

Committee	PLANNING COMMITTEE A	
Report Title	60-66 TAUNTON ROAD SE12 8PB	
Ward	Lee Green	
Contributors	Julia Robins	
Class	PART 1	29 JANUARY 2015

Reg. Nos. DC/14/ 89249

Application dated 22.10.2014

Applicant Bramerton London on behalf of Mr Grievson

Proposal Application submitted under Section 73 of the Town and Country Planning Act 1990 for a Minor Material Amendment in connection with the planning permission dated 24 March 2011 (DC/10/75529) for the construction of a part single/part two storey, three bedroom house to the rear of 60, 62, 64 & 66 Taunton Road SE12, together with the provision of bin stores, 4 cycle spaces and 2 car parking spaces with access onto Taunton Road to allow changes to the internal layout, external alterations and the lowering of the floor slab at ground floor level.

Applicant's Plan Nos. Proposed Plans: 08-1228 P 03 rev A
Contextual elevations, 08-1228 P02 Rev D
Proposed elevations (03/12/14)

Background Papers (1) Case File LE/445/66/TP
(2) Local Development Framework Documents
(3) The London Plan

Designation Lee Manor Conservation Area
Not a Listed Building

1.0 Property/Site Description

- 1.1 The site originally formed part of the curtilage of 66 Taunton Road which is an extended two storey, semi-detached property on the north side of Taunton Road.
- 1.2 Planning permission was granted in March 2011 for the construction of a part single/part two storey, three bedroom house within the rear part of the garden with access onto Taunton Road. Building works began on the site on 14th March 2014 and construction of the building is now well advanced at the site.
- 1.3 No. 66 Taunton Road originally had a garage at the side and a large L-shaped garden, part of which extended along the rear boundaries of nos. 60, 62 and 64 Taunton Road.

To the north and west the site boundary comprises a 1.8m high brick wall which is the boundary wall of Manor House Gardens, while the remaining boundaries comprise timber fencing. To the east the site abuts part of the garden of 58 Taunton Road.

- 1.4 To the north and west the site abuts Manor House Gardens. On the west side of the property there is a pedestrian entrance to Manor House Gardens. Within the park, to the rear of the property, is a fenced ball games court.
- 1.5 The site lies within the Lee Manor Conservation Area.

2.0 Planning History

- 2.1 2002 – DC/02/51792. Certificate of Lawful Development issued in respect of the demolition of the existing single storey kitchen extension at the rear and the construction of a larger single storey replacement kitchen extension.

2002 – DC/02/52488. Permission refused for the construction of a two storey extension to the side of 66 Taunton Road SE12 together with a single storey extension to the rear to provide additional living accommodation. A subsequent appeal was dismissed.

2007 – DC/07/67313. Permission granted for the retention of a yellow brick boundary wall to the rear garden of 66 Taunton Road SE12.

2011 - DC/10/75529 Permission was granted (24/03/11) for the construction of a part single/part two storey, three bedroom house within the rear part of the garden together with the provision of bin stores, 4 cycle spaces and 2 car parking spaces with access onto Taunton Road. The approved dwelling is modern in design and designed in the form of two rectangular 'blocks' with a central linking element. The two blocks are different in size and scale as the block closest to the rear gardens of the neighbouring properties in Taunton Road would be single storey with a mono-pitched roof that slopes down to the southern boundary. The larger block would be aligned with the northern site boundary to the park, and would be two storeys, partly set into the site. This would have a larger footprint and would also have a mono-pitch roof that would slope down toward the park boundary. The link element would be substantially glazed.

- 2.2 The area between the flank of no.66 and the park boundary would be laid out as a driveway to provide vehicular and pedestrian access to the proposed new house and would open out to an area of hardstanding where two car parking spaces and turning space is proposed. Cycle and refuse storage is also proposed within this area.
- 2.3 There would be areas of garden for the new property on three sides with the main garden area to the eastern end of the site.
- 2.4 Conditions 1, 3, 5, 7 and 8 of the 2011 planning permission were discharged during 2013.
- 2.5 Development works began on the site on 14th March 2014.

