40%) | 320 | (-13%) | 362 |

London Plan (2021): D3 (3.3.21)

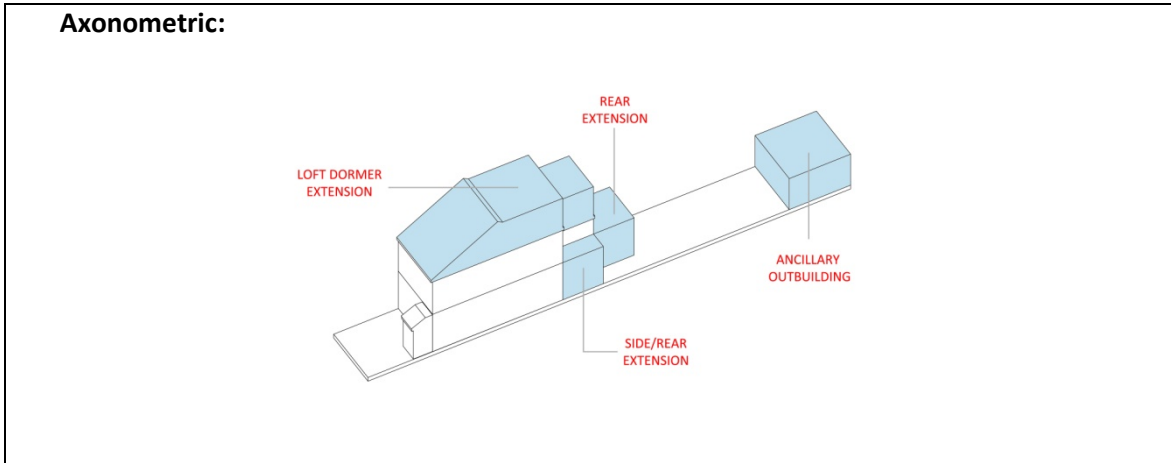
| | 4-6 Tilehurst Road (Site Capacity) | Relative Deviation | 2 Tilehurst Road (Site Capacity) | Relative Deviation | 76-126 Malden Road (Site Capacity) |
|---------------------|---------------------------------------|--------------------|-------------------------------------|--------------------|---------------------------------------|
| Floor Area Ratio | 53% | (+36%) | 89% | (-23%) | 112% |
| Site Coverage Ratio | 29% | (+11%) | 40% | (-15%) | 55% |
| Maximum Height | 8.5m | (+0%) | 8.5m | (0%) | 8.5m |

Average Deviation:

| | | | | | |
|----------------------------------|----------------------------------|---------------|--------------------------------|--------------|--|
| Average Deviation Across Metrics | 4-6 Tilehurst (Site Capacity) | (+28%) | 2 Tilehurst (Site Capacity) | (-6%) | 76-126 Malden Road (Site Capacity) |
|----------------------------------|----------------------------------|---------------|--------------------------------|--------------|--|

1.32 76 - 126 MALDEN ROAD SITE CAPACITY ANALYSIS:

| | |
|--|---|
| Opportunity Area Classification | Urban (Moderate) |
| Defining Capacity Factors | Existing Buildings GPDO Tolerances |



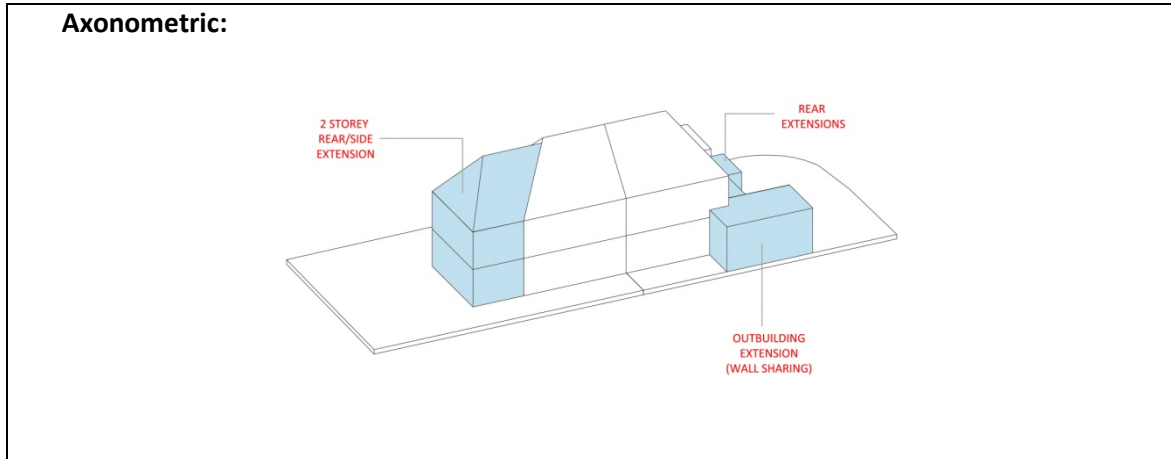
| | | | |
|-------------------------------|------------|---------------------------------|----------|
| Number of Units | 1 | Bedrooms per Unit | 3 |
| Number of Stories | 2.5 | Habitable Rooms Per Unit | 6 |
| BedSpaces (Occupation) | 5 | Bedspaces Per Unit | 5 |



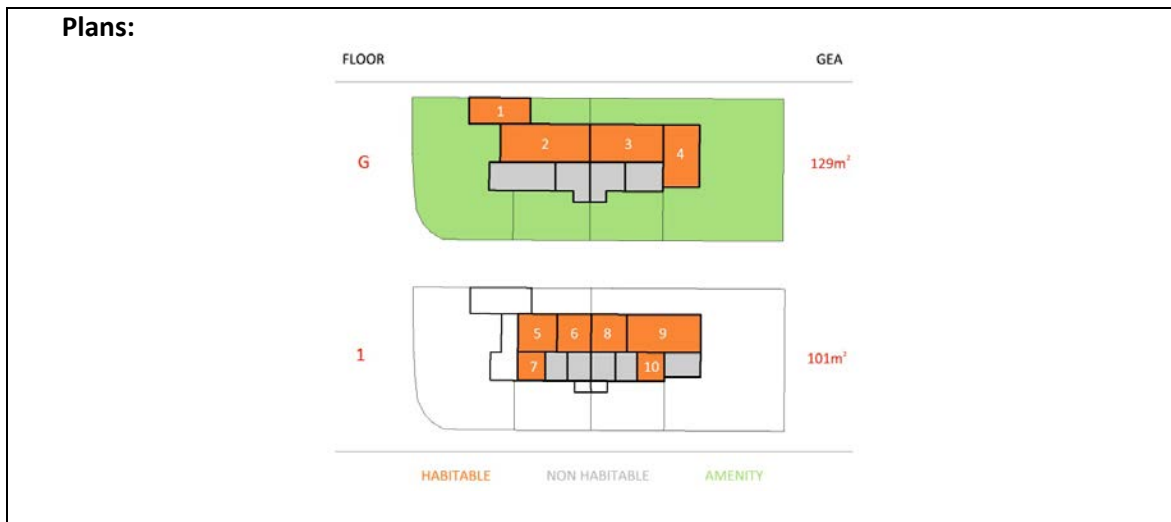
| | | | |
|-----------------------------|-------------------------|---------------------------------|-------------------------|
| Site Area (m2) | 138m² | Site Area per Unit (m2) | 138m² |
| Site Area (ha) | 0.0138ha | Total Site Coverage (m2) | 76m² |
| Amenity Space (m2) | 62m² | Amenity Space per Unit | 62m² |
| Total Floor Plan GEA | 155m² | Floor Plan GEA Per Unit | 155m² |

1.33 4-6 TILEHURST ROAD SITE CAPACITY ANALYSIS:

| | |
|--|--|
| Opportunity Area Classification | Sub Urban (Limited) |
| Defining Capacity Factors | Existing Buildings Existing Permissions |



