
PLANNING STATEMENT

3 New Close
Merton
London
SW19 2SX

“Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”
(NPPF, 2019, Paragraph 123.C)

CONTENTS

- 1.0 INTRODUCTION
- 2.0 SITE CONTEXT
- 3.0 PROPOSALS
- 4.0 PLANNING HISTORY
- 5.0 PLANNING POLICY
- 6.0 ASSESSMENT OF PROPOSALS
- 7.0 SUMMARY

September 2022

1.0 INTRODUCTION

- 1.1 This Statement supports a full planning application for a part single storey/part two storey rear extension, two-storey side extension, plus accommodation at roof level, and conversion of house into 5 x self-contained units (2 x 3-bed/4-person flats, 2 x 2-bed/3-person flat and 1 x 1-bed/1-person flats,) with associated refuse and cycle storage and 4 off-street parking spaces at No.3 New Close, which from here on is referred to as 'the application site'.
- 1.2.1 The new dwellings will provide a mix of accommodation built to a high standard and will make the best use of this truly sustainable opportunities.
- 1.3 The proposed development promotes many planning benefits including the creation of an additional four residential units which will be a meaningful contribution towards Merton's housing targets. **The recently adopted London Plan, March 2021, (Pg. 168) states that Merton must provide 2610 new homes before 2028 on sites below 0.25 hectares**, of which this proposal complies with. A mix of unit sizes are provided all with access to outside amenity space.
- 1.4 On the **14th January 2022** the Government updated their Housing Delivery Results. Between 2018 and 2021 Merton were required to deliver 1549 new homes but only delivered 1239 new homes, only 80% of the required amount.
- 1.5 The design of the proposed development has been informed by a thorough assessment of the character and composition of the surrounding area and makes best use of the site whilst also responding to the established context and constraints of the site. Developing the site in the manner proposed will maximise the potential of the site whilst also taking the opportunity to replace older housing which needs modernisation, which will enhance the wider character and appearance of the area.
- 1.6 The planning application submission comprises the following documents: -
- Existing plan, elevation and section drawings by Revive Renovations LTD
 - Proposed plan, elevation and section drawings by Revive Renovations LTD
 - Proposed 3D Renders by Revive Renovations LTD
 - Site Photographs
 - Energy and Sustainability Report by Revive Renovations LTD
 - Fire Strategy by Revive Renovations LTD
 - Supporting Planning Statement and Design and Access Statement by Revive Renovations LTD
 - CIL form
- 1.7 This Statement draws upon all submitted supporting reports to demonstrate that the proposed development is highly sustainable and fully in accordance with national and local planning policy. The proposed development presents a highly sustainable development on a brownfield site which will benefit the Borough and local community by adding to the supply of new homes and offering a mixture of unit types required in the local area.