3.0 Current Planning Application

3.1 This application has been submitted under Section 73 of the Town and Country Planning Act 1990 and seeks to amend the 2011 planning permission to allow Minor Material Amendments to the consented scheme involving changes to the internal layout, external alterations and the creation of a half basement throughout.

3.2 The originally consented scheme was for the construction of a part single/part two storey, three bedroom house to the rear of 60, 62, 64 & 66 Taunton Road SE12, together with the provision of bin stores, 4 cycle spaces and 2 car parking spaces with access onto Taunton Road. The proposed amendment would alter the internal layout.

3.3 The alterations proposed are as follows:

- A reduction in the ground floor slab level on the south side of the building to enable the creation of a further level of accommodation to the south side of the building, resulting in the provision of three bedrooms at first floor level. In the consented scheme one bedroom was at ground floor level;
- The provision of full height glazing on the north west elevation and glazing up to roof level on the south east elevation;
- The introduction of a band of timber panelling across the centre of the window on north west elevation and an of area of panelling above the entrance door;
- Given that the floor level would be lowered on one side of the building there would be a greater amount of cladding on the front and rear elevations
- Alterations are proposed to the internal layout.

3.4 In the proposed scheme by reducing the floor level it enables there to be sufficient headroom to insert an additional level into the southern side of the building. The proposed layout would be an open-plan living room/dining room/kitchen on the northern side of the building, a central hall with staircase, and on the southern side there would be a 'snug', shower room, utility room and study. On the first floor there would be a master bedroom on the southern side with a large ensuite and two bedrooms and a family bathroom on the northern side.

3.5 The consented scheme involved a dropped floor level on the northern side of the building and this application proposes this within the remainder of the house, resulting in a lowered floor level across the whole building. The floor level would drop down by approximately 0.5m on the southern side.

4.0 Consultation

4.1 This section outlines the consultation carried out by the Council following the submission of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.

- 4.2 Site notices were displayed and letters were sent to residents in the surrounding area and the relevant ward Councillors.
- 4.3 Six objections were received in response to the consultation from the following properties 56, 58, 60, 64, 73 and 106 Taunton Road. The planning issues raised are:
- These changes dramatically increase the size of the house from a 3 bedroomed house to a 5 bedroomed house;
 - Traffic will increase entering this very narrowly accessed site. There will be further considerable traffic impact on the traffic and access of more cars close to park gates;
 - It will make neighbouring properties far more overlooked and increase loss of privacy– especially with the addition of glass doors opening out on the newly proposed first floor;
 - Removal of wooden cladding will significantly affect the aesthetic and environmental impact of the building which sits in a sensitive conservation area. This rolls back on some of the proposed eco credentials and design elements of the property and will make it far less attractive. It will make it far more visible for neighbours and far from the promised ‘invisible’ building;
 - Objection to full height glazing to master bedroom, bedroom 2 and other proposed glazing changes;
 - Object due to more light pollution spilling into rear garden of no. 60.
 - Even further light leakage through increased glazing, spoiling others back gardens and potentially reducing bird life. Already lots of outdoor lights are planned for the front and back garden which will significantly alter the neighbours enjoyment of their gardens changing their outlooks and park views even further.
 - Concerned about “mission creep” associated with these changes. The original plan was approved under the strict proviso that it would not change. If the additional storey is approved how long before a change to add roof windows is made?
 - Feels like a material not minor change;
 - The scale of the property is already being felt with its dominant position between Taunton Road and Manor House Gardens;
 - Goes against everything the ‘conservation’ status was set up for;
 - This road has a community feel and consists of modest house and this house would be much more than modest;
 - It has the community up in arms about its size and impact on the conservation area;
 - Adding windows would have a significant impact on the houses that back onto the site and park users;
 - House is looking over the park.

5.0 Policy Context

Introduction

5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

A local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL)

5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Lewisham comprises the Core Strategy, the Development Management Local Plan, the Site Allocations Local Plan and the Lewisham Town Centre Local Plan, and the London Plan. The NPPF does not change the legal status of the development plan.

National Planning Policy Framework

5.3 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14, a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary, this states in paragraph 211, that policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. As the NPPF is now more than 12 months old paragraph 215 comes into effect. This states in part that '...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.

5.4 Officers have reviewed the Core Strategy for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraphs 211, and 215 of the NPPF.