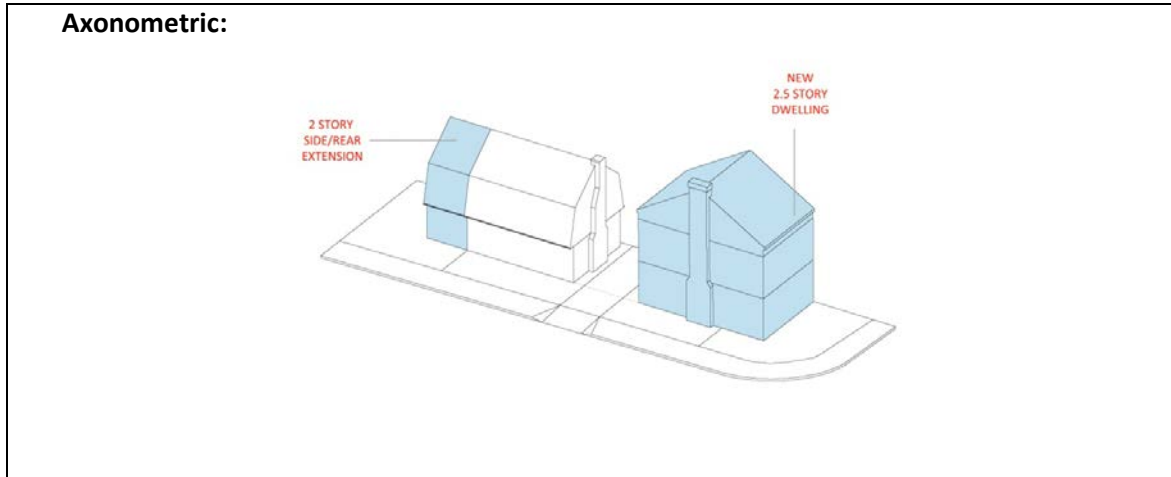
| | | | |
|--------------------------------|-----------|---------------------------------|----------|
| Number of Units | 2 | Bedrooms per Unit | 3 |
| Number of Stories | 2 | Habitable Rooms Per Unit | 5 |
| Bed Spaces (Occupation) | 10 | Bed Spaces Per Unit | 5 |



| | | | |
|-----------------------------|-------------------------|---------------------------------|-------------------------|
| Site Area (m2) | 438m² | Site Area per Unit (m2) | 219m² |
| Site Area (ha) | 0.0438ha | Total Site Coverage (m2) | 129m² |
| Amenity Space (m2) | 309m² | Amenity Space per Unit | 155m² |
| Total Floor Plan GEA | 230m² | Floor Plan GEA Per Unit | 115m² |

1.34 2 TILEHURST ROAD SITE CAPACITY ANALYSIS:

| | |
|--|-----------------------------|
| Opportunity Area Classification | Urban (Moderate) |
| Defining Capacity Factors | Proposed Application |



| | | | |
|--------------------------------|------------|---------------------------------|----------|
| Number of Units | 2 | Bedrooms per Unit | 3 |
| Number of Stories | 2.5 | Habitable Rooms Per Unit | 4 |
| Bed Spaces (Occupation) | 8 | Bed Spaces Per Unit | 4 |



| | | | |
|--------------------------------------|-------------------------|--|-------------------------|
| Site Area (m²) | 250m² | Site Area per Unit (m²) | 125m² |
| Site Area (ha) | 0.0250ha | Total Site Coverage (m²) | 100m² |
| Amenity Space (m²) | 150m² | Amenity Space per Unit | 75m² |
| Total Floor Plan GEA | 222m² | Floor Plan GEA Per Unit | 104m² |

1.35 OVERVIEW

- 1.36** Through an evidence based approach it can be concluded that the proposal accords with both the Sutton Local Plan (2018) and the London Plan (2021) in relation to quantitatively specified and relative density metrics.
- 1.37** The proposal should be considered to achieve a sustainable density in an "Urban" (moderate) context and additionally is in relative accord (28%) with the "Suburban" (limited) context of the neighbouring block site on 4-6 Tilehurst Road.
- 1.38** No legitimate material concerns of significant harm can be reasonably raised in relation to "over development" or unsustainable urban densities. This would stand even if something were to be made of the site's location on the edge of (but still within) the designated opportunity area of intensification.
- 1.39** While the analysis here is somewhat pained the general idea must be appreciated that the removal of the SRQ Density Matrix and the specification of a "design led approach" means that quantitative density metrics are somewhat empty signifiers. Whereby, the abstract concept of quantitative "over-development" almost always stands as a proxy representing other (potentially non material) concerns in relation to design and amenity. As stated by the Outer London Commission's independent Consultants and quoted in the London Plan Housing SPG 2017 (1.3.5):
- “ residential density policy is about everything and nothing. On the one hand it informs everything to do with housing design and management. On the other hand, the actual density calculation of an acceptable development (in terms of units or habitable rooms per hectare) is a product of all the relevant design and management factors; if they are all met, the resultant figure is what it is and is arguably irrelevant. ”
- 1.40** However, to this intent it has been demonstrated through an evidence based approach that quantitative density concerns and the concept (in the abstract) of "over-development" cannot be used as a valid material consideration in favour of refusal.
-

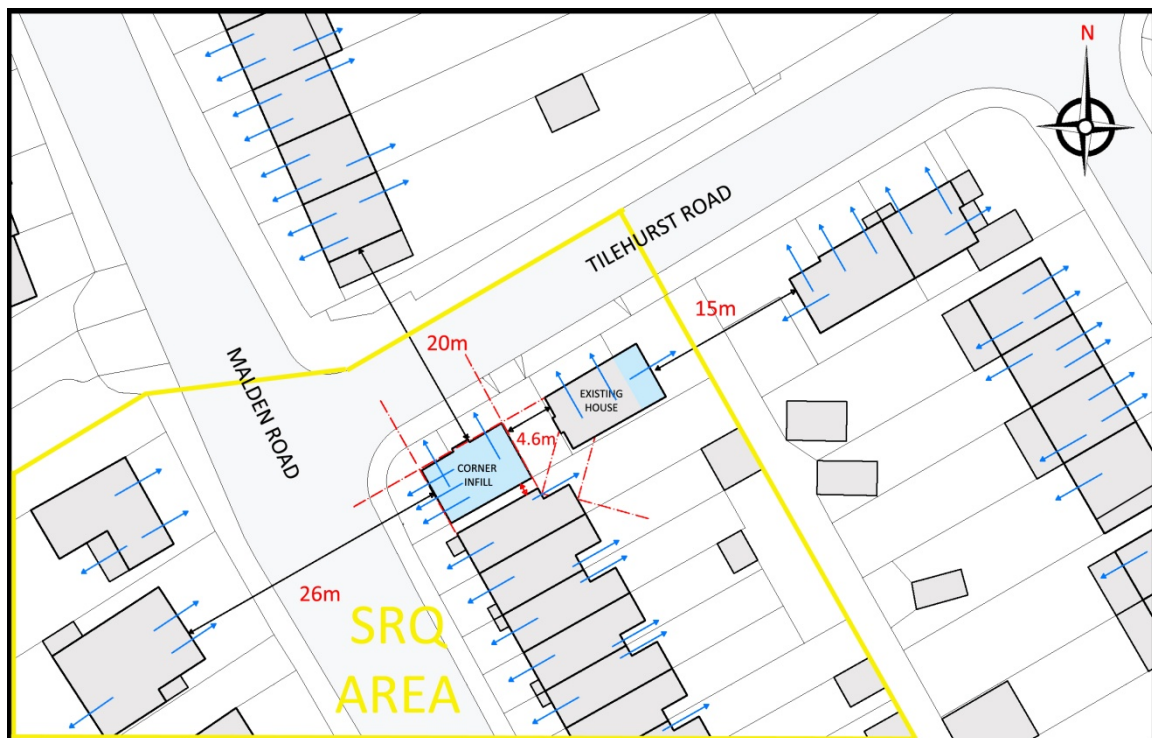
2.01 OPTIMISING SITE CAPACITY: AMENITY AND THE DESIGN LED APPROACH

2.02 Optimising site capacity is simply defined as providing the maximal amount development within the relevant scope of the local design and management framework consisting of: Sutton Local Plan (2018); Local Plan Technical Guidance Note (2018); Urban Design Guide (2008); Design of Residential Extensions (2006); and Designing Out Crime (2005).

