



**WILKINSON**  
PLANNING

## Planning, Design and Access Statement

SITE

21 Winchester Street, Witchurch,  
Hampshire, RG28 7AH

PROPOSAL FOR

Erection of rear loft conversion

PROPOSAL BY

GRK Architecture Ltd

October 2023

## Contents

1.0	Introduction	2
2.0	Site and Surrounding Area	2
3.0	Proposal	3
4.0	Planning Policy	3
5.0	Planning History	6
6.0	Material Planning Considerations	6
7.0	Planning Balance	13

## 1.0 Introduction

- 1.1 This statement is prepared in support of an application submitted by GRK Architects, in respect of; Erection of rear loft conversion.
- 1.2 It will consider the planning legislation including the relevant material planning considerations engaged in the proposed development.
- 1.3 The extract below shows the site’s location compared to its surroundings.

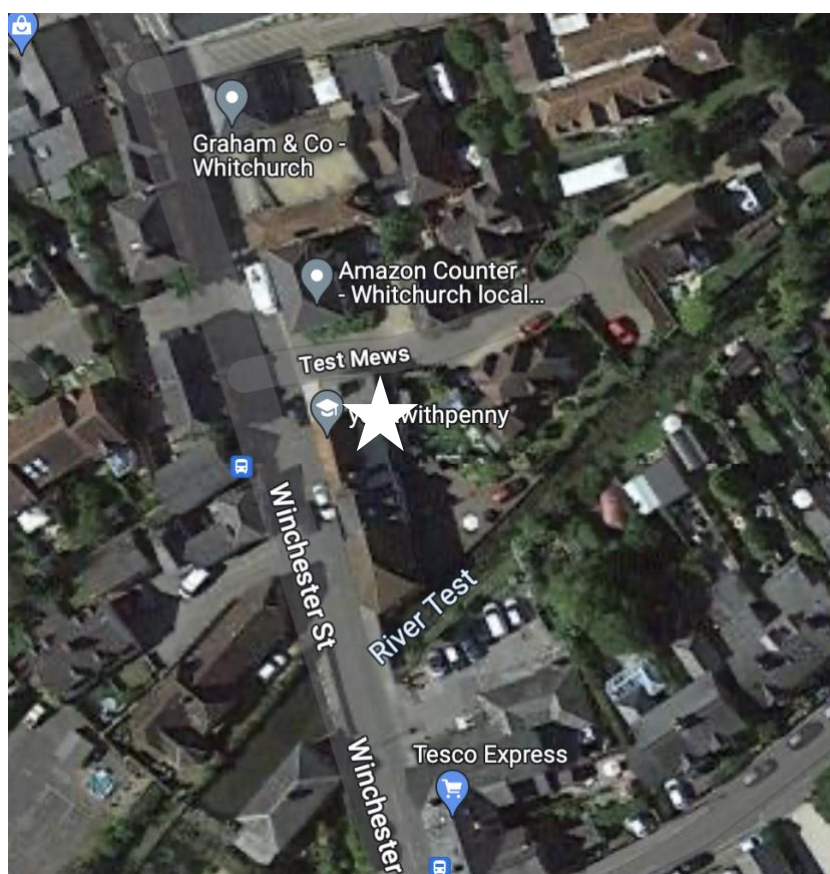


Figure 1.4.1 Aerial View

## 2.0 Site and Surrounding Area

- 2.1 The host dwelling is a two-storey mid terrace property, adjacent to the highway of Winchester Street. The site has direct neighbours to the north, east and west with an attached neighbour to the south.

2.2 The site does not contain any listed buildings however the southern and western neighbours are listed. The site falls within a Conservation Area and is within the setting of an Area of Outstanding Natural Beauty. There are no trees on site that will be impacted by this proposal. The site is located in flood zone 3 and is at a low risk of surface water flooding.

### 3.0 Proposal

3.1 The proposal is for; Erection of rear loft conversion. The accompanying plans provide context for the application.

3.2 The application is supported by a suite of plans and documents including:

- Application Form
- Planning Drawings
- Planning Statement

### 4.0 Planning Policy

4.1 The National Planning Policy Framework 2021 (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, then that determination must be made in accordance with 'the Plan' unless material considerations indicate otherwise. The policies contained within the NPPF are a however material consideration and should be taken into account for decision-making purposes.

4.2 The NPPF is supported by the Planning Practice Guidance (PPG), which assists applicants and decision makers in interpretation the NPPF.