Other National Guidance

- 5.5 The other relevant national guidance is:
- Flexible options for planning permissions
 - Conserving and enhancing the historic environment
 - Design
 - Climate change
 - Renewable and low carbon energy

London Plan (July 2011)

- 5.6 The London Plan policies relevant to this application are:
- Policy 5.3 Sustainable design and construction
 - Policy 7.3 Designing out crime
 - Policy 7.6 Architecture
 - Policy 7.8 Heritage assets and archaeology
 - Policy 7.18 Protecting local open space and addressing local deficiency

London Plan Supplementary Planning Guidance (SPG)

- 5.7 The London Plan SPG's relevant to this application are:
- Housing (2012)
 - Sustainable Design and Construction (2006)

Core Strategy

- 5.8 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Development Management Local Plan and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Core Strategy Policy 8 Sustainable design and construction and energy efficiency

Core Strategy Policy 15 High quality design for Lewisham

Core Strategy Policy 16

Development Management Local Plan

- 5.9 The Development Management Local Plan was adopted by the Council at its meeting on 26 November 2014. The Development Management Local Plan, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Core Strategy and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Development Management Local Plan as they relate to this application:

- 5.10 The following policies are considered to be relevant to this application:
- DM Policy 1 Presumption in favour of sustainable development

DM Policy 22	Sustainable design and construction
DM Policy 30	Urban design and local character
DM Policy 32	Housing design, layout and space standards
DM Policy 33	Development on infill sites, backland sites, back gardens and amenity areas
DM Policy 36	New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens

Residential Standards Supplementary Planning Document

- 5.11 This document sets out guidance and standards relating to design, sustainable development, renewable energy, flood risk, sustainable drainage, dwelling mix, density, layout, neighbour amenity, the amenities of the future occupants of developments, safety and security, refuse, affordable housing, self containment, noise and room positioning, room and dwelling sizes, storage, recycling facilities and bin storage, noise insulation, parking, cycle parking and storage, gardens and amenity space, landscaping, play space, Lifetime Homes and accessibility, and materials.

6.0 Planning Considerations

- 6.1 The main issues to be considered in respect of this application are:
- a) Principle of development
 - b) Impact of the proposed alterations on neighbouring properties
 - c) Significance of the changes on the elevations

Principle of Development

- 6.2 Since 2009 a process has been in place to enable formal consideration of modifications to approved proposals following the grant of planning permission. The applicant is entitled to apply to make amendments and has followed the formal process for making minor material amendments to the consented scheme. The NPPF Planning Practice Guidance Note: Flexible Options for Planning Permissions advises that there is no statutory definition of a minor material amendment, however it would normally include amendments where their scale and/or nature result in a development which is not substantially different from the one which has been approved. Where an application under s73 of the Town and Country Planning Act is granted, the effect is the issue of a new planning permission.
- 6.3 As outlined above in paragraph 2.4 the consented scheme is designed in the form of two rectangular 'blocks' with a central linking element. As consented, the northern (two storey) block involved a floor level set approximately 0.5m below the adjacent garden land level. The applicant now proposes to provide a lower ground floor slab for the entire building in the same way, so that all of the ground floor would be 0.5m below the adjacent garden land. This would allow the provision of an additional floor within the smaller southern block. The external envelope of the building is largely constructed and the height and form of the building (above the adjacent ground level) would not be altered.

6.4 The originally consented ground floor layout comprised a living room and kitchen on the northern side of the house, a hall with storage and staircase in the centre and master bedroom, and study on the southern side of the house. In the northern block at first floor level there would be two bedrooms and a family bathroom. In the proposed scheme, by reducing the floor level of the centre and southern blocks to the same level as consented for the northern block, sufficient internal headroom would be created so as to allow insertion of a first floor level into the southern block. This would result in an additional 29m² floor area, although due to the form of the sloping roof, a significant proportion of this would have limited floor to ceiling height. As a result the proposed ground floor layout would be an open plan kitchen/living/dining room on the northern side of the building, central hall way with staircase, and on the southern side there would be a 'snug', shower room, utility room and study. On the first floor there would be a master bedroom on the southern side with a large ensuite and two bedrooms and a family bathroom on the northern side.