2.03 BUILDING LINES; SEPARATION DISTANCES; OUTLOOK AND VISUAL AMENITY

2.04 The proposed new dwelling occupies a "corner infill site" in a "mixed streetscape" and the first set of capacity factors are the existing building lines and the visual amenity of the neighbouring property at 126 Malden Road.

2.05 The block plan below shows how the proposed corner infill respects the existing building lines with a "side return frontage" that is setback in line with the existing dwelling on Tilehurst Road. The site area is defined and delimited by these building lines in addition to the 45 degree amenity line from the nearest habitable room at 126 Malden Road (shown in red dash).



2.06 An adequate separation distance of 26m is maintained between the return frontage on Malden Road and the opposing property.

2.07 An adequate separation distance of 20m is maintained between the Principal Elevation on Tilehurst Road and opposing side elevation at 128 Malden Road which is additionally buffered by a corridor of vegetative space.

2.08 While the separation distance of 15m is lower than the figure of 20m this should be viewed as adequate in relation to the spacing between side and rear elevations. As indicated by the Design of Residential Extensions (2006) paragraph 3.4.3:

" A separation distance of 14m between side and rear elevations is expected "

2.09 The distance of 4.6m between side elevations should be viewed as a "gap" rather than a "separation distance between two outlooks". The existing and proposed dwellings are set "side-to-side" as a pair in what is essentially a deconstructed terrace formation that acts to protect the visual amenity of 126 Malden Road and avoid any sense of enclosure or visual intrusion through a setback of 2700mm from the rear wall of the outrigger.

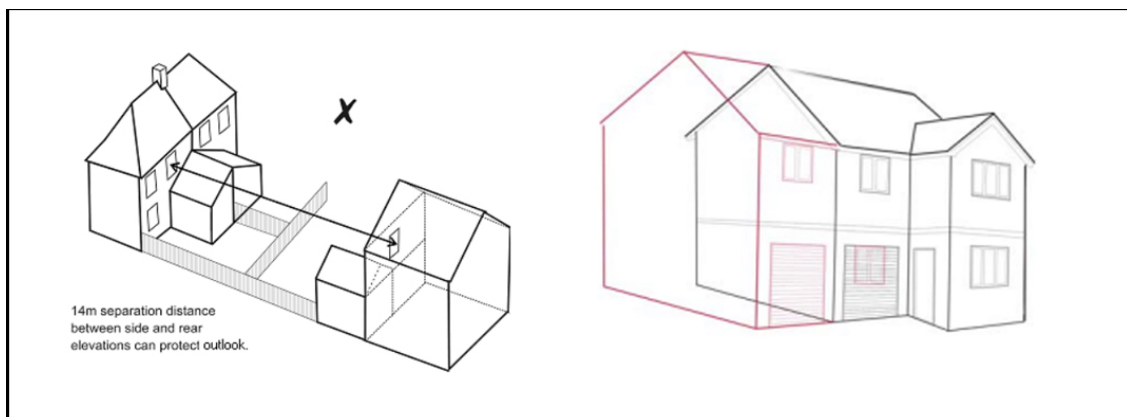
2.10 Additionally, all side elevation windows at first floor level that front onto this 4.6m gap are opaque and un-opening below 1700mm. This prevents any mutual overlooking between the two houses and additionally protects the privacy of the rear amenity space at 126 Malden Road.

2.11 This approach is advocated by Design of Residential Extensions (2006) Paragraph 3.3.3:

" An "intelligent" internal plan arrangement can place those rooms which need no natural light, or where windows can be obscurely glazed (to) face the neighbours. "

2.12 The only outlook onto the interstitial area between the proposed new dwelling and 2 Tilehurst Road is provided from the new dwelling out onto the parking area at ground floor level in order to enhance security by designing out crime.

2.13 The diagram below extracts Figure 8 and Figure 3 from Design of Residential Extensions (2006) showing that the proposed extension to 2 Tilehurst Road would comply with separation requirements and adopt an "integrated approach".



2.14 The proposed 2 storey extension to Tilehurst Road is 10m from the immediate garden area of 126 Malden Road and has no impact on the visual amenity from habitable rooms due its' oblique positioning to the North-North-East.

2.15 The first floor outlook arrows are drawn onto the block plan in blue and establish that the dual aspect of the new dwelling mirrors the dual aspect of the existing dwelling and as a pairing has an identical pattern of outlook as the neighbouring development on Tilehurst Road.

2.16 Therefore, it is fair to say that the proposed development should be viewed as a continuation of the existing character and any overlooking is mediated by adequate separation distances and by the propagation and extension of the existing street pattern.

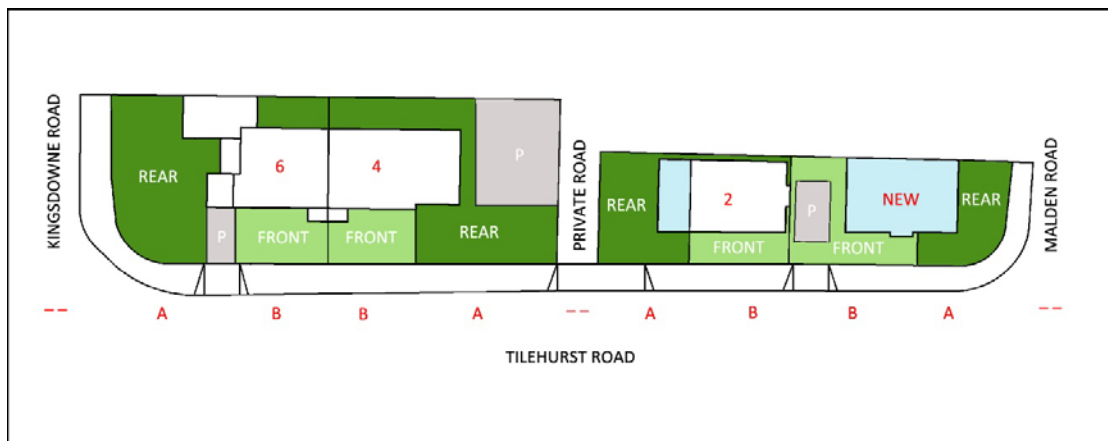
2.17 While adequate separation distances are maintained according to local policy is also noteworthy that Design of Residential Extensions (2006) is in excess of 15 years old. The most up to date published thinking around the subject at hand is the superseded draft document Housing Design Quality and Standards SPD (2020) C5.1.2 which states the following:

" In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance between back to back homes (typically 18-21m). However, this is a very crude measure, and adhering rigidly to these distances can limit the variety of urban spaces and housing types in the city, and **unnecessarily lowers density**. Good Quality Homes For All Londoners- Foreword adopts daylight factors to determine offset distances between buildings rather than standard distances. As building heights increase, greater distance should be created between buildings to ensure adequate daylight into the dwellings. "

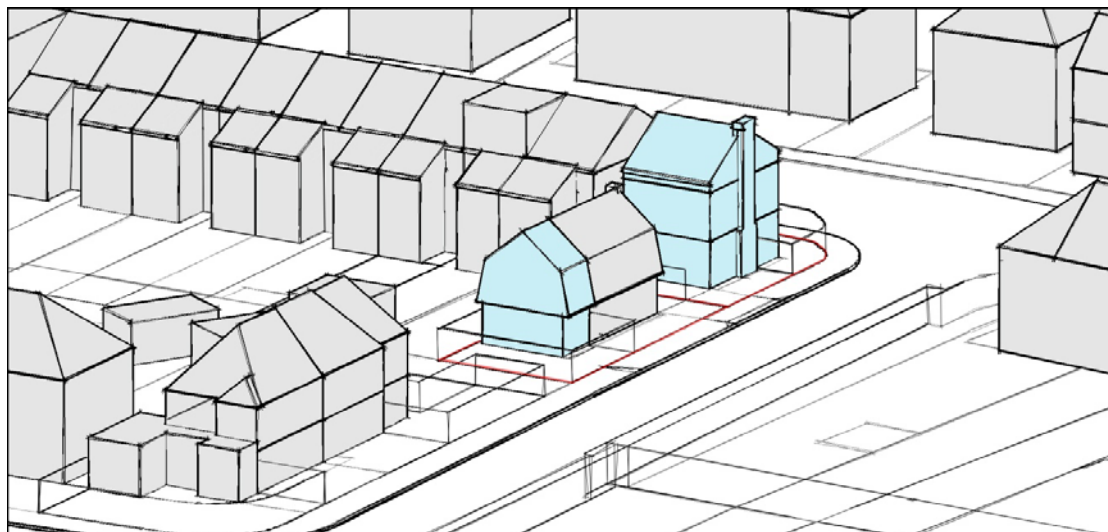
2.18 With this in mind it is worth noting that the 25 degree rule is also met in all locations where new development is proposed near existing openings to habitable rooms.