2.0 SITE & CONTEXT



Plate 1. Front elevation



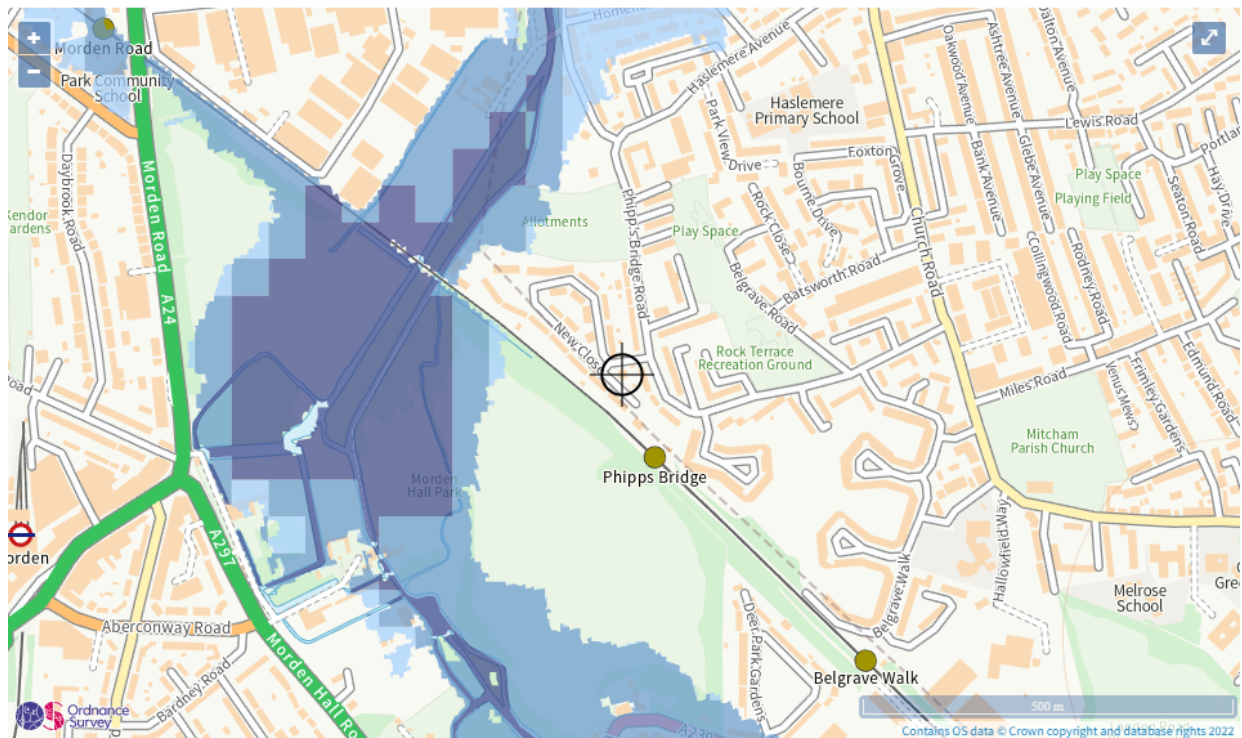
Plate 2. Front & side elevations



Plate 3. Rear elevation

2.1 The Application Site

- 2.1.1 The application site currently comprises a square site on which stands a 2-storey semi-detached property, dating from the 1950s (Plates 1 – 3). The site is bounded by New Close on two sides and is attached to a two-storey property on the eastern boundary. The property is sited on the southern end of the plot. The property is built of block and white render. The roof is pitched and clad in concrete tiles. The property is unremarkable and of limited architectural merit.
- 2.1.2 The properties to the west of the house, fronting New Close, are built block and are rendered. The properties are aligned in terraces of 6 houses.
- 2.1.3 The application site covers a total net area of 378 sq/m. The site is bounded by low timber fences.
- 2.1.4 There are no trees on the site and there are no protected or notable habitats nor plants and no evidence of bats on the site.
- 2.1.5 The site has a good PTAL rating of 2, being sited 150 meters from the bus stops on Phipps Bridge Road and 150m from Phipps Bridge Tram Station.
- 2.1.6 The map below, shows that no part of the site is within a Flood Zone.



Extent of flooding from rivers or the sea

High Medium Low Very low Location you selected

2.2 Local Context



Above: New development near the application site

Below: Standard style of housing within New Close that will be replicated



- 2.2.1 The application site is located in a residential area characterised by properties of all scales, designs and ages. Thus, there is no strong homogeneity to protect or replicate and an opportunity to better maximise the viability of a site which is not currently reaching its development potential, in accordance with the NPPF and London Plan.

3.0 PROPOSALS

- 3.1 The proposals are for extensions to the existing property to the side, rear and roof with comprising 5 x self-contained units (2 x 3-bed/4person, 2 x 2-bed/3-person, 1 x 1-bed/1 person) with associated refuse and cycle storage. The building would be constructed of block and render. The windows and doors would be constructed of aluminium.
- 3.2 The development would be aligned to respect and better reflect the common building line along New Close and would be arranged with a single primary elevation fronting New Close.
- 3.3 The breakdown of each of the units is set out in the table below.