6.5 The principle of making amendments in this case is considered acceptable, subject to consideration of the impact of the amendments and the design changes.

Impact on neighbouring properties

6.6 The proposal involves the reduction of the ground floor slab level of the whole building to the same level as consented for the northern block.

6.7 Externally while this would be visible on the southern and central element of the building, the external form and height of the proposed building would not change above current ground level. Nor would the external size of the property alter in relation to the surrounding garden land. As a result the proposed alteration to the ground floor slab level would not have a physical impact on the neighbouring properties in terms of loss of light and overshadowing.

6.8 The insertion of a first floor in the southern element is not considered likely to give rise to significantly greater impact from noise, disturbance or traffic movements from the new property than that which was consented, as it would remain a three bedroom dwelling, although all of the rooms would be more spacious and there would be a greater area of living accommodation on the ground floor.

6.9 No additional (or larger) window openings are proposed on the south-west elevation, which faces the rear gardens of neighbouring properties in Taunton Road. An additional Juliette balcony was proposed in the originally submitted plans on the north west elevation, however this has been deleted from the scheme. The Juliette balcony which was part of the consented scheme which is on the rear of the northern element of the house remains.

6.10 The application proposes to increase the height of the windows within the south east and north west elevations. The impact of this on neighbouring properties is considered minimal, given the location of the application property and the distance maintained between it and neighbouring properties. The property sits at right angles to the properties which front Taunton Road. Nos 62 and 64 face the flank elevation of the proposed

house, where no change is proposed to the proposed ground floor windows and flank of the property and as such the impact would be the same.

- 6.11 No. 60 and 66 have oblique views of the front and rear elevations of the application property. The windows in the both the front and rear elevations are recessed by 0.1m from the elevations and the sloping roof projects beyond the rear elevation by approximately 0.2m which partially obscures views from the windows to the gardens which abut the site. Whilst the rear elevation of the property is partly visible from these houses, it is not considered that the impact of the change in window height would have a significantly greater impact than with the consented scheme.
- 6.12 The difference in impact (i.e. on privacy and overlooking) to Nos. 56 and 58 Taunton Road whose gardens abut the rear of the application site, is considered to be negligible in comparison with the consented scheme, given the distance from the property and the fact that it is the end of the rear gardens which abut the application site.
- 6.13 In terms of the impact on No. 68, which is located on the opposite side of the pedestrian entrance to Manor House Gardens, there is sufficient distance and screening (in the form of trees on the property boundaries) such that the impact of the increase in the size of the windows would be minimal. Therefore the proposed elevation change is not considered to give rise to a greater impact.
- 6.14 As with the consented scheme, it is proposed to remove permitted development rights.

Design and Conservation Issues

- 6.15 Development Management Local Plan DM Policy 31 'Alterations and extensions to existing buildings including residential extensions' states that "*alterations and extensions, including roof extensions will be required to be of high, site specific, and sensitive design quality, and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys and porches. High quality matching or complementary materials should be used, appropriately and sensitively in relation to the context*".
- 6.16 DM Policy 36 states that the Council will not grant planning permission where development would be incompatible with the special characteristics of the area, its buildings, spaces, settings, form and materials.
- 6.17 In terms of appearance, the proposed full height glazing on the north west elevation and the extension of the glazing up to roof level on the south east elevation is considered not to be significant in terms of the overall design of the building, as the style of windows is maintained. The increase in glazing would mean that the amount of timber cladding is reduced. The change to the windows slightly changes the design of the south east and north west elevations and that change is considered to slightly improve on the approved design.
- 6.18 The introduction of a band of timber panelling across the centre of the window on north west elevation is considered to be a minor addition and would not detract from the appearance of the building.

- 6.19 The introduction of an area of solid panelling above the front door is also minor in nature and arises from the lowering of the slab level at the entrance to the new property.
- 6.20 The lowering of the ground floor slab level proposed results in minor changes to the south east and north west elevations - there would be a small increase in timber cladding across the bottom of the building on the south east elevation. This change is considered to be minor and would not detract from the appearance of the building.