2.19 URBAN RHYTHM; MASSING; CHARACTER OF THE STREETScape

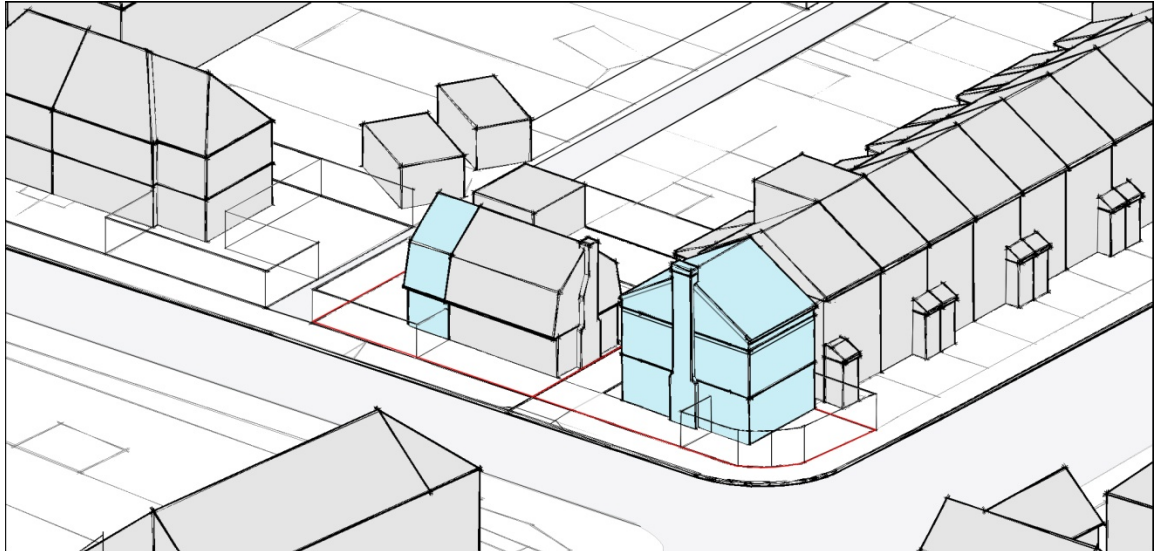
2.20 The proposed development is compatible with the surrounding townscape and reflects the urban rhythm of the adjacent development fronting onto Tilehurst Road. The diagram below illustrates how the proposed development improves the coherence of the streetscape through continuation of the established and existing morphological character



2.21 The sketch models below illustrate how the proposed development provides adequate massing and scale in relation to the adjoining urban context. The ridge height, eaves height and form of the proposed new building is the same as the neighbouring terrace on Malden Road.



2.22 The two buildings positioned "side-to-side" are read as a pair that provide each other with counterpoise, integration and aesthetic bridging that stitches the urban fabric between Tilehurst Road and Malden Road together. This is achieved both architecturally through massing and also through the extension of active streetscape providing an additional 10m of low walled (600mm) vegetative scenery and 11m of architectural frontage.



2.23 The comparative principal elevations on Tilehurst Road are inserted below illustrating how the extension to the existing property 2 Tilehurst Road and the addition of the corner infill property improve the poor quality of the street scene.



2.24 The existing blank side elevation of 126 Malden Road is back-grounded with a facade of architectural interest that relates to the both the existing terrace on Malden Road and existing detached house through detailing; fenestration and materiality.

2.25 The comparative street facing elevations on Malden Road also show an improved compatibility with the existing terrace line. The presence of a "rear garden" fronting onto Malden Road is a pre-existing site condition and should therefore be understood as a preservation of the existing character rather than an anomaly.



2.26 AMENITY SPACE AND PLOT SIZES

2.27 The diagram below shows the basic layout of the internal and external areas of the site. The development proposal has a site coverage ratio of 40% whereby the existing dwelling is apportioned with 65.1m² of amenity space and the proposed new dwelling is apportioned with 84.9m² of amenity space.



2.28 The Sutton Local Plan 2018 Policy 9.6 States the following:

" The Mayor of London's Housing Supplementary Planning Guidance (SPG) 2016 sets a standard of 5m² of private outdoor space for 1 to 2-person dwellings and an extra 1m² for each additional person. It is considered that in a suburban setting, typical of large parts of the borough, this

minimum private outdoor space standard is inappropriate. The council's Urban Design Guide SPD (2.14) has minimum standards of 25m² for flats or one-bedroom units, 40m² for two-bedroom units and 70m² for three-bedroom units. **In some cases, particularly in Areas of Potential Intensification, this minimum standard may be considered too onerous.** Therefore it is considered more appropriate to use the council's Urban Design Guide SPD or any successor document as a **guide, rather than minimum standards**, taking into account surrounding local character. "

2.29 As such the proposed amenity provision of 84.9m² and 65.1m² should be considered generous in relation to the London Plan Housing SPG (2017) which in this case would specify a minimum standard of 7m² per dwelling (3 bed 4ppl).

2.30 Sutton's Urban Design Guide (2008) Paragraph 3.24 additionally states the following

" Corner properties within SRQ areas may deliver higher density housing such as flats. In accordance with UDP Policy BE14 the Council will adopt **flexible standards of amenity space provision and parking provision within SRQ areas.** "

2.31 Therefore since the development site exists on a corner site within an SRQ "area of potential intensification" it should be fair to say that the specification of 70m² of private amenity space for a 3 bed unit would in this case be overly "onerous" and the provision provided is materially adequate by local and regional policy.

2.32 Such flexibility is built into policy and not meeting the recommendation of 70m² should not be viewed as a material consideration in favour of refusal in a delimited "urban" setting.

2.33 Flexible standards in relation to amenity space are applied regularly on a case by case basis often outside of SRQ areas and where no amenity provision is provided at all.

2.34 Paragraph 3.25 of the Urban Design Guide (2008) additionally states the following:

" In certain other instances development on Corner properties may be suitable, such as highlighting a gateway or signifying a change in the urban form. This includes development that highlights an entrance or gateway into the borough, an SRQ area or an employment area. In these instances development may be emphasised by an increased height, higher density, larger form, detailing, colouring or materials. "

2.35 With this in mind it should be reasonable to say that the relatively smaller plot and amenity spaces provided can be viewed as being emphatic of a higher density that is entirely suitable according to local policy. As to 2.34 this would be by virtue of the development site's "corner location"; "SRQ location" and "gateway location" on the boundary of said SRQ area.