Flat No.	No of beds	No of persons	Storeys /floors	Proposed GIA (sq/m)	Proposed storage (sq/m)	Proposed external amenity (sq/m)
A	3	4	1	84.15	4.85	25.4 - Private
B	3	4	1	78.4	2.5	20.7-Private
C	1	1	1	42.15	1.5	90.8-Communal
D	2	3	1	63.6	2.0	90.8-Communal
E	2	3	1	63.1	2.0	90.8-Communal

- 3.4 All of the proposed room sizes, floor to ceiling heights and internal storage would accord with the London Plan and national standards. Equally, refuse and cycle storage are also proposed which would also accord with the London Plan and the Council's Development Plan.
- **Flat A** (3b,4p) - at ground floor level, would have own front door and direct access onto a 25.4 sq/m private garden. The flat would be dual aspect and would have over 4 sq/m of storage space.
 - **Flat B** (3b, 4p) - at ground floor level, would be accessed from the communal ground floor entrance and would have direct access onto a rear private garden of over 20 sq/m. The rear garden would have a 1.4m high timber fence with 0.4m trellis above. The flat would be dual aspect and would have 2.5 sq/m of storage space.
 - **Flat C** (1b, 1p) – at first floor level, would be accessed from the communal entrance and would have side access onto a 90 sq/m communal garden. The flat would be dual aspect and would have 1.5 sq/m of storage space.
 - **Flat D** (2b, 3p) – at first floor level and accessed from the communal entrance. The flat would be dual aspect and would include 2 sq/m of storage. The flat would have side access onto a 90 sq/m communal garden.
 - **Flat 5** (2b, 3p) – at first floor level and accessed from the communal entrance. The flat would be dual aspect and would include 2sqm of storage. The flat would have side access onto a 90 sq/m communal garden.

- 3.5 To summarise, all of the flats would be dual aspect, would meet or be above the London Plan minimum space standards, would have access to outdoor amenity space, bike and refuse storage which would meet or be above the London Plan standards. All flats apart from the 1-bed/1-person flat would have an off road parking space. All amenity space would be surrounded by fences and trellis to a sufficient height to provide adequate private amenity space and would prevent overlooking into neighboring properties.
- 3.6 The Sustainability Statement outlines the specifications for maximizing the environmental performance of the proposed development which would achieve Part L1A Building Regulations compliance by implementing all possible energy efficiency and energy conservation measures and incorporating renewable energy system with Air Source Heat Pumps for each flat.
- 3.7 None of the gardens would have direct overlooking of or from surrounding properties and each of the flats and windows would be sited a sufficient distance from surrounding or adjacent windows that the London Plan and Local Development Plan standards in terms of overlooking and minimum distance measurements would be met.
- 3.8 The development is proposing 4 off street parking spaces. At ground floor there would be a secure communal bike store to the rear of the property. The bike store would have 10 upright cycle parking spaces.
- 3.9 The communal refuse store would be to the front of the property in a timber enclosure and consist of 2 x 660 litre euro bins.
- 3.10 The gardens would be landscaped to provide planting and to soften both the development and the streetscape.

4.0 PLANNING HISTORY

- 4.1 21/P3844 – Roof extensions, two storey side and rear extensions to create a single-family dwelling house, Granted 14/08/2022

5.0 PLANNING POLICY

- 5.1 The national and local planning policy context for the application is set out below.
- 5.2 NPPF (2019)
- Section 5 Delivering a sufficient supply of homes
 - Section 9 Promoting sustainable transport
 - Section 10 Meeting the challenge of climate change, flooding and coastal change
 - Section 11 Making effective use of land
 - Section 12 Achieving well-designed places
- 5.3 London Plan (2021)
- GG4 Delivering the homes Londoners need
 - D2 Infrastructure requirements for sustainable densities
 - D3 Optimising site capacity through the design-led approach
 - D4 Delivering good design

- D6 Housing quality and standards
- D10 Basement development
- D12 Fire safety
- D14 Noise
- H1 Increasing housing supply
- H2 Small sites
- H10 Housing size mix
- SI 12 Flood risk management
- SI 13 Sustainable drainage
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction

5.4 Merton Local Development Framework Core Strategy (2011):

- CS 8 Housing choice
- CS 9 Housing provision
- CS 11 Infrastructure
- CS 14 Design
- CS 15 Climate change
- CS 16 Flood Risk Management
- CS 17 Waste management
- CS 18 Transport
- CS 20 Parking servicing and delivery

5.5 Merton Sites and Policies Plan (2014):

- DM H2 Housing mix
- DM H3 Support for affordable housingDM D1 Urban Design
- DM D2 Design considerations
- DM EP2 Reducing and mitigating noise
- DM F1 Support for flood risk management
- DM T3 Car parking and servicing standards

