Application No: 2017/2261  
Type: FULL  
Case Officer: Peter Brooks  
Ward: Weybridge St Georges Hill Ward  
Location: Cherrys St Georges Avenue Weybridge Surrey KT13 0BS  
Proposal: A pair of two-storey semi-detached houses and a two-storey detached house, all with rooms in the roofspace and dormer windows, integral garages for Plots 1 & 2 and an attached garage for Plot 3, new access and 1m high front boundary wall following demolition of existing house  
Applicant: September Properties  
Agent: Mr Graeme Free  
DLP Planning Ltd  
4 Abbey Court  
Fraser Road  
Priory Business Park  
MK44 3WH  
Decision Level: If Permit – Sub Committee  
If Refuse – Sub Committee  
Recommendation: Permit  

Representations: 7 letters of objection have been received raising the following points:  
- Parking/highway safety  
- Loss of trees/landscaping  
- Over development of the site  
- Density  
- Harm to neighbouring amenity (light/privacy/outlook)  

This application has been promoted by Cllr Harman if the recommendation is to permit

Report

Description

1. The application site comprises a plot of land located to the south east of the junction of St Georges Avenue and Cavendish Road. The site is currently occupied by a single detached dwelling and a detached garage building. The wider area is characterised by a wide mix of dwelling types and sizes, of varying ages. There are examples of more contemporary replacement dwellings within the street that make more efficient use of urban land. The site is located within the Lower St Georges Hill and East of Brooklands Road character area as defined in the Weybridge companion guide to the Design and Character SPD.

Constraints

2. The relevant planning constraints are:  
- 5km buffer Thames Basin Heath Special Protection Area  
- SSSI impact risk zone

Policy

3. In addition to the National Planning Policy Framework and the National Planning Practice Guidance, the following local policies and guidance are relevant to the determination of this application:

Core Strategy 2011  
CS1 – Spatial Strategy  
CS2 – Housing provision, location and distribution
4. Relevant Planning History

<table>
<thead>
<tr>
<th>Reference</th>
<th>Description</th>
<th>Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016/2540</td>
<td>2 pairs of semi-detached houses (3 two-storey and 1 single storey) to include rooms in the roofspace, dormer windows, integral garages, new access and front boundary wall, gates and piers (a maximum of 2.4m high) following demolition of existing house</td>
<td>Refused</td>
</tr>
<tr>
<td>1983/0417</td>
<td>Erection of three detached houses and double garages following the demolition of Green Gables and stable block</td>
<td>Deferred indefinitely</td>
</tr>
<tr>
<td>1979/1429</td>
<td>Erection of 17 two storey town houses and 31 garages with access road following demolition of the existing houses</td>
<td>Refused</td>
</tr>
</tbody>
</table>

Proposal

5. Permission is sought for the erection of a pair of two-storey semi-detached houses and a two-storey detached house, all with rooms in the roofspace and dormer windows, integral garages for Plots 1 & 2 and an attached garage for Plot 3, new access and 1m high front boundary wall following demolition of existing house. The proposed pair of semi’s would be some 8.05m high, 18.3m wide and 13m deep (albeit they are staggered). The detached dwelling would be 8.05m high, 14.5m wide and 12.5m deep. Each dwelling would benefit from private amenity space and off street parking.

Consultations

6. Surrey County Council (Highways) – No objection subject to condition in relation to construction transport management plan and informatives.

7. Tree Officer – No objections subject to conditions in relation to tree protection.

8. Surrey Bat Group – No objections.

9. Natural England – No objections provided contribution toward SAMM being received.
Positive and Proactive Engagement

10. In assessing this application, officers have worked with the applicant in a positive and proactive manner consistent with the requirements of 186-187 of the NPPF by making available pre-application advice to seek to resolve problems before the application was submitted and to foster the delivery of sustainable development.

