

## Application reference: 21/2067/HOT WEST TWICKENHAM WARD

Date application received	Date made valid	Target report date	8 Week date
08.06.2021	07.07.2021	01.09.2021	01.09.2021

**Site:**

14 Trafalgar Road, Twickenham, TW2 5EJ,

**Proposal:**

Renovation of boundary wall and installation of iron fence and gate to facilitate new vehicular access. Removal of tree and creation of permeable hard standing.

Status: Pending Decision (If status = HOLD please check that all is OK before you proceed any further with this application)

**APPLICANT NAME**

Ms Rogers  
14, Trafalgar Road  
Twickenham  
TW2 5EJ

**AGENT NAME**

Mr Riccardo Fabrizio  
Studio CA23 @ Second Floor  
S&A  
Casting House  
Moulding Lane  
Deptford  
SE14 6BN  
London

**DC Site Notice:** printed on 08.07.2021 and posted on 16.07.2021 and due to expire on 06.08.2021

**Consultations:**

**Internal/External:**

**Consultee**

14D Urban D  
LBRUT Transport  
LBRuT Trees Preservation Officer (North)

**Expiry Date**

22.07.2021  
22.07.2021  
22.07.2021

**Neighbours:**

5 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021  
27 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021  
4 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021  
13 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021  
19 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021  
17 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021  
15 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021  
14 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
13 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
12 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
11 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
10 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
9 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
2 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
1 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
8 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
7 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
6 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
5 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
4 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
3 Air Sea Mews, Twickenham, TW2 5FN, - 08.07.2021  
16 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021

12 Trafalgar Road, Twickenham, TW2 5EJ, - 08.07.2021

**History: Development Management, Appeals, Building Control, Enforcements:**Development Management

Status: GTD Application:00/T1224  
Date:08/09/2000 Yew - Trim And Shape To Previous Points

Development Management

Status: GTD Application:01/T0350  
Date:19/04/2001 Horse Chestnut - Shorten Right Hand Laterals By 2-3m To Balance Crown And Shorten Limb Over Rear By 3-4m, Shorten Lateral Over Lawn By 2-3m

Development Management

Status: GTD Application:02/T1490  
Date:03/10/2002 Yew - Trim And Shape To Original Shape

Development Management

Status: GTD Application:04/T0127  
Date:26/02/2004 Silver Birch (betula Pendula) - Remove Hanging Broken Branch And Tidy The Stump.

Development Management

Status: GTD Application:98/T1087  
Date:04/09/1998 Yew - Trim All Over

Development Management

Status: REF Application:14/0262/HOT  
Date:25/03/2014 Proposed single storey rear extension.

Development Management

Status: REF Application:14/1498/HOT  
Date:27/08/2014 Erection of a single storey rear extension.

Development Management

Status: GTD Application:15/1027/HOT  
Date:21/05/2015 Proposed single storey rear extension.

Development Management

Status: REF Application:20/2865/HOT  
Date:10/12/2020 Creation of pedestrian and vehicular access and permeable hardstanding area for car parking. Alteration to front boundary wall to increase visibility and installation of new iron fence and gate.

Development Management

Status: REF Application:20/3777/HOT  
Date:24/02/2021 Creation of pedestrian and vehicular access and permeable hardstanding area for car parking. Alteration to front boundary wall to increase visibility and installation of new iron fence and gate. Removal of 2 trees.

Development Management

Status: PDE Application:21/2067/HOT  
Date: Renovation of boundary wall and installation of iron fence and gate to facilitate new vehicular access. Removal of tree and creation of permeable hard standing.

Appeal

Validation Date: 15.10.2014 Erection of a single storey rear extension.  
Reference: 14/0156/AP/REF

Building Control

Deposit Date: 21.05.2007 Special installation (electric floor/ ceiling heating garden lighting/ power ELV lighting generator) One or more new circuits Dwelling house Detached shed garage or greenhouse

Reference: 07/72851/NICEIC

Building Control

Deposit Date: 29.05.2007 Dwelling house New installation rewire or partial rewire

Reference: 07/72862/NICEIC

Building Control

Deposit Date: 24.01.2012 Internal modifications.

