

PLANNING STATEMENT

260 Coombe Lane, Raynes Park, London SW20 0RW, UK

January 2024



A. INTRODUCTION

- A.1 This Planning Statement has been prepared to accompany a planning submission to the London Borough of Merton in respect to the proposed development at 260 Coombe Lane, Raynes Park, London SW20 0RW, UK.
- A.2 The property is currently a two-bedroom detached bungalow, and a detached 1x car garage sited on a triangular lot next to the junction of Coombe Lane and Cambridge Road.
- A.3 Pre-Application Advice (ref: 23/P1125) was initially sought for a similar proposed development. The same scheme has been submitted in this planning application, while also addressing all of the concerns raised by the case officer during Pre-Application Advice.
- A.4 This application proposes the demolition of the existing bungalow and garage, and the erection of a two-storey, detached residential building with accommodations at the basement and roof space levels comprising six (6) self-contained flats (2-3b4p, 3-2b3p, and 1-1b1p) and six (6) off-street car parking provisions.
- A.5 The description of this planning application is:
- Demolition of the existing bungalow, and erection of two-storey residential building with accommodations at the basement and roof space levels comprising six (6) self-contained flats**
- A.6 The overall objective of the development proposal is to address the need for quality housing in the London Borough of Merton, particularly in Raynes Park, whilst enriching and not disrupting the established local character of the residential community along Coombe Lane.
- A.7 This Planning Statement describes the application proposal in more detail, and in the context of relevant policies. It should be read in conjunction with the following documents:
- Location Plan;
 - Existing and Proposed Site Plan;
 - Existing Floor Plans;
 - Proposed Floor Plans, Elevations and Sections;
 - Refuse Bin and Cycle Storage Details;
 - Fencing Plan and Details;
 - External Materials Schedule;
 - Daylight and Sunlight Assessment Report;
 - Energy and Water Efficiency Report;
 - Arboricultural Impact Assessment Report and Tree Survey;
 - Landscape Plan and Details;
 - Flood Risk Assessment and Sustainable Drainage Strategy (SuDS);
 - Basement Impact Assessment and Ground Investigation Report;
 - Design and Access Statement;
 - Air Quality Neutral Assessment;
 - Fire Statement; and
 - Community Infrastructure Levy (CIL)

B. PLANNING CONTEXT

Site and Surroundings

- B.1 The application site is situated in the London Borough of Merton administrative area, within the policy area of Raynes Park. The site currently consists of a two-bedroom detached property, is in use as a dwellinghouse, and will be accessed directly from Coombe Lane. It has a front and back garden with an existing single-storey detached garage along the right side of the property boundary.
- B.2 The area surrounding the site is almost entirely residential consisting of two-storey detached and semi-detached houses of varying architectural styles. Most of which have converted their loft into habitable spaces as evidenced by existing roof dormer additions and rooflight installations.
- B.3 The northeastern side of the site is bounded by a 2.8 m tarmacked access road to 258 Coombe Lane. This road leads to a bellmouth for ease of access towards the junction of Coombe Lane and Cambridge Road.
- B.4 The site itself is not located within a Conservation Area. However, just across the access road to the right is a large area for allotments currently designated as Metropolitan Open Land (MOL), Open Space, and within the Bathgate Road Conservation Area.
- B.5 The property is not a listed building nor is it in close proximity to any.
- B.6 The nearest parks and recreation grounds are Cottenham Park Recreation Ground, Raynes Park Sports Ground, and Holland Gardens Open Space. Primary schools are located at least 300 m away, and Lambdon Road Medical Practice is only 900 m away. Furthermore, Raynes Park Local Centre is only 700 m away.



Figure 2 – Street-level view of 260 Coombe Lane, featuring existing bellmouth for ease of access to site and adjacent access road for 258 Coombe Lane (source: Google Street View; captured August 2022; accessed January 2024)

Public Transport Provision and Accessibility

- B.7 The site has considerable access to public transport, as it is located approximately 900 m from Raynes Park station. The Cambridge Road Bus Stop is only a 1-min walk or 85 m away. Though the site's PTAL (Public Transport Accessibility Level) rating is only 1b, it is worth noting that the PTAL rating less than 100 m away is 3.



Figure 1 – Aerial view of 260 Coombe Lane (source: Google Maps; accessed January 2024)

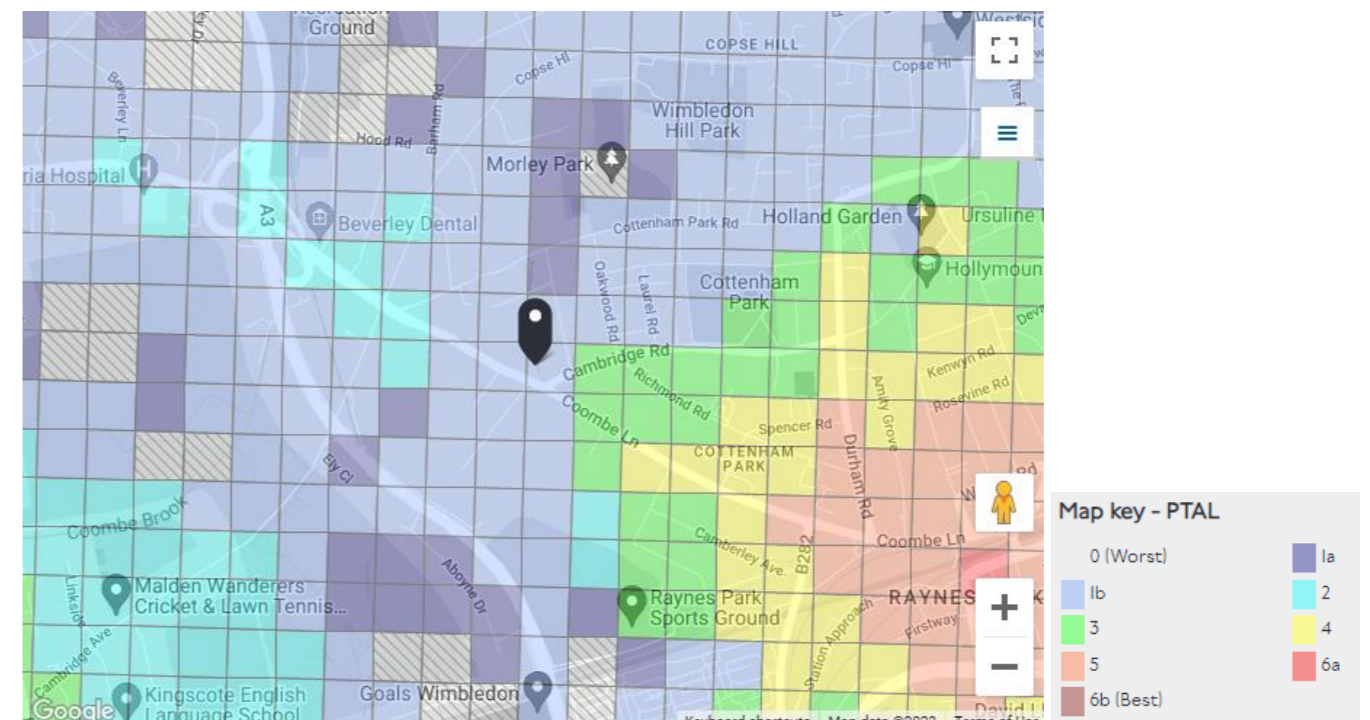


Figure 3 – PTAL Map of site showing a rating of 1b (source: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>; accessed January 2024)

Planning History

Pre-Application Advice

- B.8 A Pre-Application Advice (ref: 23/P1125) was recently sought prior to the submission of this full planning application.
- B.9 The conclusion stated how the proposed development would have been likely deemed acceptable with respect to the following material planning considerations:
- Principle of Development – Demolition of existing dwelling and its replacement with larger dwelling with six self-contained flats would have likely been supported given limited architectural value of existing dwelling.
 - Design, Character and Appearance – The overall scale, height, and design of the new building would have likely been considered appropriate for the site, and would not detract from the character and appearance of the street scene or surrounding area, subject to detailed design.
 - Neighbouring Amenity – The proposal would have been likely deemed to not caused harm to neighbouring amenity, subject to a Daylight/Sunlight Impact Report being undertaken.
- B.10 However, the proposed development at the state of the submission for Pre-Application Advice would still likely have not been overall supported. Listed below are areas for improvement. All of which have been addressed as demonstrated in this Planning Statement, alongside all other relevant documents that accompany this planning application.
- Re-position the outdoor terrace for the ground floor Flat 2 so that it does not oversail the basement flat windows below;
 - Move the front first floor terrace further away from the flank elevation to prevent overlooking to the front bay windows of number 262;
 - Provide a street scene drawing to ascertain the building height in relation to neighbouring properties;
 - Provide a Daylight/Sunlight Assessment/report to demonstrate the impact on neighbouring properties as well as the internal light levels of the proposed new flats;
 - Reduce the size and number of rear windows at first and second floor level in order to reduce the impact of overlooking to number 262;
 - Have orange/brown clay tiles for the roof structure; and
 - Meet the minimum standards for outdoor amenity space provision (5 sqm +) in accordance with Council Policy.

Property's Planning History

- B.11 There are no recent relevant planning decisions on the property.