5.6 Supplementary planning considerations:

- DCLG Technical Housing Standards 2015
- London Plan Housing SPG 2016

6.0 ASSESSMENT OF PROPOSALS

6.1 The key planning considerations of the application are: -

- Principle of development/Density & Housing Delivery
- Scale, Massing and Design
- Quality and mix of accommodation
- Provision of amenity space

- Impact on neighbouring properties
- Transport
- Refuse
- Sustainable Design & Construction
- Flood Risk

6.2 Principle of Development/Density & Housing Delivery

6.2.1 NPPF (2019)

Section 5 Delivering a sufficient supply of homes

Section 6 Building a strong competitive economy

Section 11 Making effective use of land

Objectives (Supply of Homes)

- To significantly boost the supply of new homes (para 59).
- Small and medium sites can make an important contribution to housing delivery because they can be built out relatively quickly (para 68)

Objectives (Efficient use of land)

- Decisions should promote the effective use of land in order to meet the need for new homes (para.117).
- Use of brownfield land should be given substantial weight (para. 118).
- Development that makes efficient use of land should be supported (para. 122).
- Decisions should avoid homes being built in low densities. (para. 123).
- Applications that fail to make an efficient use of land should be refused (para.123).

6.2.2 London Plan (2021)

Policy D2 Infrastructure requirements for sustainable densities

Policy H1 Increasing housing supply

Policy H2 Small Sites

Objectives (Housing)

- Boroughs should optimise the potential for housing delivery on all sites (H1).
- Council should pro-actively support small site development to significantly increase the contribution that small sites make towards the housing delivery (H2).

- Councils should support small/medium housebuilders (H2)
- Development densities should be considered against future accessibility levels (D2).

Principle:

- 6.2.3 The bulk, mass and design of the majority of the proposed extensions have been approved in previous application **21/P3844**. This application is simply for alterations to the first-floor rear extension, a dormer roof extension to match the others approved at No.1 and No.3 and internal alterations to create 5 self-contained flats within the envelope of the approved building mass. The proposed development would create an additional 4 units that would contribute to the council's housing targets.
- 6.2.4 There are a few examples within New Close where houses have been granted permission for two storey side and rear extensions, roof extensions and subdivision of property into smaller units, these include:
- **58 New Close 20P1065 Granted 06/05/2020**
Erection of two storey side and rear extensions, roof extensions and conversion of existing single-family dwelling into 5 self-contained units (1 x 3 bed, 2 x 2 bed, 2 x 1 bed).
 - **5 New Close 19P2684 Granted 10/09/2019**
Roof Extensions, two storey side and rear extension and conversion of existing single family dwelling house into 3 self-contained units (1 x 4-bed, 2 x 1 bed).

Density & Housing Delivery:

- 6.2.5 The London Plan outlines that small site must make a substantially greater contribution to new housing supply across London, increasing the rate of housing delivery from small sites is now a strategic priority.
- 6.2.6 Policy H1 of the London Plan sets out 10-year targets for net housing completions for each local authority, the policy states that boroughs should optimise the potential for delivery on all suitable and available brownfield sites especially sites with existing or planned public transport access levels and are located within 800m distance of a station or town centre boundary.
- 6.2.7 Policy H2 of the London Plan states that boroughs should pro-actively support well designed new homes on small sites (below 0.25 hectares in size), the policy also states that Boroughs should recognise that that local character evolves over time and needs to change in appropriate locations to accommodate additional housing on small sites.
- 6.2.8 The site measures approximately 378 sq/m and is therefore classified as a small site. The application site is roughly 150m from the bus stops on Phipps Bridge Road and 150m from Phipps Bridge Tram Station and has a PTAL of 2 – on the cusp of PTAL 3.