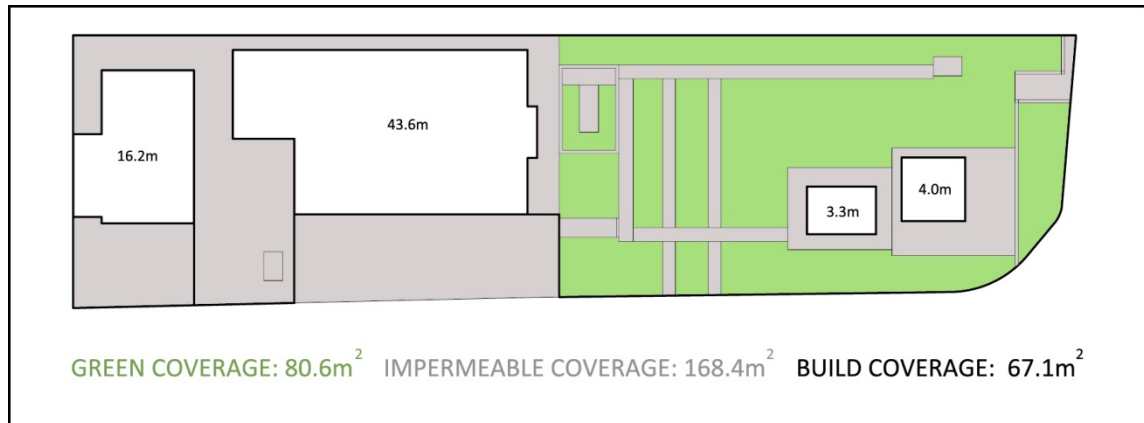
2.36 While the proposed private amenity spaces are smaller than the flexible recommendations of the Sutton Local Plan (2018), the provision is large enough for most basic residential purposes such as those discussed by the superseded draft document Housing Design Quality and Standards SPD (2020) C4.2.2:

" Private outside space standards have been established in the same way as internal space standards by considering the space required for furniture, access and activities... These minimum areas and dimensions provide sufficient space for either a meal around a small table, clothes drying, or for a family to sit outside with visitors "

2.37 For other purposes where a more spacious setting is required it should be noted that the entrance of Cheam Recreation Ground is within 100m of the development site.

2.38 GREEN COVERAGE; FLOOD RISK AND SUSTAINABLE URBAN DRAINAGE

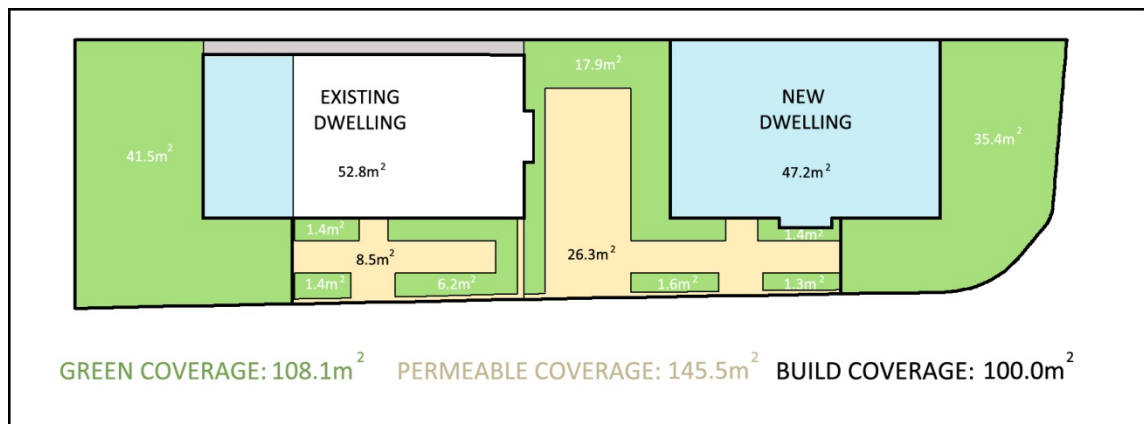
2.39 The site as existing is shown below in plan form to provide a means of accounting in relation to green coverage, impermeable coverage and the amount of metric land covered by existing buildings.



2.40 The site as proposed has also been accounted for to illustrate that there is a modest increase in the site coverage ratio from 27% to 40% (An increase of 13%),

2.41 However the green coverage area has increased from 32% to 43% (An increase of 11%).

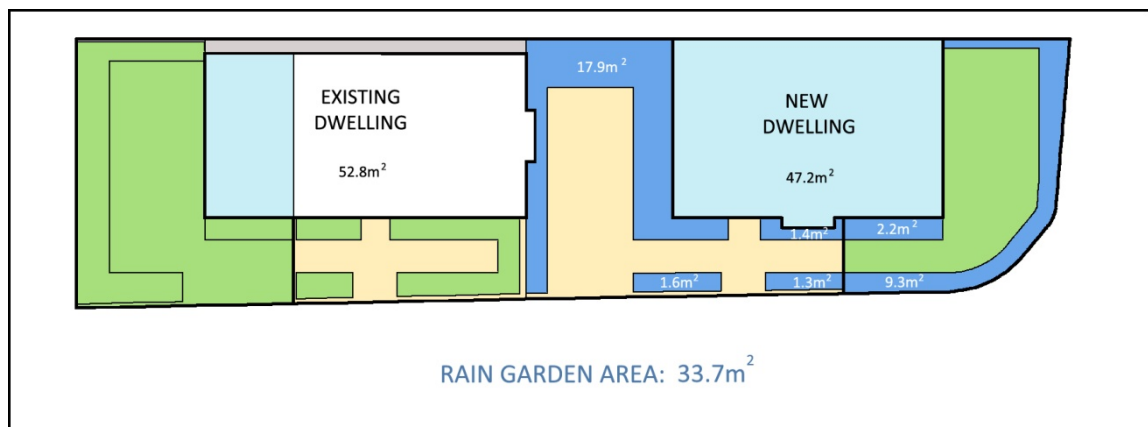
2.42 And additionally the permeable coverage area has increased from 32% to 58% (An increase of 26%).



2.43 Since there is an increase in green coverage and the net loss of vegetative land is less than 100m² there is no need to prepare a site specific biodiversity report and strategy. The proposal is also a minor proposal (Less than 10 units) and is not subject to either "biodiversity accounting" or "urban greening factors" as to Sutton's Local Plan Technical Guidance Note (2018).

2.44 The increase in permeable coverage in conjunction with this increase in green coverage will help to mediate the local temperature in relation to London's heat island effect while additionally improving visual amenity in the public and private outdoor spaces.

- 2.45** The site is situated in "flood risk zone 1" and is not located in a "critical urban drainage area". There are no tangible flood risks to the site and therefore a site specific FRA is not required as to Policy 32 of the Sutton Local Plan (2018).
- 2.46** A separate SUDS report has been produced for the Sustainability Officer which calculates the storage volume required to accommodate the $M_{100-6hr}$ storm event on site at $2.21m^3$ (which factors in a 40% increase to account for climate change).
- 2.47** In order to store this volume in close proximity to buildings due to the tight nature of the site, planted rain garden channels will be used that attenuate the required storage volume over a large potential surface area designated in the Diagram below:

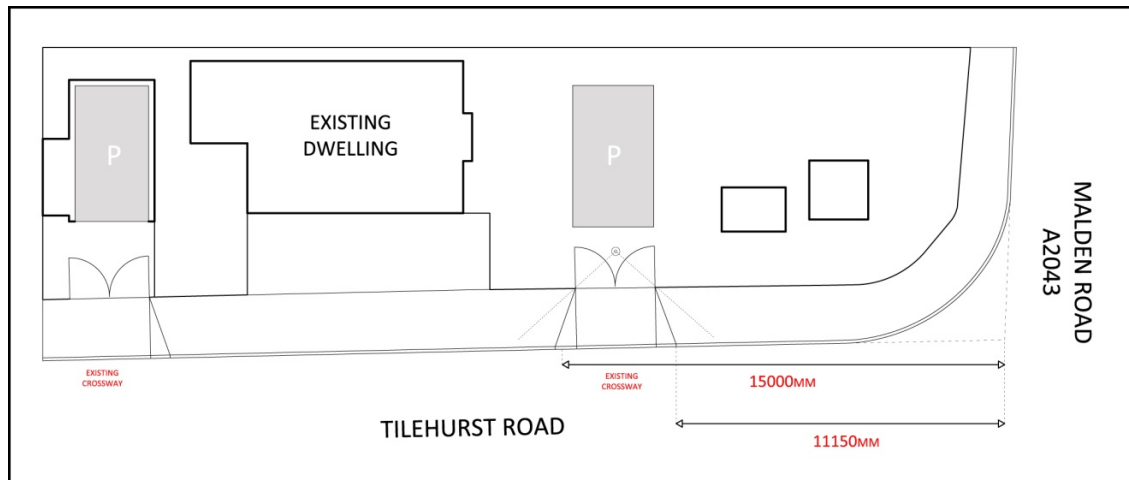


- 2.49** The general composition of the proposed bio-retention system involves a structural planter wall with concrete or other impervious container with a waterproof membrane. Within these containers are placed a sub-base of around 30cm; around 30cm of topsoil and then 10cm of freeboard. Together this provides roughly 20cm of water storage depth as to Designing Rain Gardens: A Practical Guide by Urban Design London.
- 2.50** Based on the required storage Volume of $2.21m^3$ this would only equate to $11.1m^2$ of required surface area which provides some flexibility in design once other elements and constraints are brought together including conditions attached by the Bio-Diversity Officer and the finalisation of a landscape and planting strategy that specifies materials and incorporates vegetative plants of varying heights.
- 2.48** As stated in the SuDS Manual (p161):