Other Decided Planning Applications relevant to this application

- B.12 Relevant planning applications within the London Borough of Merton that bear resemblance to this proposal are set out below:

258 Coombe Lane [15/P2082](#) – Demolition of the existing house and erection of six semi-detached houses

- Appeal Allowed after initial Refused Planning Permission – September 2016
- This planning application was allowed an appeal after initial refusal of planning permission for demolition of the existing house along Coombe Lane, and the erection of a multi-storey development with

basement to create multiple self-contained residential units – similar to this planning application for 260 Coombe Lane.

- This proposed development at 260 Coombe Lane is guided by the appeal decision of 258 Coombe Lane's planning application. This Planning Statement, alongside all other documents accompanying this planning application, would show how the following factors have been considered and properly addressed:
 - Bulk, scale, massing, and appearance of the development proposal, particularly with how it relates to the existing properties in the vicinity;
 - Bulk, scale, massing, and appearance of the development proposal, particularly with how it relates to the neighbouring Metropolitan Open Land, Open Space, and Conservation Area; and
 - Conservation of significant elements of the site's pre-existing natural environment, its integration to the development proposal, and proposed additional design features to ensure sustainability of the site's natural characteristics, and the proposed built features.

33 Lingfield Road [19/P2611](#) – Demolition of the existing dwellinghouse and erection of three-storey residential block with lower ground level, creating 4 x 3 bed flats

- Grant Permission subject to conditions and section 106 agreement – September 2020
- This planning application was granted permission for demolition of the existing single dwellinghouse, and the erection of a multi-storey development with a basement to create multiple self-contained flats in an area that should largely consider its relationship to a Conservation Area– similar to this planning application for 260 Coombe Lane.

22 Commonsides West [16/P2966](#) – Demolition of dwellinghouse and erection of a new 3-storey residential block comprising 4 x 2 bed flats and 1 x 1 bed flat

- Grant Permission subject to conditions– February 2017
- This planning application was granted permission for demolition of the existing single dwellinghouse, and the erection of a multi-storey development to create multiple self-contained flats in an area that should largely consider its relationship to a Conservation Area– similar to this planning application for 260 Coombe Lane.

C. PROPOSED DEVELOPMENT

C.1 The development proposal is for erection of a two-storey residential building with accommodations at the basement and roof space levels comprising of six (6) self-contained flats.

C.2 The schedule of proposed accommodation is as follows:

Proposed Self-contained Flats	Level/s	Bedrooms & Persons	Proposed Internal Floor Area (sqm)	Proposed Private External Amenity (sqm)
Flat 1	Basement & Ground	3b4p	91.70	50.54 (44.28+6.26)
Flat 2	Ground	2b3p	62.57	7.19
Flat 3	Basement	3b4p	77.39	62.03
Flat 4	First	1b1p	42.70	5.25
Flat 5	First	2b3p	61.55	10.89 (5.64+5.25)
Flat 6	Roof space	2b3p	81.25	8.40 (4.20+4.20)

Table 1 – Proposed Accommodation Schedule at 260 Coombe Lane

- C.3 Each of the six (6) self-contained flats would have their own private external amenity spaces in the form of either rear gardens, terraces, or even both.
- C.4 A modest communal garden space is located at the front of the property, just by the property's entryway. This is intended to mask the six (6) off-street car parking bays at the front of the property, while also providing lush landscaping that softens the hard exterior of the proposed multi-storey residential building.
- C.5 Six (6) off-street car parking bays are proposed to be located at the front of the property just behind the lush landscaping of the modest communal garden space. The number of car parking provisions coincides with the number of proposed self-contained units.
- C.6 Eleven (11) cycle storage facilities for the six (6) proposed self-contained units would be located at the front of the property for ease of utility of the property's future occupiers. It would all be secured via a pedestrian gate to the property and would be in a well-lit location.
- C.7 Six (6) refuse bins for the six (6) proposed self-contained flats would be located at the front of the property for ease of access during collection. It would be secured via a pedestrian gate to the property but would also be surrounded by proposed trees and shrubbery, so as not to have a detrimental impact to the area's character and appearance.
- C.8 This proposal follows a Pre-Application Advice (ref: 23/P1125) for the demolition of the existing bungalow and erection of a two-storey dwelling with six (6) self-contained flats. All areas for improvement stated in the Pre-Application Advice's conclusion have been addressed in this application.
- C.9 A comprehensive description of the proposal will be set out in the Design and Access Statement that accompanies this planning application.



Figure 4 – Proposed Block Plan of 260 Coombe Lane for demolition of existing bungalow, and erection of a two-storey dwelling with accommodations at the basement and roof space levels comprising six (6) self-contained flats

D. PLANNING POLICY

- D.1 This section provides an analysis of the planning policy context in which the proposed development should be considered in accordance with the relevant planning legislation and national policy guidance.
- D.2 Planning decisions in England and Wales should be taken in accordance with the development plan, unless material considerations indicate otherwise. This statutory requirement is set out in Section 38 (6) of the Planning and Compulsory Purchase Act of 2004.
- D.3 The National Planning Policy Framework (NPPF) is clear in Paragraph 11 that development that accords with an up-to-date Local Plan should be approved without delay.

STATUTORY DEVELOPMENT PLAN

- D.4 The statutory development plan for the London Borough of Merton consists of planning policies that are considered relevant to the determination of the planning application, namely:

The London Plan 2021

- GG2 Making best use of land
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D6 Housing quality and standards
- D10 Basement development
- D12 Fire safety
- H1 Increasing housing supply
- H2 Small sites
- H10 Housing size mix
- HC1 Heritage
- G1 Green infrastructure
- G3 Metropolitan Open Land
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI 1 Improving air quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy infrastructure
- SI 4 Managing heat risk
- SI 7 Reducing waste and supporting the circular economy
- SI 8 Waste capacity and net waste self-sufficiency
- SI 12 Flood risk management
- SI 13 Sustainable drainage
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking

Merton Local Development Framework Core Planning Strategy 2011

- CS 4 Raynes Park Sub-Area
- CS 8 Housing Choice
- CS 9 Housing provision
- CS 13 Open space, nature conservation, leisure and culture

- CS 14 Design
- CS 15 Climate Change
- CS 16 Flood Risk Management
- CS 17 Waste management
- CS 18 Active transport
- CS 20 Parking servicing and delivery

Merton Sites and Policies Plan (SPP) 2014 and Policies Map 2014

- DM H2 Housing mix
- DM O1 Open Space
- DM O2 Nature conservation, trees, hedges and landscape features
- DM D1 Urban design and the public realm
- DM D2 Design considerations in all developments
- DM D3 Alterations and extensions to existing buildings
- DM D4 Managing heritage assets
- DM F1 Support for flood risk management
- DM F2 Sustainable urban Drainage Systems 'SuDS'; and Wastewater and Water Infrastructure
- DM T1 Support for sustainable transport and active travel
- DM T2 Transport impacts of development
- DM T3 Car parking and servicing standards

MATERIAL PLANNING CONSIDERATIONS

- D.5 Whilst not forming part of the statutory development plan, the following documents remain important material planning considerations for the determination of planning applications in Merton:

- National Planning Policy Framework 2021
- The New Local Plan for Merton
- London Plan Guidance: Housing Design Standards 2023
- London Plan Guidance: Air Quality Neutral 2023
- Merton Basement and Subterranean SPD 2018

National Planning Policy Framework 2021

- D.6 On 20th July 2021, the government adopted the National Planning Policy Framework (NPPF), which provides a consolidated framework of planning policy that replaces all former National Planning Policy Framework documents.
- D.7 The NPPF outlines the presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives: an economic objective, a social objective, and an environmental objective.
- D.8 Where there are no relevant development plan policies or the policies for determining the application are out-of-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The New Local Plan for Merton

- D.9 The Merton Council is currently in the process of creating a New Local Plan as a sound basis for planning decisions. Once adopted, it will replace the Core Planning Strategy 2011, and Sites and Policies Plan 2014. The design related policies for the area of Raynes Park to which the site is located are consistent with those set out in the existing local plan, however limited weight would be applied to the policies in the emerging plan.

E. PLANNING ASSESSMENT

Principle of Development

- E.1 The National Planning Policy Framework; London Plan Policy GG2 (Making best use of land), D3 (Optimising site capacity through the design-led approach), and H1 (Increasing housing supply); and Local Plan Policy CS 8 (Housing Choice) all seek to increase sustainable housing provision and access to a mixture of dwelling types for the local community, if proposals are well-designed and provide an acceptable standard of accommodation.
- E.2 London Plan Policy H2 (Small sites) states that boroughs should pro-actively support well-designed new homes on Small sites, so as to recognize that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on Small sites.
- E.3 London Plan Policy H10 (Housing size mix) states that schemes should generally consist of a range of unit sizes, particularly with regards to use mix, optimisation of on-site housing potential, and the need for additional family housing balanced with the role of one- and two-bed units in freeing up existing family housing.
- E.4 Local Plan Policy CS 9 (Housing Provision) states that the Council should work with housing providers to facilitate the provision of an indicative range of 500-600 homes in Raynes Park for the period of 2011-2026.
- E.5 Local Plan Policy CS 14 (Design) states that schemes involving dwelling conversions that result in the loss of an existing family-sized unit must incorporate the re-provision of at least one family-sized unit - a family-sized unit has at least 3 bedrooms.
- E.6 The Policy Map of Raynes Park from SPP 2014 shows that no site-specific policy would apply. However, it should be noted that the site is located adjacent to a large area for allotments currently designated as Metropolitan Open Land (MOL), Open Space, and within the Bathgate Road Conservation Area.