11. No formal pre-application advice sought prior to the submission of this application.

Planning Considerations

12. The main planning considerations in the determination of this application are:

- Previous reasons for refusal
- Principle of development
- Impact on the character of the area and the streetscene
- Impact on the amenities of adjoining properties and proposed occupiers
- Impact on highway safety and parking
- Impact on trees
- Impact on ecology
- Financial considerations

Previous reasons for refusal

13. The previous application was refused for 5 reasons, these are listed below:

1) Due to its contrived layout, limited separation distances to the site boundaries, mansard roof design and excessive height, the proposal would result in a cramped and incongruous form of development harmful to the character of the surrounding area. As such, proposal is contrary to Policy CS4 and CS17 of the Elmbridge Core Strategy 2011, Policies DM2 and DM10 of the Development Management Plan 2015, the Design & Character SPD 2012 and the NPPF 2012.

2) The proposal would fail to provide adequate garden amenity spaces for the future occupiers of larger family dwellings on Plots A, B and C and would result in overbearing impact on the existing neighbouring properties and on the future occupiers of the development. As such, proposal is contrary to Policy CS17 of the Elmbridge Core Strategy 2011, Policies DM2 and DM10 of the Development Management Plan 2015, the Design & Character SPD 2012 and the NPPF 2012.


4) Due to the lack of a legal agreement to secure a financial contribution towards the Strategic Access Management and Monitoring (SAMM), the Local Planning Authority is unable to satisfy itself that the proposal would not result in any adverse impact on the integrity of the Thames Basin Heath Special Protection Area. As such, the proposal is contrary to the Policy CS13 of the Elmbridge Core Strategy 2011, the NPPF 2012 and the Developer Contributions SPD 2012.

5) In the absence of a completed legal agreement, the proposed development fails to secure the necessary affordable housing provision contrary to the requirements of Policy CS21 of the Elmbridge Core Strategy 2011 and the Developer Contributions SPD 2012.
Principle of development

14. The Core Strategy indicates that there is scope for residential development through the redevelopment of existing sites with well-designed schemes that integrate with and enhance the local character. The new development is required to deliver high quality design, which maximises the efficient use of land and which responds to the positive features of individual locations; integrating sensitively with locally distinct townscape while protecting the amenities of those living in the area. The Council promotes development that contributes to an overall housing target of 40 dwellings per hectare and achieves a minimum of 30 dwellings per hectare (dph).

15. The property is not listed or within a conservation area and therefore its redevelopment is considered acceptable in principle. The application site is currently occupied by a single detached dwelling having a density of approximately 7dph. The proposal would increase the existing density to approximately 21dph. Although the achieved housing density is not the minimum required by the policy, it is considered that it would assist in achieving the envisaged policy aimed housing density on this site, having regard to previous planning history, the plot shape and character of the area. As such, the proposed density is considered acceptable in principle in this instance, subject to the considerations below.

Impact on the character of the area and the streetscene

16. The proposed dwellings would comprise one pair of semis and one detached dwelling, which would be located towards the western (narrower) end of the site. The previous refused application ref. 2016/2540 was for two pairs of semis, with the western pair having a single storey house attached to a two storey house, all with mansard roofs. The proposal under consideration has taken a more traditional design approach, with two storey dwellings with pitched roof over with crown sections and rear dormers, so that the habitable accommodation within the roof is not readily visible from the street. The wider area is characterised by a wide mix of dwelling designs and types and the proposed mix here would not appear incongruous in this area. Indicative materials appear to be in keeping with the wider area but can be controlled by appropriate condition.

17. Due to the corner nature of the plot the development would be visible from different streets. Nevertheless it is considered the proposed design and layout of the proposed dwellings would not adversely impact the character of the area. The dwellings would project forward of the prevailing building line to the east, but not to such an extent that they would unacceptably harm the streetscene. The development would help ‘turn the corner’ with regard to its relationship to the dwelling to the southwest. The detached dwelling would be set away sufficiently from the corner of the site and the adjoining dwelling to the south west ‘Green Gables’ to avoid appearing cramped on the site. It is considered the reduced scale of the buildings would reduce the cramped appearance of the dwelling on site.

18. It is considered the proposal under consideration has overcome the first reason for refusal of the previously refused application. The removal of one unit and the design of the detached dwelling, and removal of mansard roof design, have resulted in a development that would not have a contrived layout, nor appear cramped. The height of the proposed dwellings would be comparable to those of neighbouring dwellings.