6.3 Scale, Massing and Design

- 6.3.1 In terms of the surroundings, the application site is surrounded by traditional two storey terrace and semi-detached houses. Opposite the site at No.5 New Close the property has been extended with a two-storey side and rear extension and rear dormer roof extensions and converted into 3 flats.
- 6.3.2 The plot is wider than the adjoining plot and could accept a larger development, which better addresses the streetscape as well as maximising the development within the plot. The majority of the proposed mass, bulk and design has been approved in application 21/P3844 and this application seeks to change the roof form of the two-storey rear extension to align better with the two-storey rear extension at No.1, increase the size of the dormer that has been previously approved at No.3 and internal alterations to form 5 units and reconfiguration of the cycle/waste storage and garden formation.
- 6.3.3 London Plan policies D4 and D6, Core Strategy Policy CS14 and Sites and Policies Plan Policy DMD2 require well designed proposals that will respect the appearance, materials, scale, bulk, proportions and character of their surroundings. The proposed materials are consistent with those in the street which would ensure the building physically integrates well with its surroundings and would positively contribute to the character of the street.
- 6.3.4 Overall, the development is deemed to meet the requirements of London Plan policies D4 and D6, Core Strategy Policy CS14 and Sites and Policies Plan Policy DMD2.

6.4 Quality and mix of accommodation

- 6.4.1 Policy D6 of the London Plan 2021 states that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of residents without differentiating between tenures. The London Plan Housing SPG 2016 states that homes should provide a place of retreat; factors to be considered include privacy, the importance of dual aspect development, noise mitigation, floor to ceiling heights and daylight and sunlight. Policy DMD2 of the Adopted Sites and Policies Plan states that developments should provide for suitable levels of privacy, sunlight and daylight and quality of living conditions for future occupants.
- 6.4.2 The internal floorspace for all five units have been assessed against the 'Technical housing standards – nationally described space standard' document. All habitable rooms are served by windows which are considered to offer suitable natural light, ventilation and outlook to prospective occupants. Each unit exceeds the minimum floorspace standards and are therefore deemed to be fit for purpose and will provide suitable levels of residential amenity for future occupants.

6.5 Provision of Amenity Space

- 6.5.1 In accordance with Policy DMD2 of the Council's Sites and Policies Plan and the London Plan 2021, that there should be 5sqm of external space provided for 1 and 2 person flats with an extra square metre provided for each additional occupant. The ground floor flats would be provided with outdoor amenity space by private gardens, the flats on the upper floors would have access to a communal garden that measures over 90 sq/m.

6.6 Impact upon neighbouring Properties

- 6.6.1 Sites and Policies Plan Policy DMD2 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.
- 6.6.2 It is important to emphasise here that paragraph 123 of the NPPF (2019) very clearly states "local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for houseing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)".
- 6.6.3 There will be no material impact upon habitable room windows on the adjoining properties in terms of sunlight, daylight, and internal daylight. Moreover, there will be no material impact in terms of overshadowing of neighbouring gardens.
- 6.6.4 In terms of overlooking, there will be no material increase in the level of overlooking that already exists at the rear of these properties
- 6.6.5 In light of the above, it is considered the proposal accords with Policy DMS1 of the DMPD.

6.7 Transport

- 6.7.1 This proposed development is in an area with a public transport accessibility level of 2, but on the cusp of level 3 on a scale of 1 – 6b where 6b is excellent. It is within 150 m of the bus stops on Phipps Bridge Road and 150m from
- 6.7.2 Section 9 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.7.3 Policy T4 of the London Plan states that the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be considered and mitigated. Development should not increase road danger.
- 6.7.4 Core Strategy Policy CS18 Active Transport and CS19 Public Transport and DMT1-T5 are all aimed at supporting and promoting sustainable transport and active travel. In accordance with policy, the development includes residential cycle parking facilities to secure covered and

conveniently sited positions with good access to the street. They will be easy for occupants to use and manoeuvre cycles.

6.7.5 Four off-street parking spaces are proposed, a Parking Survey was undertaken as part of the application opposite at 5 New Close – see application 19P2684 two years ago and that had an average parking density of 78.5%, somewhat below the 95% critical margin. As the existing property currently has no off-street parking it is considered the 1-bedroom/1-person unit would create less parking issues than the current family unit which has two cars.

6.7.6 A secure communal bike storage has been proposed that would meet the minimum requirement of bikes required for this unit/person mix.

6.8 Refuse

6.8.1 Policy 5.17 of the London Plan and Policy CS 17 of the Core Strategy require all new developments to incorporate integrated and well-designed waste storage and collection facilities that include suitable recycling facilities. The timber refuse storage enclosure would be located to the front of the property behind soft landscaping so it cannot be viewed from the street. The bin storage would comprise 1x 660L euro bin for refuse, 1x 660L euro bin for recycling for the 5 units which is above minimum requirements.