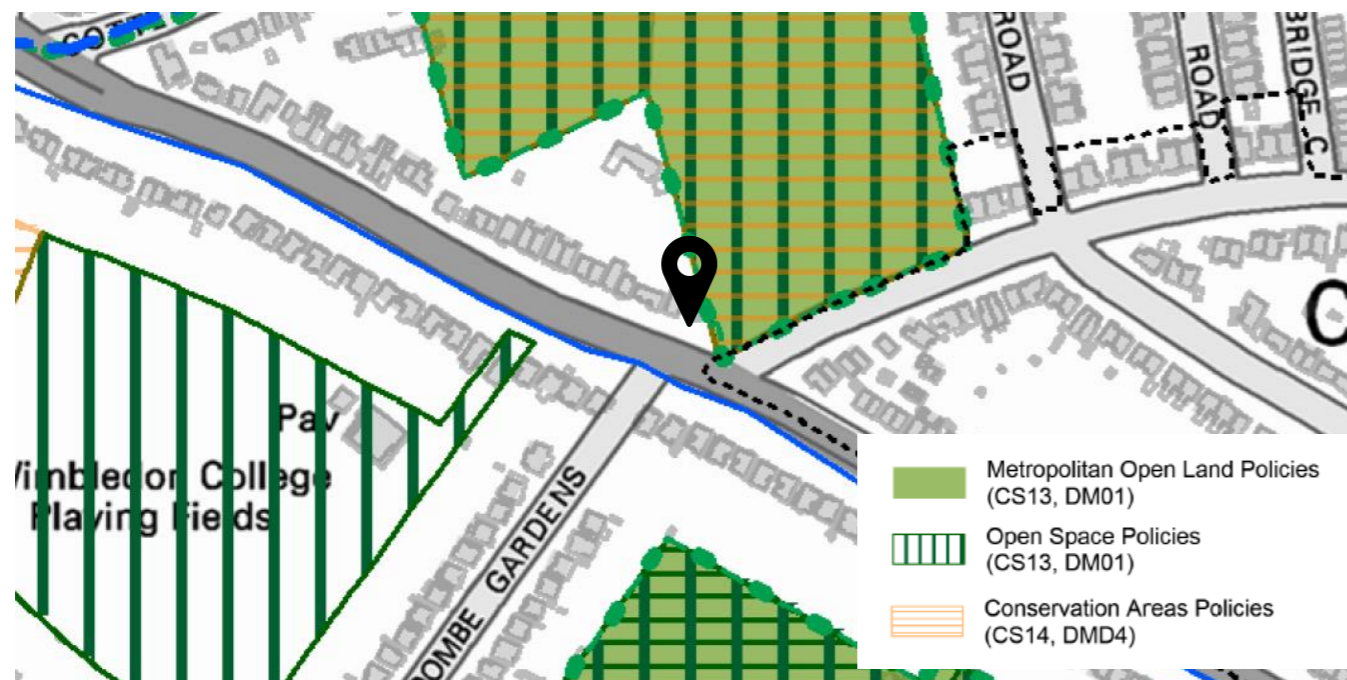


Figure 5 – Policy Map for C1 area of Raynes Park; site pinned in black (source: Merton SPP 2014)

- E.7 Local SPP Policy DM H2 (Housing Mix) states that residential development proposals will be considered favourably where they contribute to meeting the needs of different households by providing a mix of dwelling sizes, taking account of the borough level indicative proportions concerning housing mix.
- E.8 Pre-Application advice was sought for the demolition of the existing bungalow, and erection of a two-storey dwelling with six (6) self-contained units (ref:23/P1125). It was stated there that the existing dwelling is unremarkable and of limited architectural value, despite it being located adjacent to a designated MOL, Open Space, and Conservation Area. Therefore, it further states, that the demolition of the existing dwelling can be acceptable in principle, subject to the replacement building being of suitable design and scale which would preserve or enhance the setting of the Conservation Area, and not cause a harmful impact on the openness of the MOL.
- E.9 This planning application follows the same Principle of Development as what was submitted when Pre-Application Advice was sought. Therefore, the proposed development here should also be deemed acceptable in terms of Principle of Development. Proof of the replacement building being of suitable design and scale which would preserve or enhance the setting of the Conservation Area, and not cause a harmful impact on the openness of the MOL will be provided in the subsequent sub-chapter of this document, Design and impact upon the Character and Appearance of the Area.
- E.10 The proposed replacement building seeks to provide additional residential dwelling units, in the form of six (6) self-contained flats, to address Raynes Park's housing need by increasing on-site density, and the erection of a multi-storey residential building comprising six (6) self-contained flats with varying accommodation typologies that replaces the existing bungalow. The principle of doing so is in line with policies seeking to increase provision of additional homes, while diversifying the housing mix offering through intensification opportunities on Small sites.
- E.11 The proposed replacement building also includes a three-bedroom, family-sized unit at the lowest floor, thereby complying with Local Plan Policy CS 14.

Merton's five year land supply

- E.12 Merton currently does not have a five-year supply of deliverable housing. It is therefore advised that members should consider this position as a significant material consideration in the determination of planning applications proposing additional homes.
- E.13 Where local planning authorities cannot demonstrate a five-year supply of deliverable housing sites, relevant decisions should apply the presumption in favour of sustainable development. This means that for planning applications involving the provision of housing, it should be granted permission unless:
- the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse effect of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
- E.14 In real terms, if Merton continues to not meet its housing supply, then greater weight will need to be given to delivering more housing in the planning balance. Therefore, it is important that the Council seeks to deliver new housing now and make the most efficient use of sites to deliver new homes with appropriately designed buildings. The proposed development's additional accommodation on the site will make a valuable contribution towards Merton meeting its housing targets.

Design and Impact upon the Character and Appearance of the Area

- E.15 The National Planning Policy Framework; London Plan Policies D3 (Optimising site capacity through the design-led approach) and D4 (Delivering good design); Local Plan Policy CS 14 (Design); and Local SPP Policies DM D1 (Urban design and public realm), DM D2 (Design considerations in all developments) and DM D3 (Alterations and extensions to existing buildings) require well-designed proposals which make a positive contribution to the public realm, are of the highest quality materials and design, and which are appropriate in their context. Thus, development proposals must respect the appearance, materials, scale, bulk, proportions, and character of their surroundings.
- E.16 Local Plan Policy CS 4 (Raynes Park Sub-Area) identifies the site as Residential on its Sub-Area Plan. It further states that the surrounding area of Raynes Park Local Centre will require developments to respect local character and amenity in surrounding residential neighbourhoods.

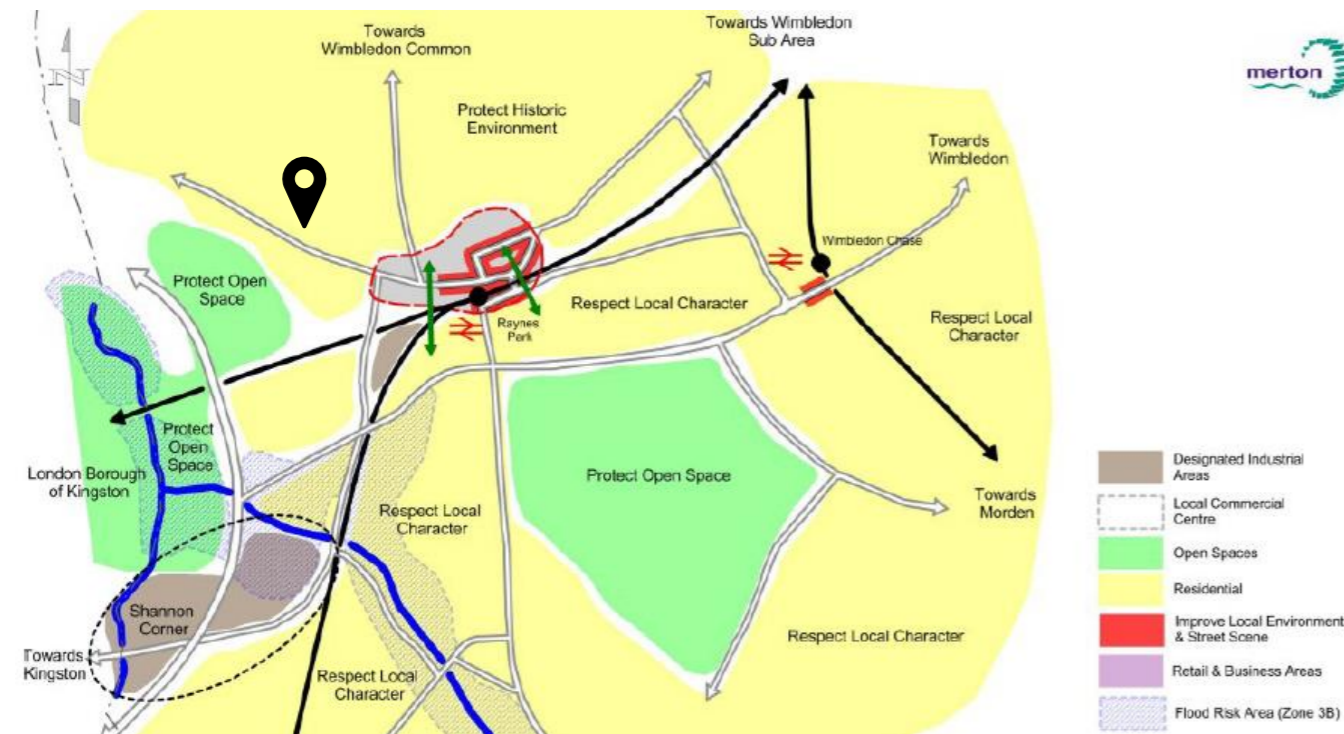


Figure 6 – Raynes Park Sub-Area Plan; site pinned in black (source: Merton Core Planning Strategy 2011)