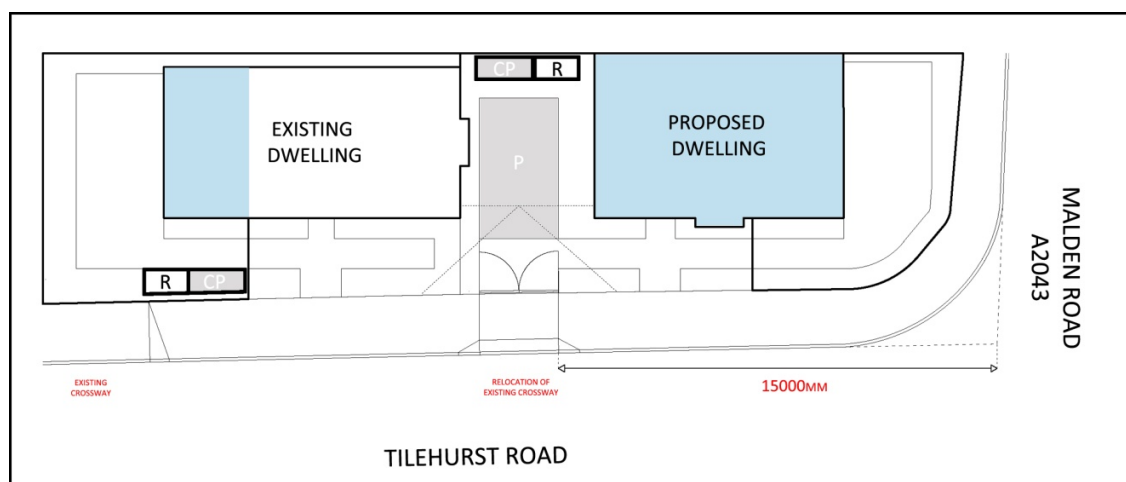
" Planted channels can provide conveyance routes that treat runoff and attenuate flows. They can be in the form of ground-level planted channels and raised planters. These can form privacy strips along interfaces to reaffirm public/private boundaries and support urban greening. "

2.49 VEHICLE PARKING, CYCLE PARKING AND REFUSE:

2.50 The existing arrangement of the site is depicted in the diagram below showing the two existing vehicle crossovers that serve the site and the distance from Malden Road (A2043):



2.51 The proposed arrangement of the site as to vehicle parking, cycle parking and refuse is also shown below:



2.52 Relocation of the existing vehicle crossover is proposed to bring it to within an acceptable distance of 15m from the nearby classified A road. In addition to this low fronted walls of 600mm are specified with adequate visibility splays for pedestrian and particularly child safety.

2.53 The parking space provided does not dominate the frontage and provides a "min/max" parking allowance for the proposed new dwelling. The existing dwelling is not assigned an onsite parking bay but this is not overtly specified by Policy 37 and the Urban Design Guide (2008) incorporates the adoption of flexible standard of parking provision within SRQ Areas (3.24).

2.54 Cycle parking for 2 bikes (as to the London plan minimum standards) and refuse stores are specified within amenity spaces for both properties. These are marked with "R" and "CP" respectively. The shed enclosures will be secure and specified with green roofs in order to maintain the green coverage of the site.

2.55 DAYLIGHT AND OVERSHADOWING

2.56 Policy 29 of the Sutton Local Plan (2018) delegates to BR209: Site Layout Planning for Daylight and Sunlight (2011) on the amenity related matters of day-lighting and overshadowing.

2.57 The proposed development is sufficiently spaced from all habitable rooms in neighbouring buildings as to meet the 25 degree rule in all cases so there is no tangible impact on daylight to be considered.

2.58 As to the TCPA (2020); a kitchen with no dining table is not a habitable room and neither is a hall or a WC; so any possible impact upon 2 Tilehurst Road is solved in design (As to 2.13 above).

2.59 In regard to overshadowing BRE 209 (2011) paragraph 3.3.17 sets out the material criteria as following:

" It is recommended that for it to appear adequately sunlit throughout the year, at least half of a Garden or Amenity Area should receive **at least two hours of sunlight on 21 March**. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive 2 hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March. "

2.60 In addition to this it is BRE 209 (2011) also specifies in paragraph 3.3.8 that:

"Sunlight at an altitude of 10° or less does not count, because it is likely to be blocked by low level planting anyway. In working out the total area to be considered driveways and hard standings for cars should be left out. Around housing, front gardens which are relatively small and visible from the public footpaths should be omitted; **only the main back garden should be analysed.**"

2.61 126 Malden Road is not a public establishment with restricted hours of use such as a cafe or a school. As such, attempts to restrict the potential hours of use to any artificially defined range could never be employed as a reasonable or effective strategy to assess the impact of overshadowing.

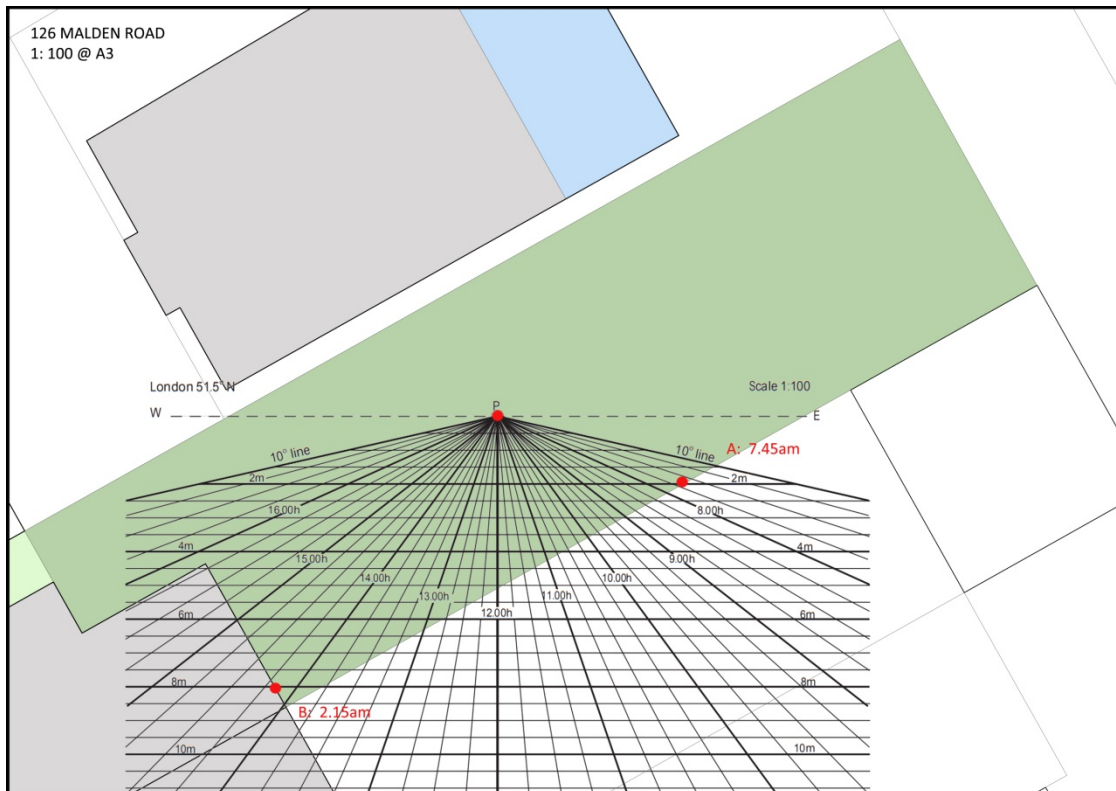
2.62 As part of an evidence based approach the 3 gardens in question have been assessed using BRE 209 (2011) Appendix G using the appropriate "sun on ground indicator" (1:100 overlay) as suggested by paragraph 3.3.7.

