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Saba Hadi
Richmond Upon Thames London Borough
Council
Environment Directorate
The Civic Centre
44 York Street
Twickenham
Middx
TW1 3BZ
15 December 2020

Your Ref: 20/1205/FUL
Our Ref: APP/L5810/W/20/3256715

Dear Saba Hadi,

Town and Country Planning Act 1990
Appeal by Mr Sammy Mak
Site Address: The Four Regions Chinese Restaurant, 102-104 Kew Road,
RICHMOND, TW9 2PQ

I enclose for your information a copy of the appellant's final comments on the above appeal(s). Normally, no further comments, from any party, will now be taken into consideration.

Yours sincerely,

Safia Kausar
Safia Kausar

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Planning Appeal ref. 3256715 (102 Kew Rd) Appellant's response to LPA statement

I confirm receipt of the LPA statement dated 1st December 2020 and comment as annotated below.

The Conservation Officer states (page 3 of LPA response)

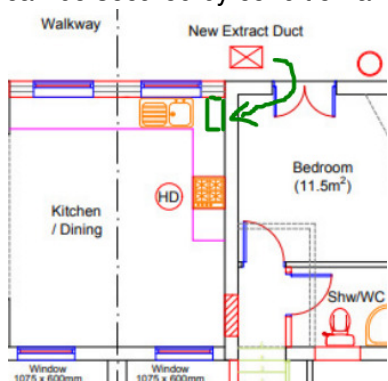
“... and would diminish the rhythm and visual appearance of the rear elevations of these buildings which can be seen from nearby residential properties. The ducting would also become more visually prominent. (see note 1) The resulting harm would be less than substantial as per para 196 of the NPPF which would require a public benefit to outweigh such harm.

The benefit arising from the additional floorspace to the quality of accommodation is given limited weight as a public benefit and does not outweigh the harm to the designated and non-designated heritage asset. (see note 2)

Despite the appellants assertions that the views of the rear elevation may be more limited from the public realm than the front elevation, it would be clearly visible (see note 3) from two sides and the rear and that is not to say, of course, that limited views means the detailing of proposals should be considered more leniently, but that the impact upon the appearance of an area may be more limited.

....that would result in an overly bulky development that would significantly erode the rhythm (see note 4) and visual appearance of the rear elevation and that would result in less than substantial harm to the BTM and Conservation Area

1. The new duct location is the same location as in the approved scheme. See images 14/15 in my statement. So it's no worse than the as agreed scheme (see para. 1.3 of my statement) and in accordance with policy LP1 as shown in Appendix 2 of initial statement. It would be possible to relocate the duct inside the building if considered necessary. This can be secured by condition and would be an improvement on the agreed scheme.



2. I note the important last part of Framework para.196 was missed out i.e. “public benefits ...including .. securing optimum viable use.” The benefits of this scheme are indicated in my initial statement (paras 3.11-3.13) and include energy efficiency. The LB Richmond declared a “climate emergency” in July 2019 and their amended strategy on 13/01/2020 sought various improvements including:
 - c) adopt a licensing scheme for private landlords, similar to the scheme in Newham, which includes standards on energy efficiency;
 - d) provide home energy visits and advice on energy efficiency to both homeowners and businesses;The energy efficiency of this infill would be in line with this strategy.

- 3 I dispute the words “clearly seen” as noted in my statement and invite the inspector to look for suitable clear viewpoints. Our expert heritage consultant (Andrew Passmore) in para. 5.11 of his heritage statement clearly considers that the “.. glimpsed views.... are not considered to contribute to the special interest of the Conservation Area”. Similarly, given the position of the building on the CA boundary, the LPA has not identified the CA’s setting or views into the CA from its setting as contributing towards its special interest. The LPA’s CA documentation does not state that the ‘rhythm and visual appearance’ of the rear of the terrace contributes towards the special interest of the CA.
- 4 Rhythm in architecture requires significant repetition. My image 9 (reproduced below) shows that although there are three indents in this whole block the outrider elements are not the same. In addition I note the presence of existing infills at ground and basement levels between the outriggers, and in some instances beyond the outriggers. I suggest that the reality on site does not depict the sense of ‘rhythm and visual appearance’ the LPA seeks to protect.



(copy of image 9 from my appeal statement)

Chris Dent ARB MRTPI 9th December 2020

I confirm receipt of the comments from Flat 3, 147 Kew Road and comment as follows.

I am sorry to hear of the neighbour's objections. I believe the flat in question is above "El Fenoon" which is on the corner opposite the front of the appeal building.

I note that the principle of altering the type of accommodation is accepted by the local planning authority and neither this nor the perceived issue of parking stress is part of refusal reason. The velux windows in the front elevation will be exactly the same as the previously approved scheme. The neighbour needs reassurance that the view from velux windows is by nature less obvious than from the existing large windows in this elevation and the foliage from the street trees provides significant seasonal screening.



(proposed front elevation, photos from Google streetview)



Chris Dent ARB MRTPI 9th December 2020