- E.17 London Plan Policies G1 (Green infrastructure), G3 (Metropolitan Open Land), and G4 (Open Space); Local Plan Policy CS 13 (Open space, nature conservation, leisure and culture); and Local SPP Policy DM O1 (Open Space) all seek to protect the borough’s open space network, and that any proposed development will only be acceptable if the visual amenities of the MOL or designated Open Space will not be harmed by reason of siting, materials, and design.
- E.18 London Plan Policy HC1 (Heritage conservation and growth), Local Plan Policy CS 14 (Design), and Local SPP Policy DM D4 (Managing heritage assets) all seek to conserve the borough’s heritage assets and wider historic environment, and that any proposed development shall conserve and where appropriate enhance the significance of the asset and its setting.
- E.19 The site lies adjacent to a large area for allotments currently designated as Metropolitan Open Land (MOL), Open Space, and within the Bathgate Road Conservation Area. The Pre-Application Advice (ref: 23/P1125) states that the location’s value is rooted in the openness of the designated MOL, and the design and scale of the surrounding buildings that preserve or enhance the Conservation Area’s setting.

- E.20 The houses along Coombe Lane are generally detached or semi-detached properties of various architectural styles and treatment. Most properties have pitched clay tiled roofs, and a significant number of properties have had single- to double-storey rear extensions and roof dormer additions to both the front and rear roof slopes. Many of these roof dormers are large enough to occupy the dwelling’s full width. Most of these rises in line with the elevation at the rear of the houses and give the appearance of a 3-storey building. As such, the original roof line has been lost and when viewed from the rear, across the MOL, the building edge appears as 3-storey developments in built form. Such aspect of the existing properties along Coombe Lane would give rise to an opportunity for a new development that rises three (3) storeys at most above the ground.



Figure 6 – Aerial view of existing properties along Coombe Lane showing multiple ground floor rear extensions and roof dormer additions to the rear roof slopes that give the overall appearance of three-storey developments when viewed from the MOL to its rear; site pinned in white (source: Google Maps; accessed January 2024)

- E.21 The proposed replacement building, a 2-storey residential dwelling with accommodations at the basement and roof space levels, would be larger in terms of width, height, and depth than the existing detached bungalow. However, its overall scale, form, massing, and appearance would still be in keeping with the character of the existing properties along Coombe Lane.

E.22 In terms of building depth and siting, the proposed development would generally follow the established building lines in the area. The proposed front elevation would be set back from the road that is consistent with the rest of the Coombe Lane properties. The proposed rear elevation would align well with the other properties as a significant number of which have already had single- to double-storey rear extensions. In terms of building width, the proposed development would not be so different from its immediate neighbour, 262 Coombe Lane and the rest of the properties when viewed as pairs of semi-detached structures.

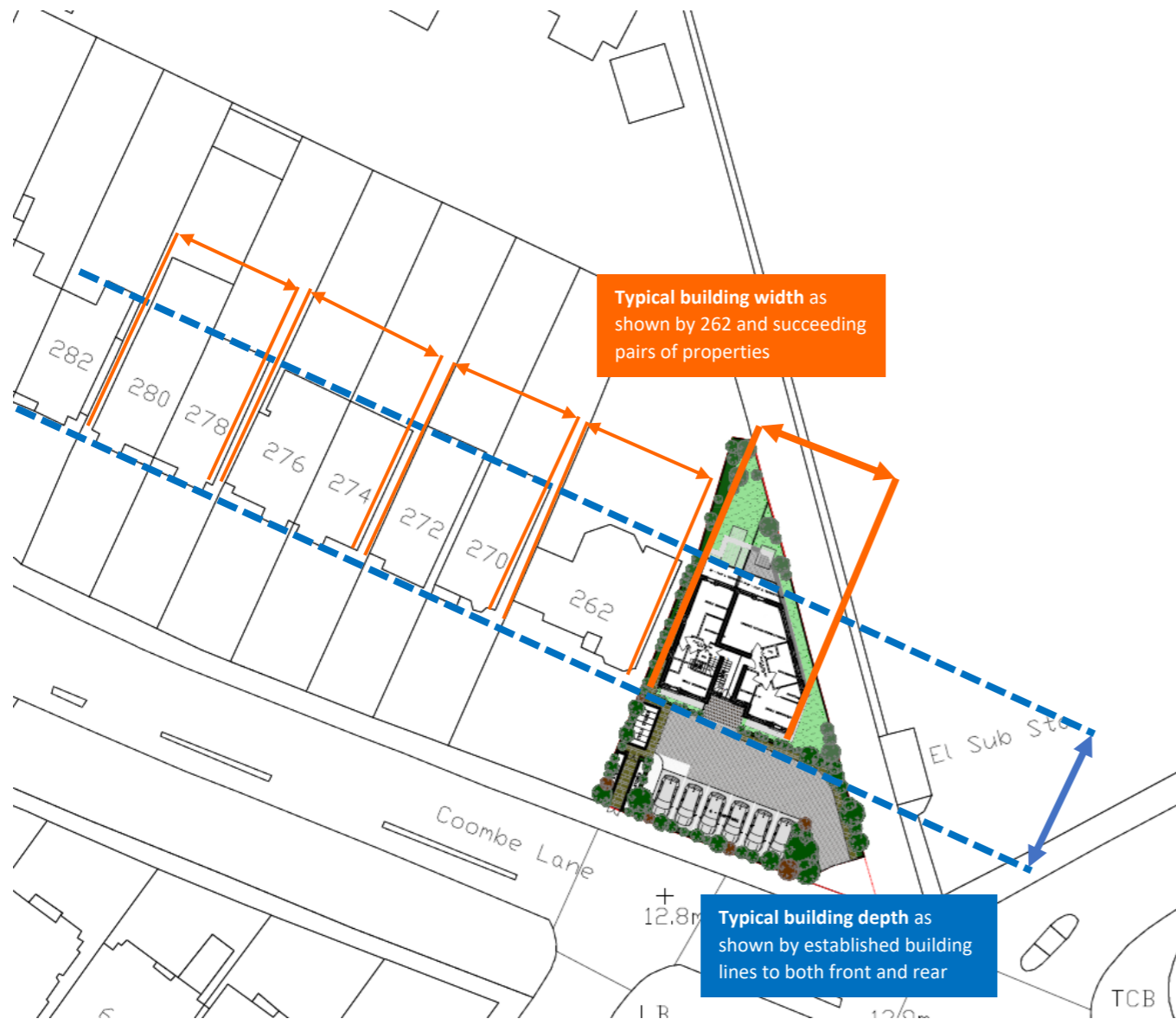


Figure 7 – Proposed Block Plan of 260 Coombe Lane showing its similarity with neighbouring properties, in terms of building width and depth

E.23 In terms of building height and overall form, the proposed development would rise only two (2) storeys at most above ground, with additional accommodations at the basement and roof space levels, while adopting a traditional pitched roof form with gable ends and roof dormers. Such height and roof form would be consistent with the rest of the Coombe Lane properties.



Figure 8 – Street-level visualization of the proposed two-storey residential dwelling with accommodations at basement and roof space levels at 260 Coombe Lane showing its overall height and roof form

E.24 The street scene elevation along Coombe Lane below would show how the proposed development aligns well with the rest of the Coombe Lane properties in terms of overall roof, eaves, and floor levels. The proposed development would not be drastically different from the existing properties in the area but would in fact follow the established building lines along its facades. Further details are included in the Design and Access Statement that accompanies this planning application.



Figure 9 – Street scene elevation along Coombe Lane showing how proposed development at 260 Coombe Lane (rightmost) aligns with other properties (from leftmost to middle: 272,270,262) in terms of overall roof, eaves, and floor levels

E.25 In terms of materials, textures, and colors, the proposed development would utilize red stock facing brick and white / light taupe render with charcoal grey accents for the walls, and orange/brown clay tiles for the roof. All of which have been observed to be the typical building materials used for the existing properties along Coombe Lane.



Figure 10 – Material Elevation of proposed development at 260 Coombe Lane showing schedule of building materials, of which are typically used for the neighbouring properties along Coombe Lane

E.26 While the overall design approach would be contemporary, key urban design elements and traditional architectural features of the existing properties along Coombe Lane have been adopted for the proposed development: building siting that follows established building lines for depth and width; building height with respect to roof, eaves, and floor levels; roof form and use of dormers; and choice of materials and colors. This results in a proposed building whose scale, form, massing, and appearance would be in keeping with the established character of the area, and in full compliance with the aforementioned planning policies and material considerations.

E.27 Moreover, the proposed development would retain the existing trees and shrubbery within the property, and supplement those with more trees, shrubs, low hedging, and grass lawns as per the Landscape Plan and Details that accompanies this planning application. Such would reinforce the character of openness of the adjacent MOL and Open Space, especially when one is reminded that the edge between the aforementioned MOL and Open Space, and the access road to the site's rear is already extensively lined with lush and mature trees.

E.28 With all of these, the proposed development should not cause any detrimental impact to the MOL, Open Space, and Conservation Area that the site lies adjacent to. The openness of the designated MOL and

Open Space, and the setting of the Conservation Area would at least be preserved, if not even enhanced, by the proposed development.