2.63 The results indicate that all the gardens receive adequate sunlight which would stand as a material consideration in favour of the proposal.

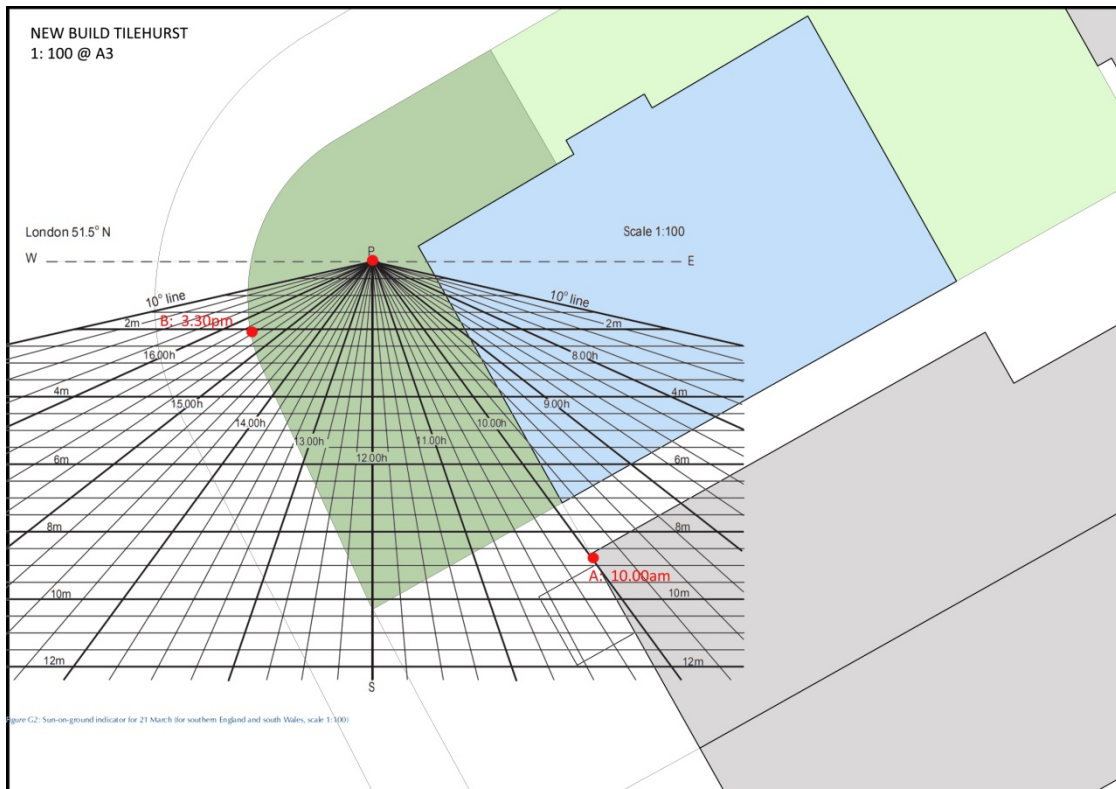
2.64 It is appreciated that there could theoretically be some loss of sun on the ground in the summer months. However on the designated date of the 21st March which is used to materially assess overshadowing, the property receives an ample provision of sunlight. If there is loss of light in the summer months then this is unfortunate but should not be significant enough to be a material consideration in the evaluation of the proposal.

2.65 The impact of the development proposal is materially negligible as to policy and the garden at 126 Malden Road receives hours of sunlight in excess of 3 times the threshold value.

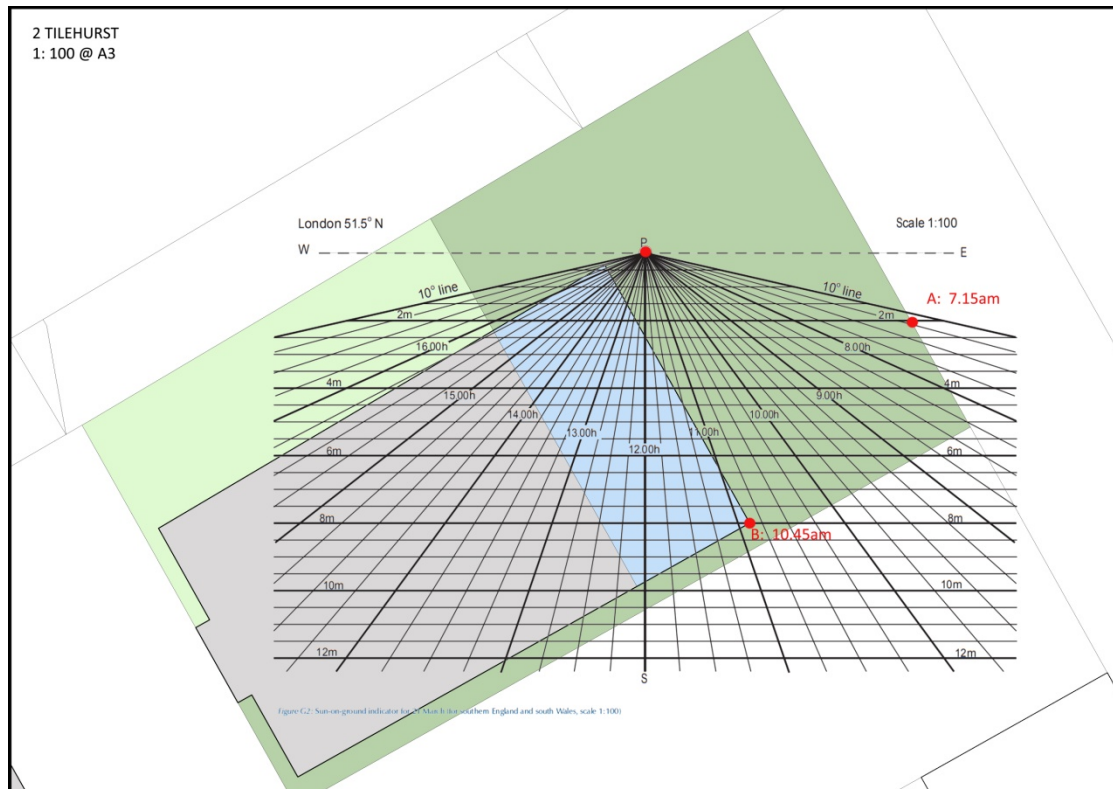
2.66 The calculation of sun on the ground for the garden at 126 Malden Road below shows that mid-point P receives **6.5 hours** of sunlight on the 21st March.



2.67 The calculation of sun on the ground for the proposed garden at the new build address on Tilehurst Road below shows that mid-point P receives **5.5 hours** of sunlight on the 21st March.



2.68 The calculation of sun on the ground for the proposed garden at 2 Tilehurst Road below shows that mid-point P receives **2.5 hours** of sunlight on the 21st March.



2.69 In regard to overshadowing it should be concluded that the site capacity has been optimised while providing an acceptable amount of sunlight to both development sites. The garden at 126 Malden Road receives excess sunlight over 3 times the threshold value and in this regard it would not be reasonable to sterilise the site with considerations that are not material.

2.70 INTERNAL DESIGN STANDARDS

2.71 Relevant space metrics and minimum design standards are set out regionally in the London Plan (2021) D6 F1-F8 and locally in Appendix A of the Urban Design Guide (2008). D6 3.6.11 of the London Plan (2021) also alludes to a single guidance document which clearly sets out the standards which need to be met in order to implement Policy D6. This document currently exists in consultation draft form as the Housing Design Standards LPG (2022) which will also be referred to as a guide.