Reference: 12/0138/IN

Building Control

Deposit Date: 20.02.2012 Circuit alteration or addition in kitchen/ special location ELV lighting within

the building

Reference: 12/NIC00793/NICEIC

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Building Control

Deposit Date: 05.05.2015      Single storey rear extension. The work excludes any gas work subject to the gas safety (Installation and Use) Regulations 1998 and electrical work notifiable under the Building Regulation 12(6A).

Reference: 15/1010/IN

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Building Control

Deposit Date: 29.10.2015      Circuit alteration or addition in a special location Install one or more new circuits

Reference: 15/NIC02642/NICEIC

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Building Control

Deposit Date: 22.12.2016      Install one or more new circuits

Reference: 16/NIC02544/NICEIC

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**Recommendation:**

The determination of this application falls within the scope of Officer delegated powers - YES

**I therefore recommend the following:**

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

This application is CIL liable  YES\*  NO  
 (\*If yes, complete CIL tab in Uniform)

This application requires a Legal Agreement  YES\*  NO  
 (\*If yes, complete Development Condition Monitoring in Uniform)

This application has representations online (which are not on the file)  YES  NO

This application has representations on file  YES  NO

Case Officer (Initials): JSI

Dated: 11/08/2021

**I agree the recommendation:**

Team Leader/Head of Development Management/Principal Planner

Dated: .....

This application has been subject to representations that are contrary to the officer recommendation. The Head of Development Management has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

Head of Development Management: .....RDA.....

Dated: .....12/08/21.....

<b>REASONS:</b>
<b>CONDITIONS:</b>
<b>INFORMATIVES:</b>
<b>UDP POLICIES:</b>
<b>OTHER POLICIES:</b>

The following table will populate as a quick check by running the template once items have been entered into Uniform

**SUMMARY OF CONDITIONS AND INFORMATIVES**

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**CONDITIONS**

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**INFORMATIVES**

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U0053599	NPPF Refusal - paras 38-42
U0053600	Decision drawings

**Application reference:** 20/2067/HOT  
**Site address:** 14 Trafalgar Road, Twickenham, TW2 5EJ

**Proposal:**

The application seeks planning permission for: *'Renovation of boundary wall and installation of iron fence and gate to facilitate new vehicular access. Removal of tree and creation of permeable hard standing.'*

The application follows the refusal of two similar schemes under planning application refs: 20/2865/HOT refused on 10/12/2020 and 20/3777/HOT refused on 24/02/2021.

The application differs from the most recent refused scheme in the following key ways:

- Removal of one tree (the previous scheme proposed the removal of two trees)
- Revised tree survey and landscaping plan

**Site description:**

The application site comprises a two-storey semi-detached dwelling located on the eastern side of Trafalgar Road, West Twickenham ward. The property is a locally-listed Building of Townscape Merit (BTM), as are most of the dwellings on Trafalgar Road. The site is located in CA10 Trafalgar Road Twickenham Conservation Area. There are no statutorily listed buildings to consider.

The application property is a Georgian dwelling set back from the road via a deep front garden and separated by a low brick boundary wall and wooden gate allowing pedestrian access to the front garden. There is currently no vehicular access to the front garden, where there are a number of high quality trees and an abundance of greenery.

An Article 4 Direction introduced in 2018 restricts basement development and an Article 4 Direction implemented in 1982 removes permitted development rights for alterations to and rebuilding of garden walls and gates, as well as all works listed below:

- a) All side extensions and garages regardless of size.
- b) Change of materials to roofs and walls including rendering and painting existing brickwork of any facade.
- c) Alteration to roofs including the addition of roof dormers or roof lights and any change to the roof pitch.
- d) Alteration to fenestration, in particular removal, addition or substitution of windows and doors.
- e) Alteration to decorative details such as mouldings, architraves, plinth, string courses and glazing bars.
- f) Changes to minor elements such as removal of chimney stacks; removal, alteration or addition of balconies, porches and canopies.
- g) Alterations to and rebuilding of garden walls fences and gates.