Impact upon Neighbouring Amenity

E.29 Local SPP Policy DM D2 (Design considerations in all developments) states that proposals must be designed to ensure that they would not have an undue negative impact upon the amenity of neighbouring properties, in terms of loss of light, quality of living conditions, privacy, visual intrusion, and noise.

E.30 The proposed development is well sited at the middle of the property and would have a separation distance of 2.7 m from the property at 262 Coombe Lane, 14.0 m from the furthest end of the property's boundary to the rear, and 5.9 m from the adjacent allotments to the right when the width of tarmacked access road is considered. Furthermore, the Fencing Plan and Details that accompanies this planning application would demonstrate that the existing timber boundary fences surrounding the property would all be retained, and/or restored as necessary, as part of the boundary treatment. The Landscape Plan and Details would also show that the existing trees and shrubbery within the property would be retained, and would be supplemented with more trees, shrubs, low hedging, and grass lawns. Overall, the separation distances and physical buffers afforded by the fences and soft landscaping should significantly limit, if not completely eliminate, the negative impact the proposed development would have upon the amenity of neighbouring properties, in terms of quality of living conditions, privacy, visual intrusion and noise.



Figure 11 – Proposed Block Plan of 260 Coombe Lane showing how much the proposed development is setback from the boundaries shared with neighbouring properties



Figure 12 – Proposed Perimeter Fencing Plan and Details Plan of 260 Coombe Lane showing that the existing boundary treatments would be retained, and/or restored as necessary, given that these already provide sufficient levels of privacy for the present and future occupants at 260 Coombe Lane

E.31 The Pre-Application Advice (ref: 23/P1125) stated that the proposed erection of a dwelling with six (6) flats as replacement of the existing detached family dwellinghouse would not see intensification that would cause additional noise or disturbance to surrounding occupants. The proposed development in this application would still be the same in principle: an erection of a dwelling with six (6) flats as replacement of the existing detached family dwellinghouse. Therefore, this should mean that the proposed development in this planning application should also not see intensification that should cause additional noise or disturbance to surrounding occupants.

262 Coombe Lane

E.32 The proposed development at 260 Coombe Lane would have a separation distance of 2.7 m from the property at 262 Coombe Lane. Furthermore, the proposed first floor level would not extend beyond the rear building line of 262 and would steer clear of the 45-degree window splay line of 262's first floor rear window.

E.33 The Pre-Application Advice (23/P1125) recommended the reduction in size and number of rear windows at the first and second floor levels to reduce impact of overlooking to 262. The proposed development in this planning application has followed that recommendation by reducing the number of windows from six (6) to just five (5). The windows heights have also gone from full height to just door height. The window sills have gone from 400 mm to 725 mm from finish floor level. Furthermore, the total surface area of the glazing has significantly been reduced by 45%.

E.34 The Pre-Application Advice (23/P1125) recommended that the front first floor terrace be moved further away from the flank elevation to prevent overlooking to the front bay windows of 262. The proposed development in this application has followed that recommendation by setting back the Flat 4 terrace by 0.75

meters from the flank elevation. Furthermore, privacy screens that are 1.80 to 2.00 meters high shall be installed here.

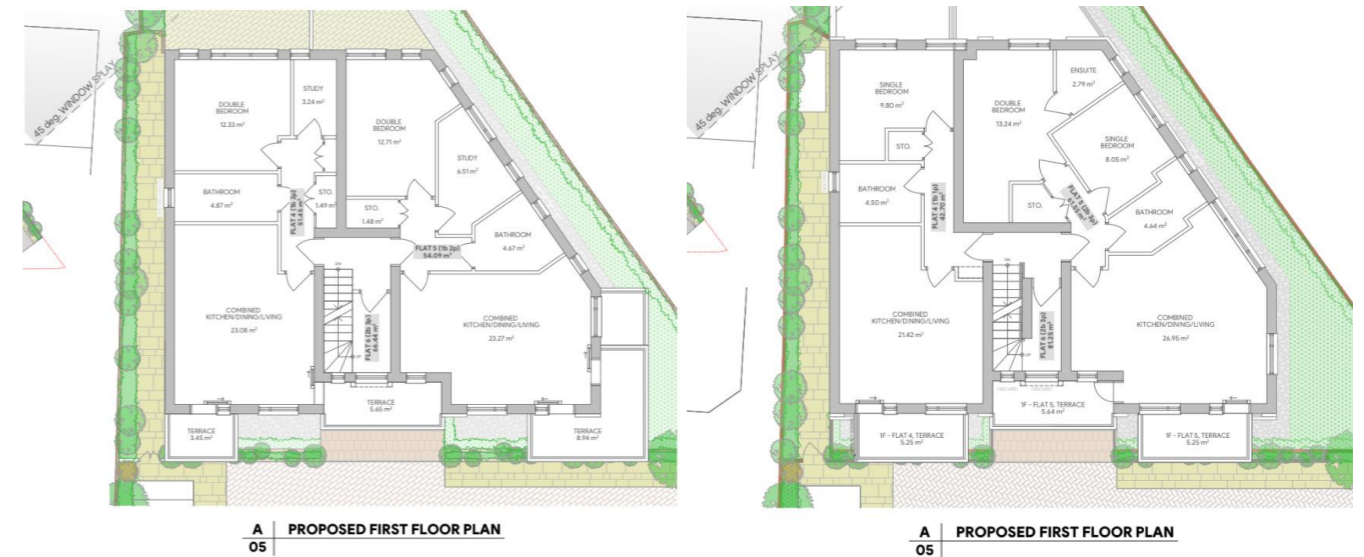


Figure 13 – Proposed First Floor Plan submitted for Pre-Application Advice (ref: 23/P1125), left, and Proposed First Floor Plan for this planning application, right, showing the reduction in size and number of windows to the rear of the first floor, and the movement of the front first floor terrace away from the flank elevation – following recommendation from the Pre-Application Advice

E.35 The Daylight and Sunlight Assessment Report that accompanies this planning application has demonstrated that only one window, Window 7 or the ground floor window at the flank of 262 Coombe Lane, will only be adversely impacted by the proposed development at 260 Coombe Lane. The Report further concludes that the design, scale and siting of the proposed development at 260 Coombe Lane would not result in a material loss of daylight and sunlight, and outlook to the occupants at 262 Coombe Lane, and should not pose a barrier to granting planning permission.

258 Coombe Lane

E.36 The proposed development at 260 Coombe Lane, both from what was submitted for Pre-Application Advice (ref: 23/P1125) and what is in this planning application, would be set back further from the rear when compared to the existing bungalow.

E.37 Also, the Pre-Application Advice (23/P1125) has stated that the proposed replacement building at 260 Coombe Lane, due to its distance, depth, and height, would not subject the neighbouring occupants at 258 Coombe Lane to any loss of daylight and sunlight, and outlook. There is no material difference, in terms of distance to 258 and the depth and height of the proposed development at 260, between what was submitted for Pre-Application Advice and what is in this planning application. Therefore, the proposed development in this planning application would also not subject the neighbouring occupants at 258 to any loss of daylight and sunlight, and outlook.

E.38 It should be noted that the Daylight and Sunlight Assessment Report that accompanies this planning application has not considered any adverse impact to the amenities at 258 Coombe Lane. It is largely implied that the siting of the development at 258 relative to the siting of the proposed development at 260 would be enough to demonstrate no material impact to the amenities at 258.

Overall Impact upon Neighbouring Amenity

- E.39 While the upper floor units would have external amenity spaces in the form of terraces, privacy screens would be placed on each unit's terrace to avoid overlooking towards the neighbouring properties and prevent any harmful impact upon their amenity. Furthermore, none of the terraces of the upper floor units would be placed on the rear and western side elevation of the proposed development – thus avoiding any potentially harmful overlooking towards any of the rear gardens in the area.
- E.40 This proposed development would overall not result in any materially harmful impact upon the amenity of the neighbouring properties to the rear or western side, in terms of loss of light, quality of living conditions, privacy, visual intrusion, and noise, and would therefore comply with Merton SPP Policy DM D2.

Standard of Accommodation

- E.41 London Plan Policy D6 (Housing quality and standards) requires housing development to be of the highest quality internally and externally and should satisfy the minimum internal space standards as set out in Table 3.1 of the London Plan. It is also noted that bedrooms of 11.5sqm and over are considered to be double bedrooms and single bedrooms must be a minimum of 7.5sqm. Local SPP Policy DM D2 (Design considerations in all developments) further states that developments should provide suitable levels of sunlight and daylight, and quality of living conditions for future occupants.
- E.42 The proposed flats, as listed in the schedule of proposed accommodation of this document, all meet and exceed the relevant standards for gross internal floor areas of the London Plan and its Plan Guidance on Housing Design Standards – as demonstrated by the table below.

