## 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 and documents:

MA212 350 Rev P4 Existing and Proposed Street Scenes

MA212 351 Rev P1 Proposed Street Scenes

MA212 352 Rev P3 Front Building - Proposed Inner Courtyard Streetscene

MA212 353 Rev P2 Rear Building - Proposed Front Street Scene

MA212 354 Rev P1 Rear Building - Proposed Rear Street Scene

MA212 370 Rev P1 Front Building - Proposed Elevations

MA212 371 Rev P1 Rear Building - Proposed Elevations

Received on 19/12/2022

MA212 001 Rev P3 Location Plan and Block Plan

Received on 19/01/2023

MA212 360 Rev P2 Proposed Side Elevation and Section A-A

MA212 361 Rev P2 Proposed Side Elevation and Section B-B

received on 05/07/2023 and

MA212 230 Rev P6 Proposed Site Plan

MA212 231 Rev P6 Proposed Site Context Plan

MA212 250 Rev P10 Proposed Site Basement Plan

MA212 251 Rev P10 Proposed Site Lower Ground Floor Plan

MA212 252 Rev P11 Proposed Site Ground Floor Plan

MA212 253 Rev P9 Proposed Site First Floor Plan

MA212 254 Rev P9 Proposed Site Second Floor Plan

MA212 255 Rev P10 Proposed Site Roof Plan

MA212 400 Rev P2 Front Building - Proposed Floor Plans

MA212 410 Rev P2 Rear Building - Proposed Floor Plans

MA212 260 Rev P3 Proposed Bin and Bike Store Plans

Received on 19/10/2023.

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

# 3. Materials - approved

The development shall not be erected other than in the following materials;

Brickwork - heritage stock facing brick - yellow buff tone

Render - Through- colour off-white ashlar render

Windows - Timber double glazed vertical sliding sash window

Stone detailing- Wetcast reconstituted stone banding

Roof - Slate roof tiles

Dormers - Dark Grey GRP dormer with profiled fascia to be located as per the approved elevation plans or such other materials as have been approved in writing by the borough council

Reason: To ensure that a satisfactory external appearance is achieved of the development in accordance with policy DM2 of the Elmbridge Development Management Plan.

#### 4. Obscure glazing

Prior to the first occupation of the development hereby permitted the side facing windows on the southwest and northeast elevations of the development hereby permitted shall be glazed with obscure glass that accords with level three obscurity as shown on the pilkington textured glass privacy levels (other glass suppliers are available) and only openable above a height of 1.7m above the internal floor level of the room to which it serves. The window shall be permanently retained in that condition thereafter.

Reason: To preserve the reasonable privacy of neighbouring residents in accordance with policy DM2 of the Elmbridge Development Management Plan.

#### 5. Flat roof - no other use

The flat roof to the development hereby permitted shall not at any time be altered or adapted to form a balcony, roof garden or similar amenity area without the grant of a further specific permission from the borough council. Reason: To prevent undue loss of privacy to adjacent properties contrary to policy DM2 of the Elmbridge Development Management Plan and the Elmbridge Design and Character Supplementary Planning Document.

## 6. Obscure balcony screen details

Prior to the first occupation of the development hereby permitted details shall be submitted to and agreed by the Local Planning Authority for an obscure glass screen at 1.8m minimum from relevant floor level that accords with level three obscurity as shown on the Pilkington textured glass privacy levels (or similar) on the southwest edge of the balconies nearest the southwest elevation and on the northeast edge of the balconies nearest the northeastern elevation. The screens shall installed prior to occupation and be permanently maintained in that condition thereafter.

Reason: To preserve the privacy of neighbouring residents in accordance with policy DM2 of the Elmbridge Development Management Plan.

## 7. Landscaping scheme

Prior to first occupation [being brought into use] written details and plans of the following landscaping works shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved. This scheme shall include:

- a) positions, height, species, design, materials and type of boundary treatment(s)
- b) hard surfacing materials

Development shall be carried out in accordance with the approved details and shall be maintained.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.

#### 8. New access

No part of the development shall be first occupied unless and until the proposed vehicular access to the site has been constructed and provided with visibility zones in accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.

Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).

## 9. Closure of existing access

The development hereby approved shall not be first occupied unless and until existing accesses from the site to Oatlands Drive have been permanently closed and any kerbs, verge, footway, fully reinstated.

Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).