19. The proposed boundary treatment would be a low brick wall with planted hedge to the rear. The refused scheme proposed a brick wall with piers and railings (a maximum height of 2.1m), which was the third reason for refusal of the previous application. It is considered the amended design of the boundary treatment would overcome that reason for refusal. The low brick wall and hedge planting to the rear would be ‘softer’ than that previously proposed and comparable with other boundary treatments in the wider area. It is noted that the site was previously well treed and these trees had been felled prior to the previous application. A landscaping scheme could secure appropriate planting to mitigate for this loss.
20. It is therefore considered that the proposal has overcome those reasons for refusal attached to the previous application in regards to design and character, and the proposal would have an acceptable visual impact on the streetscene and the character of the area.

Impact upon the amenities of the adjoining properties and proposed occupiers

21. Any application should not lead to an unacceptably impact upon the amenities of the adjoining neighbouring occupiers. The proposed dwellings would not infringe a horizontal 45 degree line from the nearest principle habitable windows of the nearest adjoining dwellings. The 45 degree line is used as a guide to ensure new development does not block light reaching windows which serve habitable rooms. The closest dwellings most likely to be impacted by the site ‘Green Gables’ to the south west and ‘Greenmantle’ to the east. Due to the respective relationship and orientation between the proposed dwellings and these two properties it is not considered any unacceptable impacts in regards to light would occur.

22. The proposed dwellings would be separated at storey level from those properties at the rear (within The Gables) at a distance of approx. 19m at its closest point, but with a greater distance from other rear elevations due to the splayed nature of the proposed dwellings in relation to these properties to the south. It is considered this layout and relationship would in this instance be acceptable, having regard to the overlooking which already occurs from the existing dwelling, and the splayed nature of the relationship which would not result in direct overlooking. It is also worth noting that the previous application was not refused on any overlooking grounds, and these buildings were higher than those proposed now. Windows above ground floor would serve bathrooms and could be conditioned to be obscurely glazed to prevent overlooking to the flanks. It is considered the layout and relationship would not result in any overbearing impacts upon neighbouring properties.

23. Turning to the impact on the amenities of proposed occupiers, it is considered that all three units would meet the minimum internal space requirements as stipulated in the National Technical Housing Standard. In regards to proposed amenity areas, this was the second reason for refusal of the previous application. The proposed gardens would, due to the splayed rear boundary in relation to the rear of the dwelling, be at their shallowest point be shorter than the minimum 11m usually required, the gardens for Plot 1 and 2 however would exceed 11m at their deepest points. The garden for Plot 3 would be approx. 9m at its deepest point, but would also have a side garden area which is considered to provide sufficient private amenity space for the occupiers of this property. It is considered the proposed garden sizes would overcome the second reason for refusal of application 2016/2540.

Impact on highway safety and parking

24. The County Highway Authority was consulted on the application and raised no objections on highway safety grounds subject to the imposition of a condition in relation to a construction management plan being submitted prior to commencement.

25. The proposal would not see the creation of any new vehicle crossovers, although the existing two would be closed and repositioned to better align with the proposed dwellings. Each dwelling would be served by two off street parking spaces each (one garage space, one to the front of each dwelling). It is considered the proposed parking provision to be acceptable and in accordance with the Councils adopted standard. Whilst no specific cycle parking has been shown on the submitted plans the proposed dwellings and their amenity areas offer sufficient space to allow the storage of cycles for occupants.

Impact on trees

26. The Councils Tree Officer was consulted on the proposal and raised no objections subject to the imposition of conditions to secure tree protection. It was noted on the site visit that a number of trees had been felled on site, and this fact is supported by comments from neighbours and the previous officer’s report. Council records show none of these trees were protected or located within a conservation area so would not have required any consent to
remove. It is considered reasonable to attach a condition to secure some replacement tree planting to mitigate for this loss.

Impact on ecology

27. An ecology report has been provided, which found no evidence of roosting bats. No objection has been raised by Surrey Bat Group, as the evidence provided in the report is deemed to be sufficient subject to the recommendations being carried out in the submitted report.

28. The application site lies within the 5km buffer zone of the Thames Basin Heath Special Protection Area. To mitigate the impact of the additional residential occupancy within the buffer zone, the applicant is required to enter into a legal agreement to secure a financial contribution towards the Strategic Access Management and Monitoring (SAMM).