Proposed Flats	Level/s	Bedrooms & Persons	Proposed Internal Floor Area (sqm)	Minimum Standard (sqm)	Proposed Private Living-Dining-Kitchen Area (sqm)	Minimum Standard (sqm)
Flat 1	Basement & Ground	3b4p	91.70	84.00	29.80	27.00
Flat 2	Ground	2b3p	62.57	61.00	25.72	25.00
Flat 3	Basement	3b4p	77.39	74.00	29.14	27.00
Flat 4	First	1b1p	42.70	39.00	21.17	21.00
Flat 5	First	2b3p	61.55	61.00	25.63	25.00
Flat 6	Roof space	2b3p	81.25	61.00	28.86	25.00

Table 2 – Proposed Accommodation Schedule at 260 Coombe Lane, and its compliance with minimum requirements in the London Plan 2021

- E.43 All the proposed flats would be dual aspect. All bedrooms and combined kitchen-living-dining spaces of each proposed flat would have good outlook, and access to natural light and ventilation via window provisions, some of which are of full height. The layout is arranged in a way for all proposed flats to have direct access to the common point of entrance and circulation space, without impeding the access of occupiers of other flats within the proposed development.
- E.44 Regarding private external amenity spaces, the London Plan Guidance on Housing Design Standards and Local SPP Policy DM D2 (Design considerations in all developments) require provision of a minimum of 5 sqm of private outside space for 1-2 person dwellings, with a minimum depth and width of 1.5 m, and an extra 1 sqm provided for each additional occupant.
- E.45 Flat 1, a duplex unit at the basement and ground floor levels, would have access to a rear garden and a ground floor terrace. Flat 3 would have direct access to its own rear gardens. The other units would have

private external amenity spaces in the form of a terrace or two. All proposed flats would meet and exceed the minimum area and dimension requirement of the abovementioned policies on private external amenity spaces as shown in the table below.

Proposed Flats	Level/s	Bedrooms & Persons	Proposed Private External Amenity Space (sqm)		Minimum Standard (sqm)
			Space Type	Total Area	
Flat 1	Basement & Ground	3b4p	garden & terrace	50.54 (44.28+6.26)	7.00
Flat 2	Ground	2b3p	terrace	7.19	6.00
Flat 3	Basement	3b4p	garden	62.03	7.00
Flat 4	First	1b1p	terrace	5.25	5.00
Flat 5	First	2b3p	terraces	10.89 (5.64+5.25)	6.00
Flat 6	Roof space	2b3p	terraces	8.40 (4.20+4.20)	6.00

Table 3 – Proposed private external amenity spaces for all flat accommodations at 260 Coombe Lane, and its compliance with minimum requirements in the Local SPP Policy 2014

- E.46 While the minimum requirements for private external amenity spaces for each of the six (6) flats have been met and exceeded, nearby open spaces that can complement these amenity spaces include:

- Cottenham Park Recreation Ground, Melbury Gardens, West Wimbledon (0.42 km away)
- Raynes Park Sports Ground, Taunton Avenue, Raynes Park (0.51 km away)
- Holland Gardens Open Space, Cambridge Road, West Wimbledon (0.83 km away)

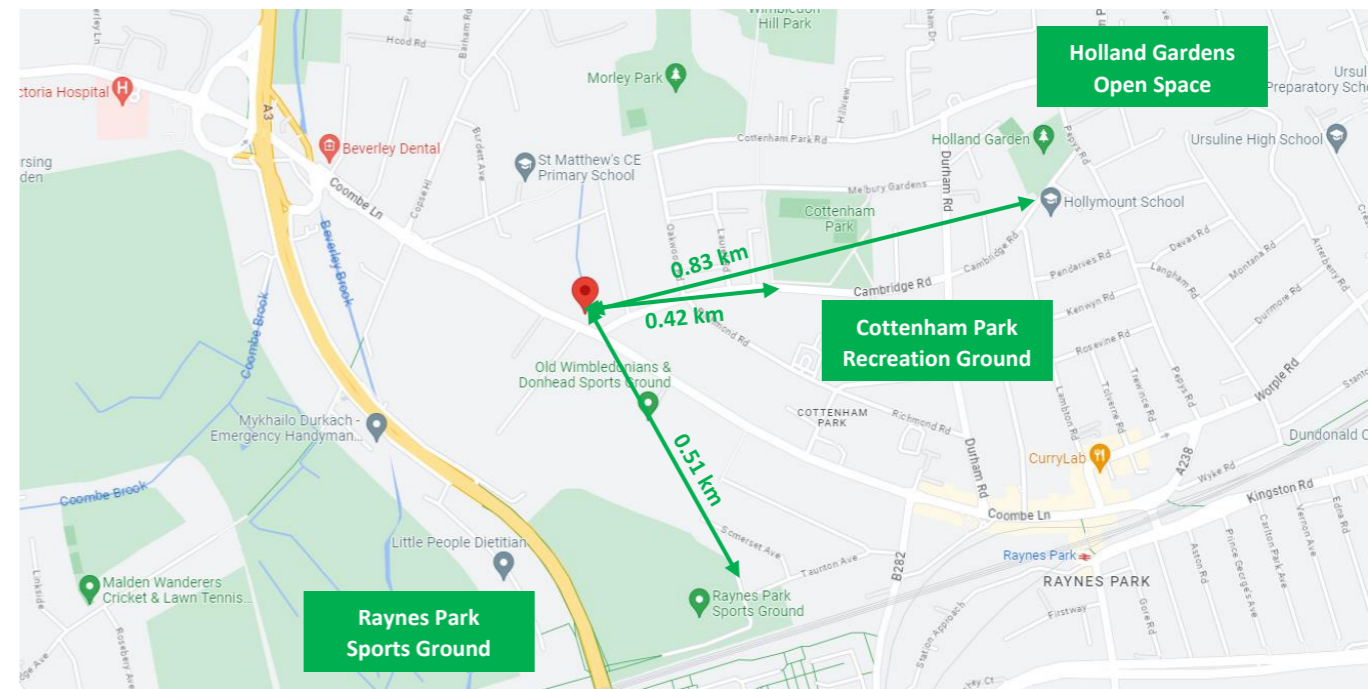


Figure 14 – Local parks less than 1 km away from 260 Coombe Lane (source: Google Maps; accessed November 2023)

- E.47 All the proposed flats would be of excellent quality, providing room sizes that meet and exceed the requirements of the London Plan and its Plan Guidance on Housing Design Standards, and Merton's SPP. All the proposed flats would be dual aspect, and would receive sufficient levels of outlook, and daylight and

sunlight. All the proposed flats would have private external amenity spaces that are of sufficient size and dimension.

- E.48 The proposed development would provide a high-quality form of residential accommodation that offers a satisfactory standard of living for the future occupants of all the proposed units.

Transport, Parking, and Cycling Storage

- E.49 London Plan Policy T6 (Car Parking) states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, and for surface-level parking to be permeable.
- E.50 The site only has a Public Transport Accessibility Level (PTAL) of 1b. While the ideal scenario is for a car-free development, the proposal would have to supplement the low public transport access rating with provisions for off-street car parking, on top of its active transport contribution via on-site cycle storage provisions.
- E.51 Local Plan Policy CS 20 (Parking, Servicing and Delivery) requires that development would not adversely affect pedestrian or cycle movements, safety, the convenience of residents, street parking or traffic management. Furthermore, Local SPP Policies DM T1 (Support for sustainable transport and active travel), DM T2 (Transport impacts of development), and DM T3 (Car parking and servicing standards) all seek to ensure that developments do not result in congestion, have a minimal impact on existing transport infrastructure, and provide suitable levels of parking.
- E.52 London Plan Policy T6.1 (Residential Parking) states that the maximum residential car parking provision for sites within Outer London with a PTAL of 0-1 is 1.5 spaces per dwelling, regardless of number of beds per dwelling. It further notes that for three-bed dwellings, Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing.
- E.53 Given the proposed schedule of accommodation being 2-3b4p, 3-2b3p, and 1-1b1p flats, the total maximum car parking provision is nine (9) for the entire property.
- E.54 The site is not located within a Controlled Parking Zone (CPZ), therefore surrounding streets do not contain restrictions for on-street parking for future occupants.
- E.55 The proposed six (6) off-street car parking bays provide adequate parking for the development, one car parking bay for each of the six (6) proposed flats. The entire parking area would be of permeable paving. The number of parking bays are well under the London Plan's maximum limit, would not compromise the highway safety in the area, nor cause excessive strain on the street parking provision in the area as per above-stated policies.
- E.56 Local Plan Policy CS 18 (Active Transport) seeks to promote active transport by requiring new development to provide cycle parking, and encouraging design that provides, attractive, safe, covered cycle storage, cycle parking and other facilities. London Plan Policy T5 (Cycling) requires developments to provide appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Table 10.2 of the London Plan identifies minimum cycling parking standards of 1 space per studio/1-person 1-bedroom dwelling, 1.5 spaces per 2-person 1-bedroom dwelling, and 2 spaces per all other dwellings.
- E.57 The proposed schedule of accommodation would require a minimum of eleven (11) total cycle spaces.
- E.58 The proposal includes eleven (11) cycle spaces within secured and sheltered timber storages. This meets and exceeds the requirements of the London Plan and would be in accordance with planning policies on active transport.

Refuse

- E.59 London Plan Policies SI 7 (Reducing waste and supporting the circular economy) and SI 8 (Waste capacity and net waste self-sufficiency) identifies that, in order to manage London's waste sustainably, the waste management capacity of existing sites should be optimized, and developments should be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.
- E.60 Local Plan Policy CS17 (Waste Management) requires new developments to demonstrate integrated, well-designed waste storage facilities that would include recycling facilities.
- E.61 Six (6) refuse bin stores, one for each of the six (6) flats, would be located at the front of the property. All refuse bin stores are immediately accessible from Coombe Lane and are secured by a pedestrian gate. It would be in a suitable location during collection days when needing to wheel/bring forward to the kerbside.