4.3 The site falls within the Neighbourhood Plan area for Whitchurch, which was adopted in 2014.

4.4 The adopted development plan for Basingstoke and Deane consists of:



#### Whitchurch Neighbourhood Plan (2014)

- GD1 - Re-enforcement of the adoption of the Whitchurch Design Statement as 36 supplementary guidance to be used in the planning process
- LD2 – Protection of biodiversity and landscape
- TR1 – Traffic and parking policy

#### Basingstoke and Deane Local Plan (2011)

- SD1 - Presumption in Favour of Sustainable Development
- SS5 - Neighbourhood Planning
- EM1 - Landscape
- EM7 - Managing Flood Risk
- EM10 - Delivering High Quality Development
- EM11 - The Historic Environment
- CN9 - Transport

#### Supplementary Planning Documents

- Design and Sustainability (2018)
- Landscape, Biodiversity and Trees (2018)
- Parking Standards (2018)
- Heritage (2019)

#### National Planning Policy Framework (2021)

- Para 7: Achieving sustainable development
- Para 8: Three dimensions to sustainable development
- Para 10 - 12: The presumption in favour of sustainable development
- Para 38- Positive decision-making
- Para 47 - 50: Determination of planning applications
- Para 79 - Rural Housing
- Para 105 - 111: Highways impacts
- Para 126: Good design
- Para 130: Achieving well-designed places
- Para 159 - 169: Flood risk
- Para 174: Protecting the natural environment
- Para 189 - 208: Conserving and enhancing the historic environment



4.5 The NPPF sets out the Government’s planning policies for England and how these should be applied. Paragraph 7 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 of the NPPF identifies three overarching objectives in order to achieve sustainable development. The NPPF goes on to state, however, that *“they are not criteria against which every decision can or should be judged”* (para. 9). The policy paragraphs, footnotes, and annexes to the NPPF should be considered as a whole. Nevertheless, the key considerations that apply to this appeal are dealt with below.

4.6 Paragraph 11 of the NPPF confirms that there is a presumption in favour of sustainable development.

4.7 It will be shown that the application accords with the development plan as a whole because of its compliance with the important policies for its determination. Such a view is entirely consistent with the recent *Corbett* judgment of the Court of Appeal (*Cornwall Council v Corbett* [2020] EWCA Civ 508). Thus, in accordance with NPPF para. 11(c) planning permission should be granted without delay.

4.8 The courts have explained how the “tilted balance” operates in such circumstances. For example, in the case of *Cheshire East vs SSCLG* (2016) EWHC 571 (Admin), Mr. Justice Jay stated:

*“Another way of putting the matter is that the scales, or the balance, is weighted, loaded, or tilted in favour of the proposal. This is what the presumption in favour of sustainable development means: it is a rebuttable presumption, although will only yield in the face of significant and demonstrable adverse impacts.”*

4.9 As this statement will explain, the proposal can avoid adverse effects and therefore there is no policy basis to disapply the tilted balance in this case. The opportunity to make a contribution to the housing quality in the plan area, in the short term, is a very important benefit in socio-economic terms alongside its ecological and energy efficiency credentials.



4.10 An assessment of the proposal under the above policy context is detailed below and in consideration of the planning matters material to this application. It will be demonstrated that the proposed development not only adheres to the development plan as a whole first and foremost, but also adheres to the policies of the NPPF. Planning permission should be granted without delay where there are overriding benefits in allowing development to proceed.

## 5.0 Planning History

5.1 There is no planning history available on the Council's website.

## 6.0 Material Planning Considerations

### 6.1 Principle of Development

6.2 The presumption in favour of sustainable is set out in policy SD1 of the development plan and seeks to replicate the terms of the presumption as found within paragraph 11 of the NPPF. It is clear, therefore, that the presumption is set out within the development plan and, as such, the application of the presumption is not simply weighed as a material consideration within the NPPF but is a consideration against which all proposals must be determined. The development plan has primacy, and the LPA would be incorrect in law if they chose not to apply it.

6.3 Policies EM10 of the Local Plan and GD1 of the Neighbourhood Plan seek to secure high quality design of development that responds positively to its setting and the surrounding character. GD1 specifically refers to the Whitchurch Design Statement (2004) which outlines guidelines on how development affect different aspects of the Town should be carried out.

6.4 The principle of extending a residential dwelling is set out within the policies listed above, subject to assessment against other policies where relevant. This statement will go on to discuss these policies in turn.



- 6.5 At a national level, paragraph 10 of the Revised NPPF states; *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”*.
- 6.6 Paragraph 38 of the NPPF states; *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.
- 6.7 Paragraph 119 provides further commentary on making effective use of land, stating that; *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*.
- 6.8 The principle of development is supported at a local and national level. The scheme would provide additional living space without harm. The design is sympathetic and will enhance the backdrop of the locality. The principle of the proposal is acceptable in this respect, and there is nothing before the LPA to suggest otherwise.
- 6.9 Design and Layout
- 6.10 Policies EM10 and GD1 work inter alia to encourage good design and layout for all developments, with policy GD1 of the Neighbourhood Plan referencing the Whitchurch Design Statement (WDS). These policies set out criteria for development to meet in order to harmonise with the local character and environment.
- 6.11 The LPA will grant permission for proposals which meet the design criteria. Furthermore, the NPPF places a strong emphasis on good design, in particular through chapter 12 ‘Achieving well-designed places’ containing a number of policies which can support the delivery of good design and stating that planning decisions should ensure that developments at paragraph 130; *“are visually attractive as a result of good architecture”*. Consideration must also be afforded to the Nationally Described Space Standard (NDSS).