7.0 Local Finance Considerations

- 7.1 Under Section 70(2) of the Town and Country Planning Act 1990 (as amended), a local finance consideration means:
- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
 - (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).
- 7.2 The weight to be attached to a local finance consideration remains a matter for the decision maker.
- 7.3 The Mayor of London's CIL is therefore a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

8.0 Community Infrastructure Levy

- 8.1 The above development is not CIL liable.

9.0 Equalities Considerations

- 9.1 Section 149 of the Equality Act 2010 ("the Act") imposes a duty that the Council must, in the exercise of its functions, have due regard to:-
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9.2 The protected characteristics under the Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 9.3 The duty is a "have regard duty" and the weight to attach to it is a matter for the decision maker bearing in mind the issues of relevance and proportionality. In this matter there is minimal/no impact on equality

10.0 Conclusion

- 10.1 This application has been considered in the light of policies set out in the development plan and other material considerations.
- 10.2 The proposed amendments are considered to be minor material in nature and the impact of the amendments are considered not to be significant for the reasons given above.
- 10.3 As the application is for a s73 application a new planning permission will be issued incorporating the relevant conditions from the original permission.

11.0 RECOMMENDATION GRANT PERMISSION subject to the following conditions:-

- (1) The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

08-1228/P.01, Proposed Plans: 08-1228 P 03 rev A Contextual elevations, 08-1228 P02 Rev D Proposed elevations (03/12/14), P.04, SK-10, Design & Access, Statement September 2010, Arboricultural Implication, Assessment Report by Thermo Ecology Ltd Ref, TE09-062-AIA-Doc 16 December 2009 and PPS 25 Flood Risk, Assessment by the Stilwell Partnership 22 September 2010

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

- (2) Prior to occupation of the development, the treatment of the external areas (including planting, paving and boundary treatments) shall be carried out in full accordance with the approval DC/13/85744 dated 11/03/2014. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the local planning authority has given written approval to any variation.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Core Strategy Policy 12 Open space and environmental assets, Policy 15 High quality design for Lewisham of the Core Strategy (June 2011), and DM Policy 25 Landscaping and trees and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

- (3) Prior to occupation of the development, the lighting to external areas within the site, including the proposed parking areas shall be carried out in full accordance with the approval DC/13/85743 dated 11/03/2014. Any such lighting shall be installed in accordance with the approved drawings.

Reason: In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which will minimise possible light pollution to the night sky and neighbouring properties and to comply with DM Policy 27 Lighting of the Development Management Local Plan (November 2014).

- (4) No plumbing or pipes, other than rainwater pipes, shall be fixed on the external faces of the building.

Reason: It is considered that such plumbing or pipes would seriously detract from the appearance of the building and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014)

- (5) No extensions or alterations to the building, whether or not permitted under Article 3 and Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 or any subsequent re-enactment thereof, shall be carried out without the prior written permission of the local planning authority.

Reason: In order that, in view of the nature of the development hereby permitted, the local planning authority may have the opportunity of assessing the impact of any further development and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011).

- (6) No deliveries in connection with construction works shall be taken at or despatched from the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

Reason: In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Paragraph 120 of the National Planning Policy Framework and DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

- (7) The external finishes of the building hereby approved shall be carried out in full accordance with the approval DC/13/85744 dated 11/03/2014.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the building and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development Management Local Plan (November 2014) DM Policy 30 Urban design and local character

- (8) The building shall not be occupied until the pavement crossover serving the property and the restoration of the footway have been carried out in full accordance with the approval of the Council's Highways Group.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the development and to comply with Policies 14 Sustainable movement and parking and 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

- (9)
- (a) Prior to occupation of the development, the treatment of the roof areas (including planting) shall be carried out in full accordance with the approval DC/13/85742 dated 11/03/2014.
 - (b) The living roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.
 - (c) The development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the local planning authority.

Evidence that the roof has been installed in accordance with sub-points (a) to (c) above shall be submitted to and approved in writing by the local planning authority prior to the first occupation of the development hereby approved.

Reason: To comply with Policies 5.10 Urban greening, 5.11 Green roofs and development site environs, 5.12 Flood risk management, 5.13 Sustainable Drainage and 7.19 Biodiversity and access to nature conservation in the London Plan (2011) , Policy 10 managing and reducing flood risk and Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 24 Biodiversity, living roofs and artificial playing pitches of the Development Management Local Plan (November 2014)