Fire Safety

- E.62 London Plan Policy D12 (Fire Safety) requires all development proposals to achieve the highest standards of fire safety.
- E.63 Fire safety has been accounted for this proposed development. A separate Fire Statement accompanies this application, where complete details on fire safety measures are included.

Safety and Security Considerations

- E.64 Local SPP Policy DM D2 (Design considerations in all developments) sets out that all developments must provide layouts that are safe, secure, and take account of crime prevention, and are developed in accordance with Secured by Design principles.
- E.65 The proposed development would be enclosed within suitable boundary treatments and would have a direct street frontage towards Coombe Lane, with passive surveillance on to the street. Site access would be visible from Coombe Lane, as well.
- E.66 The site layout has no indication that the environment created would be or feel unsafe, therefore the proposal should be acceptable in terms of safety and security considerations.

Trees and Biodiversity

- E.67 London Plan Policies G3 (Metropolitan Open Land), G4 (Open space), G5 (Urban greening), G6 (Biodiversity and access to nature), and G7 (Trees and woodlands); Local Plan Policy CS 13 (Open Space, Nature Conservation, Leisure, and Culture), and Local SPP Policy DM O2 (Nature conservation, trees, hedges and landscape features) require development proposals to conserve and enhance biodiversity and trees.
- E.68 The Tree Survey that accompanies this planning application would demonstrate that there is only one tree on site labeled T1, a small self-set Purple Plum on the eastern boundary, which was categorized as a poor specimen with no longevity. Tree T1 has been categorized as Category C or trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm, are unremarkable trees of very limited arboricultural merit, and with no material conservation or other cultural value. Tree T1 would be removed as shown in the Landscape Plan and Details that accompanies this planning application. The Arboricultural Impact Assessment states that such tree cannot be easily viewed from the public highway, and that given its size and condition, its impact on the wider visual amenity will be negligible.

E.69 The Tree Survey would also show that a tree at 262 Coombe Lane should be considered - T2, a mature Oak tree that has been heavily reduced in the past and as a result has lost its natural form. Tree T2 is listed under a Tree Preservation Order MER 774 but is also categorized under Category C with questionable longevity. The Arboricultural Impact Assessment and Tree Protection Plan that accompanies this planning application would demonstrate that only a protective fence in place during demolition and main construction is needed. Such fence can only be removed at stage of pedestrian entrance installation. No other concerns were raised regarding Tree T2 in relation to the proposed development at 260 Coombe Lane.

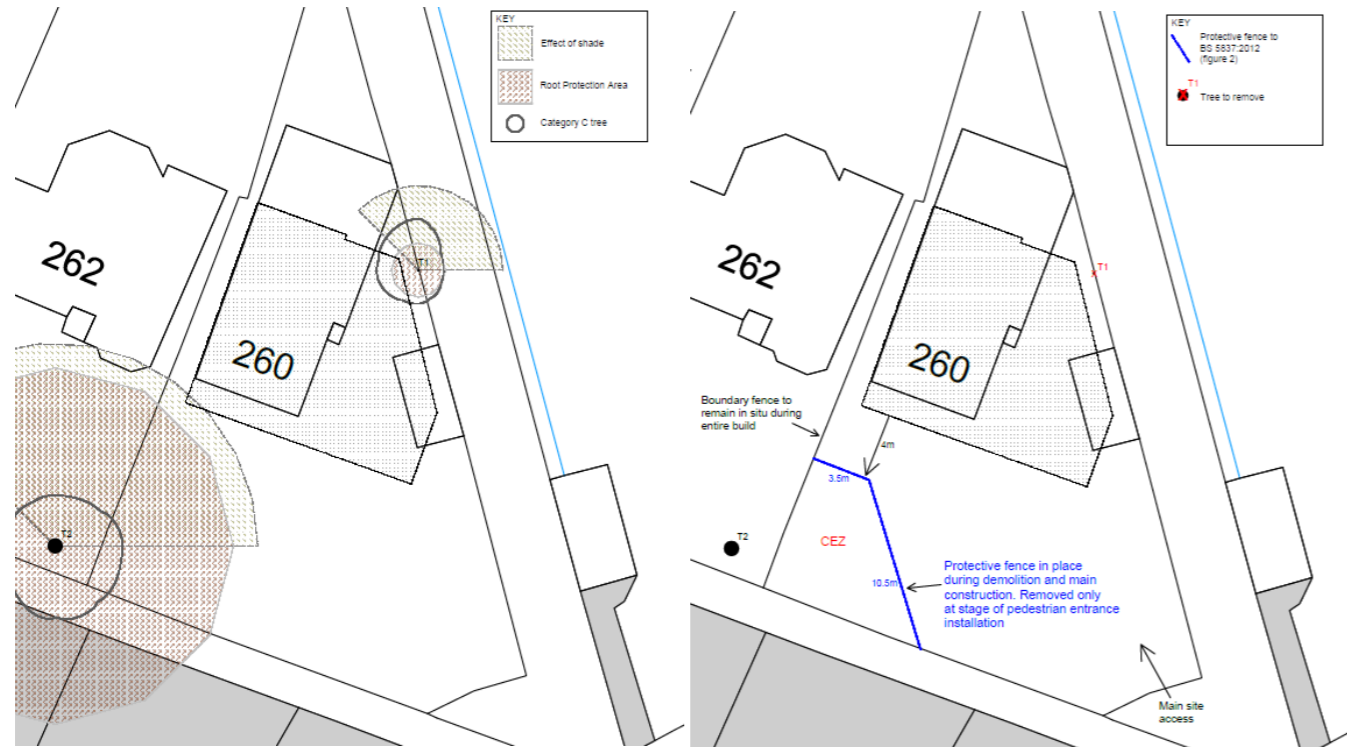


Figure 15 – Tree Constraints Plan, left, and Tree Protection Plan, right, showing a Purple Plum Tree of Category C located on site for removal, and an Oak Tree of Category C located on the neighbouring property to be protected during construction

- E.70 Overall, the Arboricultural Impact Assessment and Tree Survey, including the Tree Constraints Plan, Arboricultural Method Statement (AMS), and Tree Protection Plan (TPP) that accompanies this planning application, would demonstrate that if the recommendations listed in the AMS and shown on the TPP are adhered to, there should be no reason why the proposed development at 260 Coombe Lane should not be able to proceed without undue pressure on the existing tree cover.
- E.71 The Landscape Plan and Details that accompanies this planning application would demonstrate that the existing shrubs and plants in the front garden would be retained. Supplementary planting in the front and rear garden, in the form of shrubs/low hedging, and small, narrow trees, would be placed as necessary. These shall be sited on extensive grass lawns within the property, and adjacent to permeable pavers for both the driveways and pedestrian pathwalks. A Green Roof is also included in the proposed development. These should improve air quality and the appearance of the overall landscape in the area – all of which positively contributing to the “green” character of the site being next to a designated Metropolitan Open Land and Open Space, and to the well-being of the residents in the vicinity.



Figure 16 – Landscape Plan of the proposed development at 260 Coombe Lane showing the existing shrub and plants at the front garden to be retained; the supplementary shrubs/low hedging, and small, narrow trees for both the front and rear gardens; the extensive grass lawns on which these planting shall be placed; permeable pavers for the driveways and pedestrian pathwalks; and the extensive Green Roof

Flood Risk and Drainage

- E.72 London Plan Policies SI 12 (Flood risk management) and SI 13 (Sustainable drainage), Local Plan Policy CS16 (Flood Risk Management), and Local SPP Policies DM F1 (Support for flood risk management) and DM F2 (Sustainable urban Drainage Systems ‘SuDS’; and Wastewater and Water Infrastructure) seek to minimise the impact of flooding on residents and the environment and promote the use of sustainable drainage systems to reduce the overall amount of rainfall being discharged into the drainage system and reduce the borough’s susceptibility to surface water flooding.
- E.73 The Flood Risk Assessment that accompanies this planning application would demonstrate that there is very low risk from Fluvial flooding over time as 260 Coombe Lane is located within Flood Zone 1. The risk from Pluvial and Groundwater flooding is low to medium over time, with the main area of concern in the northeast of the site. The same document has demonstrated that the proposed development at 260 Coombe Lane can be designed to mitigate the limited risks identified with residual effects on adjacent areas considered to be negligible.
- E.74 It should also be noted that there would be a net reduction in impermeable surface area when comparing between the proposed development and existing condition at 260 Coombe Lane. The proposed development includes rear gardens with composite wood decking at the basement level, permeable paving for both driveways and pathwalks, river rocks for bordering pathways, bonded gravel for off-street car parking bays, and extensive ground-covering grassland towards the side and front of the property.
- E.75 The Sustainable Drainage Strategy (SuDS) that accompanies this planning application would demonstrate that there are proposed SuDS features at 260 Coombe Lane: a green roof to attenuate runoff from the new building and permeable paving to attenuate runoff across external areas. Both features would provide

storage and attenuation of surface water flows over the site footprint prior to discharge to the adjacent water course or surface water sewer. Such would contribute to a reduction in risk from pluvial and groundwater flooding on and around the site.