2.72 The proposed new dwelling has a GIA of 98.8m² which is adequate for 3 bed 4 person dwelling place split over 3 stories.

2.73 The 2 storey extension and internal alterations to the original house at 2 Tilehurst Road creates a proposed GIA of 84.1m² which is additionally adequate for a 3 bed 4 person dwelling split over 2 stories.

2.74 Table 1 from the Technical housing Standards- nationally described space standards DCLG (2015) is extracted below with the appropriate boxes highlighted. Policy 9 of the Sutton Local Plan (2018) delegates to the London Plan (2021) on space standards which respectively adopts table 1 as D6 F1 Table 3.1.

Table 1 - Minimum gross internal floor areas and storage (m²)

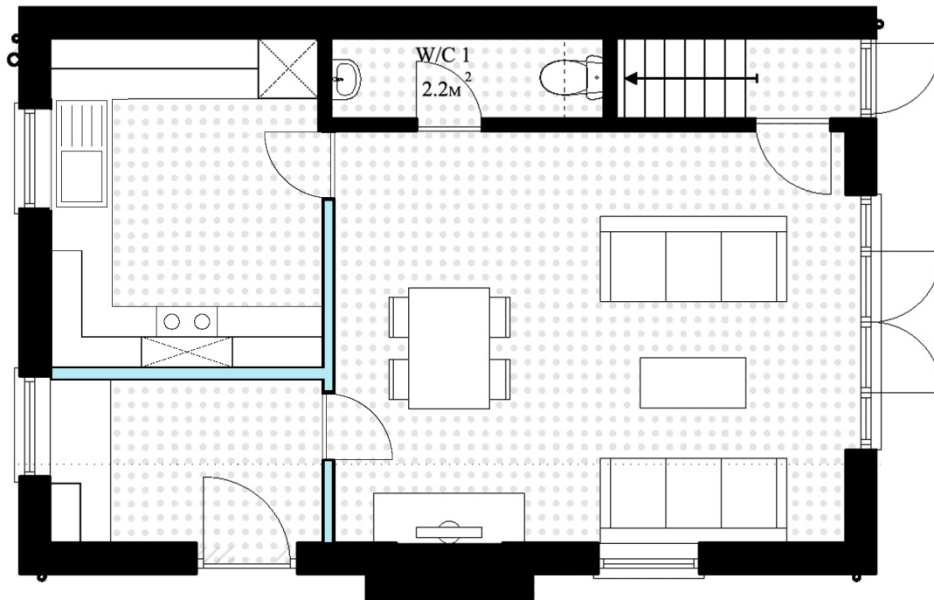
| Number of bedrooms(b) | Number of bed spaces (persons) | 1 storey dwellings | 2 storey dwellings | 3 storey dwellings | Built-in storage |
|-----------------------|--------------------------------|--------------------|--------------------|--------------------|------------------|
| 1b | 1p | 39 (37) * | | | 1.0 |
| | 2p | 50 | 58 | | 1.5 |
| 2b | 3p | 61 | 70 | | 2.0 |
| | 4p | 70 | 79 | | |
| 3b | 4p | 74 | 84 | 90 | 2.5 |
| | 5p | 86 | 93 | 99 | |
| | 6p | 95 | 102 | 108 | |
| 4b | 5p | 90 | 97 | 103 | 3.0 |
| | 6p | 99 | 106 | 112 | |
| | 7p | 108 | 115 | 121 | |
| | 8p | 117 | 124 | 130 | |
| 5b | 6p | 103 | 110 | 116 | 3.5 |
| | 7p | 112 | 119 | 125 | |
| | 8p | 121 | 128 | 134 | |
| 6b | 7p | 116 | 123 | 129 | 4.0 |
| | 8p | 125 | 132 | 138 | |

2.75 Sutton Local Plan (2018) Policy 9.3 also indicates that 44% of Sutton's market housing demand is in the form of 3 bed dwellings and specifies that all new development outside of Sutton's town centre should seek to provide a minimum of 50% of all dwellings on site as having 3 bedrooms or more. The proposal of two 3 bed units exceeds the objective criteria.

2.76 The Table below shows a schedule of rooms, room areas and room sizes adjacent to the specified technical standards set out in Sutton's Urban Design Guide (2008) and London Plan (2021):

| Room | 2 Tilehurst PROPOSED | New Dwelling PROPOSED | UDG (2008) STANDARD | D6 F1-F8 (2020) STANDARD |
|-----------------------|---|---|--------------------------------------|--|
| Bed 1 (principle) | 11.5m² (4.4 x 2.6m) | 15.3m² (4.6m x 3.2m) | 11.0m² 2.4m (w) | 11.5m² 2.75m (w) |
| Bed 2 (single) | 8.9m² (3.4 x 2.6m) | 12.7m² (3.9m x 3.3m) | 6.5m² 2.1 m (w) | 7.5m² 2.15m (w) |
| Bed 3 (single) | 8.7m² (3.1m x 2.6m) | 10.9m² (3.9m x 2.6m) | 6.5m² 2.1 m (w) | 7.5m² 2.15m (w) |
| Kitchen (A) | 8.7m² (3.1m x 2.8m) | -- | 7.2m² | -- |
| Living-Dining (B) | 25.7m² (4.6m x 6.3m) | -- | 22.0m² | -- |
| Kitchen-Living-Dining | 34.4m² (A + B) | 34.9m² (7.9m x 5m) | 29.2m² | 29.0m² (LPG C2.4) |
| W/C 1 | -- | 2.2m² (2.7m x 0.8m) | -- | -- |
| W/C 2 | -- | 3.0m² (1.9m x 1.6m) | -- | -- |
| Bath. 1 | 4.9m² (3.1m x 1.6m) | 6.2m² (2.7m x 2.3m) | 2.7m² 1.4m (w) | -- |
| Bath. 2 | 3.4m² (2.1m x 1.6m) | -- | 2.7m² 1.4m (w) | -- |

- 2.77** The table shows that metrically all standards are met both locally and regionally.
- 2.78** The floor to ceiling heights of the proposed new dwelling height meet the required ceiling heights of 2.5m across 75% of the proposed GIA as to D6 3.6.3.
- 2.79** There is 14.3m² of floor space on the top floor with a lower headroom between 1.5m and 2.5m. This equates to 14.5% of the total GIA.
- 2.80** The Housing Design Standards LPG (Draft 2022) sets out further standards for the accommodation of a specified furniture schedule set out in Appendix A. Fully furnished floor Plans at 1:100 scale have been provided to show full compliance with this schedule (S001-S012).
- 2.81** The Housing Design Standards LPG (Draft 2022) C4 also sets out standards in relation to aspect, orientation and daylight. The design proposal meets these requirements in full.
- 2.82** All habitable rooms have an outlook that provides at least one opening window that provides a view out when seated (1200mm), and the best views out onto rear amenity spaces are given to the primary living areas.
- 2.83** Both dwellings are additionally "dual-aspect".
- 2.84** The proposed new dwelling has an open plan "kitchen-living-dining" space. The alternative arrangement Plan presented below indicates that it would be possible to partition this space as to C3.1:



3.00 OVERVIEW

- 3.01** Overall it is considered that site capacity has been optimised while meeting all targets and limitations set out in the local design and management framework.
- 3.02** The proposal is a positive addition to the street scene and brings the site into deeper accord with the existing character of both Tilehurst and Malden Road.
- 3.03** Where a flexible approach to requirements has been applied this flexibility is built into Policy.
- 3.04** The proposed intensification is suitable in regard to the site's corner infill location, SRQ location and gateway location that marks the entry into the "urban" part of Cheam along Malden Road towards the Broadway and local town centre.
- 3.05** There are no considerations that suggest the proposal causes any material harm to the amenity of either the host dwelling or the surrounding properties. It has been shown that the garden at 126 Malden Road receives excess sunlight over 3 times the materially specified threshold value.
- 3.06** On balance the proposal is highly positive and regenerative of a significant site with poor character. To contrive this poor character as a feature of the street scene would be materially contradicted by both the site's delimitation in an "Urban" SRQ area and the case decisions to approve A2015/71241 and A2017/77966.

END ⁽⁶⁷⁷⁵⁾