## 10. 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
- (d) programme of works (including measures for traffic management)
- (e) provision of boundary hoarding behind any visibility zones
- (f) measures to prevent the deposit of materials on the highway
- (g) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- (h) on-site turning for construction vehicles

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 condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).

#### 11. Electric vehicle charging

The development hereby approved shall not be occupied unless and until each of the proposed parking spaces are provided with a fast charge socket (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).

#### 12. Parking and turning areas

The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles and cycles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. All cycle parking shall be secure, covered and lit. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.

Reason: The condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in order to meet the objectives of the NPPF, and to satisfy policy CS25 of the Elmbridge Core Strategy (2011), and policy DM7 of the Elmbridge Development Management Plan (2015).

# 13. Programme of Archaeological Work

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.

Reason: The site lies in an area of archaeological potential, particularly for, but not limited to, Prehistoric and Medieval remains. The potential impacts of the development can be mitigated through a programme of archaeological work. This is in accordance with Policy DM12 of the Development Management Plan 2015 and the NPPF.

## 14. Tree Pre-commencement Meeting (With tree protection)

No development including groundworks and demolition shall take place and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist, representative from the Local Planning Authority and the site manager/foreman. The site visit is required to ensure operatives are aware of the agreed working procedures and the precise position of the approved tree protection measures that remain installed in accordance with the approved tree protection plan(s) until all development works are finished and building materials have been

#### removed

CONSULTANT: KEEN/SITE: 16-18 Oatlands Drive Weybridge Surrey KT13 9JL/TPP: 2044-KC-XX-YTREE-TPP01RevA/DATE: 2022

To arrange a pre-commencement meeting please email

cspringett@elmbridge.gov.uk with the application reference and contact details.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, DM6 of the Councils Core Strategy 2011 and Development Management Plan 2015. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

15. Tree Protection Measures (With Pre-Commencement Meeting)
After the agreed tree protection measures (BS5837 2012 fig.2) have been installed in accordance with the tree protection footprint on approved plans, all tree protection measures shall be maintained for the course of the development works. The development thereafter shall be implemented in strict accordance with the approved details and method statements contained in CONSULTANT: KEEN/SITE: 16-18 Oatlands Drive Weybridge Surrey KT13 9JL/REPORT: 2044?KC?XX?YTREE/DATE: 2022

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14 of the Councils Core Strategy 2011 and Policy DM6 of the Development Management Plan 2015.

## 16. Site Supervision

The completion schedule/report of all the agreed arboricultural site supervision and monitoring as approved in the arboricultural information CONSULTANT: KEEN/SITE: 16-18 Oatlands Drive Weybridge Surrey KT13 9JL/REPORT: 2044?KC?XX?YTREE SECTION 6.4/DATE: 2022 shall be submitted to and approved in writing by the Local Planning Authority within 20 working days of the substantial completion of the development hereby approved. This shall include evidence of compliance through supervision and monitoring of the agreed activities by a suitably qualified arboriculturist.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policy CS14 of the Core Strategy 2011 and Policy DM6 of the Development Management Plan 2015.

## 17. Tree Retention

All existing trees, hedges or hedgerows inside the identified site boundary shall be retained, unless shown on the approved drawings as being removed and paragraphs (a) and (b) below shall have effect until the expiration of 5

years from the first occupation of the proposed development.

No retained tree, hedge or hedgerow providing a screen shall be cut down, uprooted or destroyed, other than in accordance with the approved plans and particulars.

If any retained tree, hedge or hedgerow is removed, uprooted or destroyed or dies, another tree, hedge or hedgerow of similar size and species shall be planted at the same place, in the next available planting season or sooner. Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, CS15, of the Core Strategy 2011 and DM6 of the Development Management Plan 2015.

# 18. Tree Planting & Maintenance.

No development including groundworks and demolition shall take place until full details of all proposed tree planting are submitted to and approved in writing by the Local Planning Authority. Serious consideration needs to given to a significant landscaping scheme that may require engineering solutions in order to work with the amount of hard standing required for parking. More emphasis is required on landscaping to the front of site, consideration should be given to removing low grade trees in order to enhance visual quality with significant replacements. All new planting areas should be protected during construction shown on the tree protection plan.

Details are to include.