- 6.12 The WDS provides guidance on how to development can be sympathetic to the identified character in Whitchurch. The document describes buildings along Test Mews as buildings of value that are not listed. There is no policy that refers to their protection and this is not a statutory designation that warrants consideration or protection.
- 6.13 The WDS continues to encourage development that specifically preserve the variety of roof lines and styles, stating that three-storey buildings are appropriate for their immediate surroundings. The proposal would not impact the roof line of the building and would instead extend out of the roof slope. This is a typical and characteristic extension to buildings within settlement boundaries where there is limited space for ground floor extensions.
- 6.14 The proposal would be well designed, having due regard to the context of the site. The context of the site and its surroundings have dictated the materials that will be used on the extension. The materials are sympathetic to the constraints of the site and would appear consistent with the existing built form without deterring from the character of the area.
- 6.15 The proposal is therefore considered in accordance with the policies within the development plan, it would reflect and retain the local character of the area as identified in the Design Statement whilst adopting strategies within the Design and Sustainability SPD. Impacts on residential amenity and Heritage Assets will be addressed in turn, below.
- 6.16 Highways
- 6.17 Policies CN9 and TR1, and paragraph 110 of the NPPF confirms 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. The courts have held that the principle should not be interpreted to mean anything other than a severe impact on highway safety to be acceptable (*Mayowa-Emmanuel v Royal Borough of Greenwich [2015] EWHC 4076 (Admin)*), which this proposal does not create.
- 6.18 Local policies seeks to ensure that adverse impacts are avoided within busy locations through the management of road users and the spatial provision required for them. The Council has an SPD that relates to parking standards setting out minimum dimensions for parking spaces, and the minimum parking provision requirements. This document requires that 2-3 no.

bedroom units must have 1.75 spaces available when 20%-50% of spaces available are unallocated.

- 6.19 This requirement increases depending on bedroom numbers. Considering the sustainable location this site benefits from, being with the settlement boundary of the Town, it is unreasonable for the Council to require another additional parking space, in this outer urban area.
- 6.20 The spatial parameters of the site mean an appropriate level of parking provision in accordance with policies CN9 and TR1 and the Parking Supplementary Planning Document (2018). The proposal responds well to policies CN9 and TR1 paragraphs 105, 110 and 111 of the NPPF, and the Parking Standards, all underpinned by Case Law. There is nothing before Officers to suggest the scheme should be refused upon highways grounds.
- 6.21 Flood and Water
- 6.22 The site is set within Flood Zone 2 and 3.
- 6.23 As per paragraph 167 and footnote 55 of the NPPF, all development in flood zones 2 and 3 shall be supported by a site-specific flood risk assessment (FRA). This FRA should be proportional to the works proposed, identifying the risk of flooding, and ensuring the proposal will be safe for the duration of its lifetime.
- 6.24 The proposal is for a householder extension and so is not subject to the sequential test, nor the exception test however, must still meet the requirement of footnote 55 as noted above. Policy EM7 and paragraph 167 of the NPPF seek to ensure developments are safe from flood risk by sequentially assessing alternative locations, and by securing flood mitigation measures.
- 6.25 The flood risk has been identified above. The proposal seeks permission for the construction of a rear loft conversion, The additional built form would extend from the existing roof slope and so there would be no additional hardstanding on site and therefore no change in surface water runoff.

6.26 Policy EM7 reflects the aims of the NPPF by securing development avoids areas vulnerable to flooding through a sequential approach, and consequent flood mitigation measures. The proposal is considered wholly compliant with this policy. A sequential approach is not applied to householder extensions, and the extension would not be subject to any flood risk, considering its elevation.

6.27 Considering the aims of the NPPF and the policies within the development plan, the proposal is not subject to the sequential or exception test. The proposal would not impact flood risk in the local area, nor would it displace the flooding elsewhere.

6.28 Sustainability

6.29 Paragraph 8 of the NPPF sets out three dimensions for sustainable development:

*“a) an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

6.30 Economically, the proposal would generate a benefit for local trade before, during and after construction. The extension would facilitate an additional bedroom so financially, the proposal would increase the council tax the occupant contributes.