6.9 Energy and Sustainability

6.9.1 Draft Policy DMH4 – Redevelopment of a single dwelling house introduces 3 requirements, namely that new development will exceed the minimum sustainability requirements outlined in Meton's Core Planning Strategy 2011 Policy CS15 through:

(a) Limiting CO2 emissions arising from the operation of the dwelling and its services in line with Code for Sustainable Homes Level 5;

(b) improving the fabric energy efficiency performance in line with Code for Sustainable Homes level 5; and

(c) Making effective use of resources and materials in accordance with Merton's Core Planning Strategy CS15(part a).

6.9.2 The Sustainability Statement by Revive Renovations Ltd submitted in support of the application sets out the proposed energy strategy for the development and concludes that the development will meet Building Regulations (Part L1a 2013). In summary, the proposed site responds to cost effective strategies, with low environmental impacts that would tackle both climate change and fuel poverty, all based on Merton Council and London Plan for Sustainable Design and Construction standards.

6.9.3 The proposed development will achieve 79.4 % CO2 emissions reductions emissions for all regulated emissions under the Be Lean / Be Clean scenario as per the London Local Plan 2021. Further details can be found in attached sustainability statement.

6.9.4 The development will be Air Quality Neutral as stated on Page 3 of the draft guidance: Developments, including major developments which do not include additional emissions sources are assumed to be Air Quality Neutral and do not need an Air Quality Neutral assessment. This would include, for example, developments that do not include new combustion plant such as gas-fired boilers. It is good practice to advise the local planning

authority of this when submitting a planning application, for example in a cover letter or the planning statement.

- 6.9.5 The proposed development would achieve an internal water efficiency consumption of less than 105 litres / person / day as stated in The Sustainable Design and Construction Supplementary Planning Guidance, Mayor of London, April 2014. Further details can be found in attached sustainability statement.

6.10 Flood Risk

- 6.10.1 Flood Risk Policy SI12 of the London Plan 2021, Policy CS16 of the Core Strategy 2011 and Policy DMF1 of the Site and Policies Plan 2014 seek to ensure that development minimises the impact of flooding. No part of the site is within a Flood Zone.

- 6.10.2 As the site is located outside of a Flood Zone, the likely impacts from flooding from rivers, the sea or surface water run-off is very unlikely.

6.11 Fire Safety

- 6.11.1 London Plan Policies D5 and D12 together with Local Plan Policy Q14 requires the application to be supported by a Fire Safety report to demonstrate how the development will meet the requirements of Approved Document B, Volume 1 of the Building Regulations.

- 6.11.2 A Fire Strategy report accompanies this application. The report sets out the detailed measures that have informed the scheme design and demonstrates that the development will have a level of fire safety equal to or greater than the general standard implied by compliance with Approved Document B.

- 6.11.3 The Fire Strategy demonstrates compliance with the aims and objectives of London Plan Policies D5 and D12.

7.0 CONCLUSIONS

- 7.1 In summary, this planning application will deliver the following planning benefits:

- Extensions and redevelopment of the existing building to provide a total of five residential dwellings will make a meaningful contribution to the housing needs of the borough in a sustainable brownfield location.
- The proposed units will be built to a high quality according with all relevant housing standards. Private amenity space will be provided for each flat.
- In doing so, a mix of units will be provided that will be suitable for a range of household types including families.
- The development has been designed to a high standard using high quality materials. The works will preserve and in places enhance the character and appearance of the street scene.
- The scheme promotes sustainable development through carbon reduction through energy efficient construction and appliances; and
- The site will be carefully landscaped and additional trees added where appropriate.

- 7.2 Against this background, the supplementary reports that accompany this planning application demonstrate that the development can be implemented without harm to the amenity of

neighbouring properties or the environment as a whole. Indeed, where possible, improvements have been made to the environment and the site as a whole.

- 7.3 It is considered that these laudable planning benefits weigh heavily in favour of supporting this planning application. In doing so, the proposal accords with the relevant development plan policies and should be properly granted planning permission.