The site is in Flood Zone 1 though there are a number of flooding designations: Area Susceptible to Groundwater Flooding (< = 50% < 75%), Critical Drainage Area, Throughflow Catchment Area.

The site has a Land Use Past Industrial Designation.

As well as Trafalgar Road Twickenham Conservation Area, the site also sits in Area 7 & Conservation Area 10 (Trafalgar Road) of the Twickenham Village Planning Guidance. The loss of front boundary treatments and front gardens for car parking is identified as a development threat in both documents, and the Village Planning Guidance also cites the ease of passage being hindered by cars parked on both sides of the road as a problem, as well as development pressure which may harm the balance of the landscape-dominated setting. The retention and

enhancement of front boundary treatments and discouragement of the increase in the amount of hard surfacing in front gardens is identified as an opportunity from development in both documents and the Village Planning Guidance also cites the improvement of highways conditions and pedestrian convenience. Further guidance is also set out in the Trafalgar Road Conservation Area Study.

The site has a Public Transport Accessibility Level (PTAL) of 3 which is considered 'moderate' on a scale of 0 to 6b with 0 being worst and 6b being best. There is no Controlled Parking Zone (CPZ) in operation.

**Relevant planning history:**

- 14/0262/HOT – Proposed single-storey rear extension. – Refused 25/03/2014

Reason(s) for refusal:

1. *The proposed development, by reason of its character, design and proportions, is not considered sympathetic or sufficiently subordinate to the parent building and results in an unsympathetic and overly dominant form of development which would be to the detriment of the character and appearance of the Building of Townscape Merit itself and the character and appearance of the Conservation Area. As such, the proposed development would not be in accordance with the aims and objectives of the Local Development Framework, in particular Core Strategy Policy CP76, Development Management Plan Policies DM HD1, DM HD3 and DM DC1, together with Council's Supplementary Planning Guidance for House Extensions & External Alterations', the Trafalgar Road Conservation Area Statement and the Trafalgar Road Conservation Area Study.*
- 14/1498/HOT – Erection of a single-storey rear extension. – Refused 27/08/2014 – Appeal Dismissed 01/12/2014

Reason(s) for refusal:

1. *The proposed development, by reason of its character, design and proportions, is not considered sympathetic or sufficiently subordinate to the parent building and results in an unsympathetic and overly dominant form of development which would be to the detriment of the character and appearance of the Building of Townscape Merit itself and the character and appearance of the Conservation Area. As such, the proposed development would not be in accordance with the aims and objectives of the Local Development Framework, in particular Core Strategy Policy CP76, Development Management Plan Policies DM HD1, DM HD3 and DM DC1, together with Council's Supplementary Planning Guidance for House Extensions & External Alterations', the Trafalgar Road Conservation Area Statement and the Trafalgar Road Conservation Area Study.*
- 15/1027/HOT – Proposed single-storey rear extension. – Approved 21/05/2015
  - 20/2865/HOT – Creation of pedestrian and vehicular access and permeable hardstanding area for car parking. Alterations to front boundary wall to increase visibility and installation of new iron fence and gate. – Refused 10/12/2020

Reason(s) for refusal:

1. *Visual amenity/trees – In the absence of a BS5837:2012 survey and Arboricultural Impact Assessment, inadequate information has been provided to demonstrate the satisfactory protection of site trees and provision of new landscaping and thereby would be detrimental to the visual amenities of the streetscene, the setting of the host Building of Townscape Merit and the character and appearance of the Trafalgar Road Conservation Area. As such, the application would fail to comply with the aims and outcomes sought within the NPPF*

(2019) and the Local Development Plan, in particular, Policies LP1, LP3, LP4 and LP16 of the Local Plan (2018) and the Council's supplementary planning guidance: Buildings of Townscape Merit SPD (May 2015), the Twickenham Village Planning Guidance SPD (June 2020) and the Trafalgar Road Conservation Area Statement and Study.