Financial Considerations

New Homes Bonus Scheme Grant Determination

28. Section 70 subsection 2 of the Town and Country Planning Act 1990 (as amended) states that any local financial considerations are a matter to which local planning authorities must have regard to in determining planning applications; as far as they are material for the application. The weight to be attached to these considerations is a matter for the Council.

29. The New Homes Bonus is a grant paid by central government to local councils for increasing the number of homes and their use. The New Homes Bonus is paid each year for 6 years. It is based on the amount of extra Council Tax revenue raised for new-build homes, conversions and long-term empty homes brought back into use. There is also an extra payment for providing affordable homes. The Council's New Homes Bonus Scheme Grant Determination for 2017/18 is £1.89m (approx.).

30. Local financial considerations are defined as grants from Government or sums payable to the authority under the Community Infrastructure Levy (CIL). This means that the New Homes Bonus Scheme Grant Determination is capable of being a material consideration where relevant. In the current case, the approval of the application would mean that the New Homes Bonus Scheme Grant Determination would be payable for the net increase in dwellings from this development.

Affordable Housing

31. The Council's approach to the provision of Affordable Housing is set out in Policy CS21 of the Core Strategy (July 2011) and the Developer Contributions Supplementary Planning Document (SPD) (April 2012), which states that development resulting in the net gain of 1-4 residential units should provide a financial contribution equivalent to the cost of 20% of the gross number of dwellings on site as Affordable Housing.

32. Following a Court of Appeal decision which found in favour of the Government, paragraphs 012-023 of the National Planning Policy Guidance on planning obligations have been reintroduced. These paragraphs and the Ministerial Statement are now a material consideration, alongside local planning policy, against which the Council must consider all planning applications. However, given that the local plan remains the primary consideration against which decisions must be made, the Council is continuing to apply policy CS21 Affordable Housing as set out in the Core Strategy. Following receipt of legal advice, the Council has produced a statement and update statement to set out local evidence in support of continuing to apply Policy CS21 to this application in light of the revised PPG. This is available to view on the Planning Services webpages. The proposal is also liable for a financial contribution towards SAMM as it is within the Thames Basin Heath 5km buffer zone.

33. Based on the above, the appropriate level of the financial contribution towards the affordable housing provision was calculated. Whilst at the time of writing a completed legal agreement
has not been received the applicant has indicated a willingness to secure the required affordable housing contribution and this matter will be updated during the committee meeting.

Community Infrastructure Levy (CIL)

34. The proposed development is liable for CIL. The applicant has provided the relevant liability forms required to pay the chargeable amount required by the Council’s adopted Charging Schedule in accordance with the relevant regulations.

Matters raised in Representations

35. Covered in the above report.

Conclusion

36. On the basis of the above, and in light of any other material considerations, the proposal is considered to be in accordance with the development plan. Accordingly, the recommendation is to grant permission subject to the receipt of a completed Unilateral Undertaking to secure the required affordable housing and SAMM contribution.

Recommendation: Grant Permission

Conditions/Reasons

1 TIME LIMIT (FULL APPLICATION)
The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

2 LIST OF APPROVED PLANS
The development hereby permitted shall be carried out in strict accordance with the following list of approved plans: PL03 Rev A, PL04 Rev A, PL05 Rev A and PL06 Rev A received on 19.07.2017.

Reason: To ensure that the development is carried out in a satisfactory manner.

3 MATERIALS SAMPLES
NO DEVELOPMENT SHALL TAKE PLACE UNTIL SAMPLES OF THE MATERIALS TO BE USED ON THE EXTERNAL FACES AND ROOF OF THE BUILDING HAVE BEEN SUBMITTED TO AND APPROVED IN WRITING BY THE BOROUGH COUNCIL. DEVELOPMENT SHALL BE CARRIED OUT IN ACCORDANCE WITH THE APPROVED DETAILS.

Reason: To ensure that a satisfactory external appearance is achieved of the development in accordance with Policy DM2 of the Elmbridge Development Management Plan 2015. It is considered necessary for this to be a pre-commencement condition because the use of satisfactory external materials goes to the heart of the planning permission.