- " species, sizes, locations, planting pit design / engineering, supports, and guards or other protective measures to be used.
- " planting times and maintenance schedules for aftercare to ensure good establishment.
- " size of the site and anticipated area for new planting, the Council expects a minimum of 30x heavy standard semi mature trees that will be significant at maturity and thrive in their given locations (engineered planting pits may be required for certain areas) to be planted to maintain future arboricultural amenity.

All tree planting will be carried out in accordance with BS 8545:2014 prior to the occupation of any part of the development.

If within a period of 5 years from the date of the planting of any tree, that tree, or any planted in replacement for it, is removed, uprooted, destroyed, or dies, another tree of same size and species shall be planted at the same place.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, CS15, of the Councils Core

Strategy 2011 and DM6 of the Councils Development Management.

#### 19. Sensitive Lighting Management Plan

Prior to the commencement of the works, a Sensitive Lighting Management

Plan shall be submitted to and approved by the Local Planning Authority. The Sensitive Lighting Management Plan shall be written in accordance with the recommendations of the Bat Conservation Trust's document entitled "Bats and Lighting in the UK - Bats and The Built Environment Series". The proposed development shall be carried out in accordance with the approved details and thereafter maintained.

Reason: To ensure that the proposed development does not cause harm to protected species in accordance with the Wildlife and Courtside Act 1981 and policy CS15 of the Elmbridge Core Strategy 2011.

#### 20. Landscape and Ecological Management Plan (LEMP)

A detailed Landscape and Ecological Management Plan should be submitted to and approved in writing by the Local Planning prior to the commencement of development. The LEMP should include details of proposed impact avoidance and mitigation for the protected species. In addition, the LEMP should include details of enhancement measures and adequate details of the following:

- a) Description and evaluation of ecological features to be managed and created
- b) Specifications, number and location of proposed ecological features, where appropriate
- c) Aims and objectives of management
- d) Appropriate management options to achieve aims and objectives
- e) Prescriptions for management actions
- f) Preparation of a work schedule for securing biodiversity enhancements in perpetuity
- g) Details of the body or organisation responsible for implementation of the LEMP
- h) Ongoing monitoring and remedial measures.
- i) Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery.
- j) Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.
- k) Recommended enhancements, including those for bats, birds, hedgehogs, grass snakes, reptiles and stag beetle to be included within the final design
- I) Methods to eradicate/ prevent the spread of Schedule 9 invasive plant species, particularly Indian balsam, as set out in the Wildlife and Countryside Act 1981 (as amended).
- m) Details and confirmation of the biodiversity net gain, identified in the AAE document dated 14/06/2023 titled Technical Note: Biodiversity Net Gain Assessment, received on 27/09/2023, to be secured.

The approved details shall be implemented in full to the satisfaction of the LPA prior to the first occupation of the development and maintained as agreed. Reason: To ensure that the development does not result in any adverse impact upon protected species or biodiversity in accordance with Policy CS15

of the Core Strategy 2011, Policy DM21 of the Development Management Plan 2015 and the National Planning Policy Framework 2023.

#### 21. Construction Environmental Management Plan (CEMP)

The development herby permitted shall not commence, including any demolition until a CEMP has been submitted and approved in writing by the Local Authority.

The CEMP should include, but not be limited to:

- a. Map showing the location of the ecological features, specifically the watercourse.
- b. Risk assessment of the potentially damaging construction activities.
- c. Practical measures to avoid and reduce impacts during construction.
- d. Location and timing of works to avoid harm to biodiversity features.
- e. Responsible persons and lines of communication.
- f. Use of protected fences, exclusion barriers and warning signs where necessary.
- g. Ensure precautionary measures are followed during demolition, site clearance, and tree removal, to avoid harm to terrestrial mammals, bat species and reptiles
- h. Methods to eradicate/ prevent the spread of Schedule 9 invasive plant species as set out in the Wildlife and Countryside Act 1981 (as amended).
- i. Details of ecologist supervision during demolition and site clearance
- j. Detailed protection measures for HPI woodland

The CEMP must additionally incorporate the recommendations for bats, birds, other

species and invasive species. The development must be carried out in accordance with the approved detail.

Reason: To ensure that the development does not result in any adverse impact upon protected species or biodiversity in accordance with Policy CS15 of the Core Strategy 2011, Policy DM21 of the Development Management Plan 2015 and the National Planning Policy Framework 2023.

#### 22. Biodiversity mitigation

The development shall be carried out in accordance with the conclusions and recommendations by AAe Environmental including all biodiversity enhancements in their reports and letters received on 27/06/2023 and 19/12/2022.