- 6.31 Socially, the space provided will enable good domestic enjoyment without materially hindering or oppressing the social enjoyment experienced by locals.
- 6.32 Environmentally, the site benefits from connections. The proposal does not offer a materially harmful character area or residential amenity intrusion. The proposed works will exceed current Building Regulations standards, embedding positive measures to reduce carbon emissions and energy usage.
- 6.33 Notwithstanding the limited harm this scheme would create, these benefits are considered to go a significant way in offsetting any limited environmental harm that may occur. As such, any harm would not significantly and demonstrably outweigh the benefits of the scheme.
- 6.34 The proposal reflects the essence of paragraph 8 of the NPPF, and is therefore considered economically, socially and environmentally sustainable.
- 6.35 Residential Amenity
- 6.36 As above, policy EM10 outlines requirements of development to achieve high quality design. Point 2(b) specifies that design must consider overlooking, access to natural light, outlook and amenity space, in accordance with the Design and Sustainability SPD.
- 6.37 The principles within the SPD reflect the aim of paragraph 130 of the NPPF and seek to retain existing amenity enjoyed by neighbours. The proposal would create a third-floor level window through the dormered extension which would create an additional viewpoint, whereby mitigation could be applied and secured through planning condition.
- 6.38 The limited overlooking that could occur is therefore not considered to create an adverse impact on the amenity enjoyed by neighbours. The level of harm created by the development would be limited nugatory. Therefore the application is considered to be in accordance with policies within the development plan and there is nothing before the LPA to suggest otherwise.
- 6.39 Landscaping

- 6.40 The proposal is in the setting of an Area of Outstanding Natural Beauty. Policies EM1 and LD2 seek to ensure development respects, enhances and does not have a detrimental impact on the character or visual amenity of the landscape. The Council also has an SPD that relates to Landscape, Biodiversity and Trees which was adopted in 2018. These policies and documents reflect the aims of paragraphs 130 and 174 of the NPPF.
- 6.41 The scale of this development is proportionate to the host dwelling. Its impact on the character of the area is limited to within the site boundaries, and the direct views available of the site from the highway of Test Mews. The proposal as above, would be of an appropriate design in both its scale and appearance, and would not appear incongruous in this location.
- 6.42 The proposal would not have a detrimental impact on the AONB and is therefore in accordance with policies EM1 and LD2, as well as the adopted SDP for Landscape, Biodiversity and Trees.
- 6.43 Heritage
- 6.44 The application site falls within a Conservation Area and is adjacent to several listed buildings. The proposal is therefore considered against policy EM11 which seeks to conserve or enhance the quality of the Council's heritage assets in a manner that is appropriate to their significance. The proposal is supported further by the SPD for Heritage that was adopted in 2019.
- 6.45 This policy sets out parameters that development that impact the historic environment must satisfy to be considered acceptable. The building itself is not designated as an historically significant building and so its contribution to the Conservation Area's significance is limited.
- 6.46 As above, the proposal has been sympathetically designed having due regard to the constraints of the site, including the Conservation Area. The extension and associated works will use materials that respect the character of the host dwelling without impacting on the significance of the Conservation Area.
- 6.47 The overall design is typical of these proposals and would not appear incongruous in this location. The scale would not appear dominating or overbearing and would therefore not

compete with the significance of nearby listed buildings. Details regarding rainwater goods, fenestration details and material would all be secured through condition.

- 6.48 The Conservation Area Appraisal listed terracotta ridge tiles as a frequently used material within the area. Given its nature, this aspect of the proposal would be the most prominent. The materials are to match the host dwelling, respecting the design and character of the host dwelling in line with policy EM10. There is no mention of this building contributing to the significance of the Conservation Area, nor the highway that serves it. There are no recognised vistas that include this building and so the impact this proposal would have on the significances of the designated heritage asset is limited.
- 6.49 The proposal is therefore considered wholly in accordance with policy EM11 of the Local Plan, and reflects upon the Conservation Area Appraisal and Heritage SPD by means of its design and scale. The proposal is not considered to harm any designated heritage asset and therefore paragraph 202 of the NPPF is not engaged, and the balance of public benefit is not engaged. The applicant is aware of the likely imposition of planning conditions and welcomes discussions to secure the proposal is acceptable in regard to heritage.

## 7.0 Planning Balance

- 7.1 The proposal seeks planning permission for; Erection of rear loft conversion. The applicant acknowledges the Council's position concerning planning conditions and welcomes discussion around agreement of conditions.
- 7.2 There is no reason to undermine the principle of development in light of the material planning considerations engaged by the proposal put forward.
- 7.3 The proposal is a wholly deliverable prospect, making effective use of land, without undue harms. The scheme is robustly supported at a local and national level offering a sustainable scheme which is heavily aligned to local and national planning policies.
- 7.4 In light of this and taking account of all the considerations set out above, it is hoped that the LPA will support this sustainable development by granting planning permission in the terms requested.