4 OBSCURE GLAZING
The first floor flank windows on Plots 1 and 2 of the development hereby permitted shall be glazed with obscure glass and fitted with non-opening principal lights, and subsequently maintained in this form. Such glass shall be sufficiently obscure to prevent loss of privacy. The affixing of an obscure film will not be sufficient.
Reason: To preserve the reasonable privacy of neighbouring residents in accordance with Policy DM2 of the Elmbridge Development Management Plan 2015.

5 CONSTRUCTION TRANSPORT MANAGEMENT PLAN
No development shall commence until a Construction Transport Management Plan, to include details of:
(a) parking for vehicles of site personnel, operatives and visitors
(b) loading and unloading of plant and materials
(c) storage of plant and materials
(e) provision of boundary hoarding behind any visibility zones
(h) measures to prevent the deposit of materials on the highway
has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy DM7 of the Elmbridge Development Management Plan 2015 and CS25 of the Elmbridge Core Strategy 2011.

6 LANDSCAPING - SCHEME
NO DEVELOPMENT SHALL TAKE PLACE UNTIL FULL DETAILS OF BOTH HARD AND SOFT LANDSCAPING WORKS HAVE BEEN SUBMITTED TO AND APPROVED IN WRITING BY THE BOROUGH COUNCIL AND THESE WORKS SHALL BE CARRIED OUT AS APPROVED. THIS SCHEME SHALL INCLUDE INDICATIONS OF ALL HARD SURFACES, WALLS, FENCES, ACCESS FEATURES, THE EXISTING TREES AND HEDGES TO BE RETAINED, TOGETHER WITH THE NEW PLANTING TO BE CARRIED OUT, AND DETAILS OF THE MEASURES TO BE TAKEN TO PROTECT EXISTING FEATURES DURING THE CONSTRUCTION OF THE DEVELOPMENT.

Reason: To preserve and enhance the visual amenities of the locality in accordance with Policy DM6 of the Elmbridge Development Management Plan 2015.

7 LANDSCAPING - IMPLEMENTATION
ALL HARD AND SOFT LANDSCAPING WORKS SHALL BE CARRIED OUT IN ACCORDANCE WITH THE APPROVED DETAILS. ARBORICULTURAL WORK TO EXISTING TREES SHALL BE CARRIED OUT PRIOR TO THE COMMENCEMENT OF ANY OTHER DEVELOPMENT, OTHERWISE ALL REMAINING LANDSCAPING WORK AND NEW PLANTING SHALL BE CARRIED OUT PRIOR TO THE OCCUPATION OF ANY PART OF THE DEVELOPMENT OR IN ACCORDANCE TO THE TIMETABLE AGREED WITH THE BOROUGH COUNCIL. ANY TREES OR PLANTS, WHICH WITHIN A PERIOD OF FIVE YEARS OF THE COMMENCEMENT OF ANY WORKS IN PURSUANCE OF THE DEVELOPMENT DIE, ARE REMOVED, OR BECOME SERIOUSLY DAMAGED OR DISEASED, SHALL BE REPLACED AS SOON AS PRACTICABLE WITH OTHERS OF SIMILAR SIZE AND SPECIES, FOLLOWING CONSULTATION WITH THE BOROUGH COUNCIL, UNLESS THE BOROUGH COUNCIL GIVES WRITTEN CONSENT TO ANY VARIATION.

Reason: To preserve and enhance the visual amenities of the locality in accordance with Policy DM6 of the Elmbridge Development Management Plan 2015.