Reason: In the interest of preserving and enhancing protected species and biodiversity in compliance with policy DM21 of the Elmbridge Development Management Plan and the National Planning Policy Framework.

## 23. SUDS Design

The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national NonStatutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
- b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off.
- c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
- e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.

#### 24. SUDS Verification Report

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is designed to the National Non Statutory Technical Standards for SuDS.

#### 25. Flood Risk Assessment Implementation

The development shall be carried out in accordance with the submitted flood risk assessment (ref 221584/FRA/MK/RS/01) and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 11.925 metres above Ordnance Datum (AOD).
- There shall be no built development within the 1% annual exceedance probability plus 47% climate change flood extent in accordance with Drawings

MA212 360 Rev P2 Proposed Side Elevation and Section A-A MA212 361 Rev P2 Proposed Side Elevation and Section B-B

and

#### MA212 230 Rev P6 Proposed Site Plan.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: This condition is in accordance with paragraph 167 of the NPPF and seeks to reduce the risk of flooding to the proposed development and future occupants.

#### 26. Secured by Design

Prior to the first occupation of development, a full and detailed application for the Secured by Design award scheme shall be submitted to and approved in writing by the local planning authority in consultation with the Surrey Police Designing Out Crime Officers, setting out how the principles and practices of the Secured by Design Scheme are to be incorporated. The development shall be carried out in accordance with the agreed details.

Reason: To ensure the safety of the public and occupants of the proposed development in accordance with the NPPF.

#### **Informatives**

#### 1 SUDS

If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent.

More details are available on our website.

premises are nearby it is advised that:

If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.

Sub ground structures should be designed so they do not have an adverse effect on groundwater.

#### 2 Water Efficiency

Developers are encouraged to construct any new dwelling to meet as a minimum the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day using the fittings approach. The site is in an area of serious water stress requiring water efficiency opportunities to be maximised; to mitigate the impacts of climate change; in the interests of sustainability; and to use natural resources prudently in accordance with the NPPF. Thames Water offer environmental discounts for water efficient development which reduce the connection charges for new residential properties. Further information on these discounts can be found at: <a href="https://www.thameswater.co.uk/developers/charges">https://www.thameswater.co.uk/developers/charges</a>

# 3 Construction phase only - Noise and Pollution To control noise and pollution during the construction phase where sensitive

- (a) Work which is audible beyond the site boundary should only be carried out between the following hours: Monday to Friday 08:00 hrs to 18:00 hrs Saturday 08:00 hrs to 13:00 hrs and not at all on Sundays or Bank Holidays.
- (b) The quietest available items of plant and machinery should be used on site. Where permanently sited equipment such as generators are necessary, they should be enclosed to reduce noise levels.
- (c) Deliveries and collections should only be received within the hours detailed above.
- (d) Adequate steps should be taken to prevent dust causing nuisance beyond the site boundary. These could include the use of hoses to damp down stockpiles of materials which are likely to generate airborne dust, to damp down during stone/slab cutting; and the use of bowsers and wheel washes.
- (e) There should be no burning on site that causes nuisance to local residents.
- (f) Only minimal security lighting shall be used outside the hours stated above.

#### 4 Highways Informatives

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-andtransport/road-permits-and-licences/vehicle-crossovers-or-droppe d-kerbs.

#### Other Works to the Highway

The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see http://www.surreycc.gov.uk/roads-andtransport/roadpermits-and-licences/the-traffic-management -permit-scheme. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/peopleand community/emergency-planning-and-community-safety/flooding advice. Closure and reinstatement of existing accesses/footway When a temporary access is approved or an access is to be closed as a condition of planning permission an agreement with, or licence issued by, the Highway Authority Local Highways Service will require that the redundant dropped kerb be raised and any verge or footway crossing be reinstated to

conform with the existing adjoining surfaces at the developers expense.

It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to:

http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicleinfrastructure.html for guidance and further information on charging modes and connector types.

Section 278 Agreement

A Section 278 Agreement under the Highways Act 1980 will be required to provide the necessary vehicular access to the site and this may require additional works, such as Keep Clear' markings or other works in order to tie in to the current Section 278 scheme for the development at 8-14 Oatlands Drive.

# 6 Community Infrastructure Levy (CIL)

The development permitted is subject to a 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. The notice is available at planningportal.co.uk/cil

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.