Sustainability

- E.76 London Plan Policies SI 2 (Minimizing greenhouse gas emissions), SI 3 (Energy infrastructure), SI 4 (Managing heat risk); and Local Plan Policy CS 15 (Climate change) states that all new developments comprising the creation of new dwellings should demonstrate how the proposed development complies with said policies.
- E.77 Local Plan Policy CS 15 further states that minor residential developments are required to achieve a 19% improvement on Part L of the Building Regulations 2013 and water consumption should not exceed 105 litres/person/day.
- E.78 The Energy Conservation and Efficiency Report that accompanies this planning application would demonstrate that the total CO₂ emission reduction is 75.70% from the baseline value calculated in accordance to building regulation standards. Therefore, the proposed development at 260 Coombe Lane complies with energy conservation and efficiency relevant to the above-stated planning policies.
- E.79 The Water Efficiency Report that accompanies this planning application would demonstrate that all of the six (6) proposed flats comply with Building Regulation 36 (1) as demonstrated by the tables and calculations indicated in Approved Document Part G Appendix A – Water Efficiency Calculator for New Dwelling.

Basement Accommodation

- E.80 London Plan Policy D10 (Basement development) states that smaller-scale basement excavations, where they are appropriately designed and constructed, can contribute to the efficient use of land, and provide extra living space. Local SPP Policy DM D2 (Design considerations in all developments), as supported by the Merton Basement and Subterranean SPD, states that basement developments shall meet all of the following criteria:
- *Be wholly confined within the curtilage of the application property and be designed to maintain and safeguard the structural stability of the application building and nearby buildings;*
 - *Not harm heritage assets;*
 - *Not involve excavation under a listed building or any garden of a listed building or any nearby excavation that could affect the integrity of the listed building, except on sites where the basement would be substantially separate from the listed building and would not involve modification to the foundation of the listed building such as may result in any destabilisation of the listed structure;*
 - *Not exceed 50% of either the front, rear or side garden of the property and result in the unaffected garden being a usable single area;*
 - *Include a sustainable urban drainage scheme, including 1.0 metre of permeable soil depth above any part of the basement beneath a garden;*
 - *Not cause loss, damage or long term threat to trees of townscape or amenity value;*
 - *Accord with the recommendations of BS 5837:2012 'Trees in relation to design, demolition and construction recommendations';*
 - *Ensure that any externally visible elements such as light wells, roof lights and fire escapes are sensitively designed and sited to avoid any harmful visual impact on neighbour or visual amenity;*
 - *Make the fullest contribution to mitigating the impact of climate change by meeting the carbon reduction requirements of the London Plan.*
- E.81 In terms of planning and design, the proposed basement accommodation at 260 Coombe Lane would be wholly confined within the application property's curtilage.

- E.82 The existing property is not a Listed Building, nor is it close proximity to any. The site is also not located within any Conservation Area. The adjacent allotments, just across the tarmacked access road to the right, is within the Bathgate Conservation Area. In spite of this, it has been earlier demonstrated in this document that the overall scale, form, massing, and appearance of the proposed development at 260 Coombe Lane, including the proposed basement accommodation, would still be in keeping with the character of the existing properties along Coombe Lane, and would not have any material detrimental impact to the adjacent Conservation Area. Therefore, there should be no harm to any heritage assets or Listed Building.
- E.83 The Sustainable Drainage System (SuDS) Report and Flood Risk Assessment that accompanies this planning application would have earlier demonstrated that the proposed development includes a sustainable urban drainage scheme.
- E.84 The Arboricultural Impact Assessment and Tree Survey that accompanies this planning application would have earlier demonstrated that the proposed development would not cause loss, damage, or long-term threat to trees of townscape or amenity value.
- E.85 The Energy Conservation and Efficiency Report that accompanies this planning application would have earlier demonstrated that the proposed development would make the fullest contribution to mitigating the impact of climate change by meeting the carbon reduction requirements of the London Plan.
- E.86 Lastly, the Basement Impact Assessment, as informed by an on-site Ground Investigation Report, that accompanies this planning application would demonstrate that the proposed development at 260 Coombe Lane complies with relevant planning policies concerning basement accommodation. Mitigating measures were proposed towards adverse effects of the proposed development in terms of Groundwater Flow, Land Stability, and Surface Flow and Flooding. The Assessment has also shown that the proposed development would only have limited impact towards neighbouring properties provided a suitable basement construction method would be selected.

Air Quality Neutral

- E.87 London Plan Policy SI 1 (Improving air quality) seeks to tackle poor air quality and protect health.
- E.88 A separate Air Quality Neutral Assessment accompanies this application. The key points of which are stated below.
- E.89 The entire London Borough of Merton is declared as an Air Quality Management Area (AQMA).
- E.90 The London Plan Guidance (LPG) on Air Quality Neutral (AQN) states that minor developments will likely not be required to conduct a full air quality assessment, provided that the proposal for a dwelling:
- is only between one and nine inclusive in number;
 - has a site area of less than 0.5 hectares; and
 - has floor space less than 1,000 sqm.
- E.91 The proposal is only for six (6) flats with a site area of 588.39 sqm, and a gross floor space of 454.27 sqm. All of which complies with the above requirements, thereby constituting as minor development for AQN purposes.
- E.92 The simplified procedure for Building Emissions Benchmark (BEB) in 3.1.1 and 3.1.2 of the LPG on AQN states that minor developments are assumed to meet the BEB if:
- the new heating system is a heat pump or other zero emission heat source;
 - the new heating system is a gas boiler with NO_x emissions rated at less than 40 mg/kWh; or
 - the development is connecting to an existing heat network.

- E.93 The proposed development would utilise an Air Source Heat Pump, thereby can be assumed to meet the BEB.
- E.94 The simplified procedure for Transport Emissions Benchmark (TEB) in 4.1.1, and 4.1.2 of the LPG on AQN states that minor developments with new parking are assumed to meet the TEB if the policies in T6 and T6.1 to T6.5 of the London Plan are complied with.
- E.95 The Transport, Parking, and Cycle Storage sub-chapter under the Planning Assessment chapter of this document demonstrates that the proposed six (6) off-street parking bays are in compliance with residential parking policies of the London Plan, thereby rendering the proposed development to meet the TEB.
- E.96 The LPG on AQN further states that a development must meet both the BEB and TEB in order to be Air Quality Neutral.
- E.97 This proposal, as earlier demonstrated to be a minor development, meets both the BEB and TEB, and is therefore Air Quality Neutral.

F. CONCLUSION

- F.1 Planning permission is sought for the demolition of the existing bungalow, and erection of 2-storey residential building with accommodations at the basement and roof space levels comprising six (6) self-contained flats at 260 Coombe Lane, Raynes Park, London SW20 0RW, UK.
- A.8 Pre-Application Advice (ref: 23/P1125) was initially sought for a similar proposed development. The same scheme has been submitted in this planning application, while also addressing all of the concerns raised by the case officer during Pre-Application Advice.
- F.2 This proposed demolition of the existing single dwelling and erection of a replacement building for six (6) self-contained flats should be considered to be acceptable in principle with the policy presumption to increase the density of developments and make efficient use of land, particularly in Small sites.
- F.3 This proposed development comprises the replacement of the family-sized dwelling unit with two (2) large three-bed flats with access to the rear garden amenity spaces, three two-bed flats, and a studio flat that all positively contributes to Raynes Park's housing supply needs.
- F.4 While the overall design approach would be contemporary, key urban design elements and traditional architectural features of the existing properties along Coombe Lane have been adopted for the proposed development. This results in a proposed building whose scale, form, massing, and appearance would be in keeping with the established character of the area.
- F.5 The proposed development should not cause any detrimental impact to the Metropolitan Open Land (MOL), Open Space, and Conservation Area that the site lies adjacent to. The openness of the designated MOL and Open Space, and the setting of the Conservation Area would at least be preserved, if not even enhanced, by the proposed development.
- F.6 This proposed development would overall not result in any materially harmful impact upon the amenity of the neighbouring properties to the rear or western side, in terms of loss of light, quality of living conditions, privacy, visual intrusion, and noise.
- F.7 The proposed development would provide a high-quality form of residential accommodation that offers a satisfactory standard of living for the future occupants of all the proposed units. The proposed units would meet and even exceed the minimum space standards, be at least dual aspect, and would have sufficient access to daylight and sunlight, and natural ventilation. The flats at the lowest floor would have private external amenity spaces with sufficient area, whilst the upper floor units would have terraces with sufficient area as well.
- F.8 Sufficient car parking would be provided off-street for all six (6) flats, without exceeding maximum limits of the London Plan. Sufficient cycle space provisions in secured and sheltered storages would also be provided for all six (6) flats, while meeting the minimum requirement of the London Plan.
- F.9 Refuse bin stores of sufficient amount would be securely placed to the front of the property for ease of access of all future occupants and is accessible from the kerbside during collection days.
- F.10 The proposed development would conserve and enhance the existing trees and biodiversity, as demonstrated by the Landscape Plan and Details, and Arboricultural Impact Assessment Report and Tree Survey.
- F.11 The proposed development would result to a net reduction in impermeable surface area and include Sustainable Drainage Strategy features to store and attenuate surface water flows prior to discharge, as demonstrated by the Flood Risk Assessment and Sustainable Drainage Strategy.
- F.12 The proposed development would utilise energy and water resources efficiently as per pertinent planning policies, as demonstrated by the Energy and Water Efficiency Report.
- F.13 The proposed basement is in full compliance with all pertinent planning policies, as demonstrated by the Basement Impact Assessment and informed by an on-site Ground Investigation Report.
- F.14 The proposal, as a minor development, meets both Building Emissions Benchmark and Transport Emissions Benchmark and is therefore Air Quality Neutral, as demonstrated by the Air Quality Neutral Assessment.
- F.15 The proposed development is considered to be wholly in accordance with statutory development plans and other material planning considerations.
- F.16 The Council is respectfully requested, in accordance with the NPPF, to approve this proposal.