8 LANDSCAPING - TREE PLANTING AND AFTERCARE
No works or development shall take place until full details of proposed tree planting to mitigate for the loss of previous on-site trees, the proposed times of planting, and arrangements for aftercare over a period of 5 years have been approved in writing by the Borough Council. All tree planting and aftercare shall be carried out in accordance with those details and at those times. If within a period of five years from the date of the planting of any tree, that tree, or any planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted in the same place, unless the Borough Council gives its written consent to any variation.
9 **TREE PROTECTION AND PRE-COMMENCEMENT INSPECTION**

**BEFORE DEVELOPMENT TAKES PLACE TREE PROTECTION MEASURES SHALL BE INSTALLED AND ANY FURTHER INFORMATION PROVIDED IN ACCORDANCE WITH THE SUBMITTED ARBORICULTURAL INFORMATION. THE APPLICANT SHALL ARRANGE A PRE-COMMENCEMENT MEETING AFTER THE INSTALLATION OF THE TREE PROTECTION BETWEEN THE BOROUGH COUNCIL AND THE APPLICANT'S PROJECT ARBORICULTURIST TO ALLOW INSPECTION AND VERIFICATION OF THE PROTECTION MEASURES.**

**Reason:** This permission is granted on the basis that the trees would remain on site to mitigate the impact of the development and to preserve and enhance the visual amenities of the locality in accordance with Policy DM6 of the Elmbridge Development Management Plan 2015. It is considered necessary for this to be a pre-commencement condition because the demolition and construction works could have implications for the future health and amenity of retained trees within the site.

10 **TREE PROTECTION**

In this condition “retained tree” means an existing tree, which is to be retained in accordance with the approved plans and particulars; and paragraphs (a) and (b) below shall have effect until the expiration of 5 years from the first occupation of the development.

a) no retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned other than in accordance with the approved plans and particulars, without the written approval of the Borough Council. Any pruning shall be carried out in accordance with British Standard 3998 (tree work) and in accordance with any supplied arboricultural method statement.

b) if any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Borough Council.

c) tree protection shall be maintained in-situ and not moved or removed until all construction has finished and equipment, materials, or machinery are removed from site.

d) any arboricultural protection information and plans submitted as part of the application, and listed in the approved plans condition, or submitted to meet a condition of consent shall be implemented and adhered to at all times during the construction process unless otherwise agreed in writing with the Borough Council. This shall include any requirement for arboricultural supervision and site monitoring. This condition may only fully be discharged on completion of the development subject to satisfactory written evidence of contemporaneous supervision and monitoring of tree protection throughout construction by the appointed arboriculturist.

**Reason:** This permission is only granted on the basis that the trees would remain on site to mitigate the impact of the development and to preserve and enhance the visual amenities of the locality in accordance with Policy DM6 of the Elmbridge Development Management Plan 2015.

11 **BIODIVERSITY MITIGATION**

The development shall be carried out in accordance with the conclusions and recommendations in the Ecological Report by Southern Ecological Solutions dated June 2017.

**Reason:** In the interest of preserving and enhancing protected species and biodiversity in compliance with Policy DM21 of the Elmbridge Development Management Plan 2016 and the NPPF 2012.
Informatives

1 NEW VEHICLE Crossovers AND Dropped KerBS
The permission hereby granted shall not be construed as authority to carry out any works on
the highway. The applicant is advised that prior approval must be obtained from the Highway
Authority before any works are carried out on any footway, footpath, carriageway, or verge to
form a vehicle crossover or to install dropped kerbs. Please see
www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehicle-crossovers-or-
dropped-kerbs.

2 HIGHWAY MATERIALS
The developer is reminded that it is an offence to allow materials to be carried from the site
and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles.
The Highway Authority will seek, wherever possible, to recover any expenses incurred in
cleaning, clearing, repairing, or reconstructing highway surfaces and prosecutes persistent offenders.
(Highways Act 1980 Sections 131, 148, 149).

3 LAMP COLUMN
We need to inform the applicant regarding the need to move the lamp column which may
conflict with the location of the proposed new access. Any highway furniture needs to be
relocated at the applicant expense. Please contact surreylightingservices@skanska.co.uk
regarding the lamp column.

4 COMMUNITY INFRASTRUCTURE LEVY
The development permitted is subject to a Community Infrastructure Levy (CIL) liability for
which a Liability Notice will be issued as soon as practical after the day on which planning
permission first permits development. To avoid breaching the CIL regulations and the potential
financial penalties involved, it is essential a prior commencement notice be submitted. A blank
commencement notice can be downloaded from
For the avoidance of doubt commencement of demolition of existing structure(s) covering any
part of the footprint of the proposed structure(s) would be considered as commencement for
the purpose of the CIL regulations.