- 20/3777/HOT – Creation of pedestrian and vehicular access and permeable hardstanding area for car parking. Alteration to front boundary wall to increase visibility and installation of new iron fence and gate. Removal of 2 trees. – Refused 24/02/2021

Reason(s) for refusal:

1. *Visual amenity/trees – In the absence of a BS5837:2012 survey and Arboricultural Impact Assessment, inadequate information has been provided to demonstrate the satisfactory protection of site trees and provision of new landscaping and the application thereby would be detrimental to the visual amenities of the streetscene, the setting of the host Building of Townscape Merit and the character and appearance of the Trafalgar Road Conservation Area. As such, the application would fail to comply with the aims and outcomes sought within the NPPF (2019) and the Local Development Plan, in particular, Policies LP1, LP3, LP4 and LP16 of the Local Plan (2018) and the Council's supplementary planning guidance: Buildings of Townscape Merit SPD (May 2015), the Twickenham Village Planning Guidance SPD (June 2020) and the Trafalgar Road Conservation Area Statement and Study.*

There are also a number of planning applications relating to works to trees.

#### **Amendments:**

- Description of development amended to make clear that a new vehicular access is being proposed, and that the proposed works are to facilitate this.

This was not considered to materially change the scheme, the proposed works for which are clear from the submitted plans, and so neighbours were not reconsulted.

#### **Other matters:**

None.

#### **Public and other representations:**

##### Neighbour consultation

Three letters of support have been received from owners/occupiers of neighbouring properties. Below is summary of points raised:

##### *Character, design and heritage*

- In keeping with neighbour's design
- Appropriate for conservation area
- Improves streetscene

##### *Trees and landscaping*

- Existing trees of medium/low quality
- Holly trees of little importance owing to proliferation
- New trees can be appropriately planted

##### *Parking and highways*

- Allows for potential use of electric cars
- Off-street parking needed since CPZ introduced

#### **Internal consultees:**



- Transport– No objection
- Trees – Insufficient information to be able to support the application in its current form
- Urban Design – Objection

Internal colleagues' comments are incorporated into the main body of the assessment.

**Main Development Plan policies:**

**Local Plan (2018):**

- Policy LP1 Local Character and Design Quality
- Policy LP3 Designated Heritage Assets
- Policy LP4 Non-Designated Heritage Assets
- Policy LP15 Biodiversity
- Policy LP16 Trees, Woodlands and Landscape
- Policy LP20 Climate Change Adaption
- Policy LP21 Flood Risk and Sustainable Drainage
- Policy LP44 Sustainable Travel Choices
- Policy LP45 Parking Standards and Servicing

**Supplementary Planning Documents (SPDs) / Guidance (SPGs):**

- Buildings of Townscape Merit SPD (May 2015)
- Design Quality SPD (February 2006)
- House Extensions and External Alterations SPD (May 2015)
- Trafalgar Road Twickenham Conservation Area CA10 Statement
- Trafalgar Road Conservation Area Study
- Transport SPD (June 2020)
- Twickenham Village Planning Guidance SPD (January 2018)

**Other local planning guidance:**

- Strategic Flood risk Assessment (SFRA) – Level 1 Update (Updated 2020 with further minor updated March 2021)

**Professional comments:**

The main planning issues to be considered are:

- Design and heritage;
- Biodiversity and trees;
- Flood risk;
- Parking and highways safety.

**Design and Heritage**

The statutory duty in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention is paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

According to the NPPF, paras 199 to 208, great weight should be given to the conservation of designated assets when considering the impact of a proposed development on the significance of a designated heritage asset. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial, total loss or less than substantial harm to its significance. Para. 196 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Para. 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced

judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Policy LP1 of the Local Plan relates to local character and design quality. This states that new development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively to, its surroundings based on a thorough understanding of the site and its context.

Local Plan Policy LP3 relates to designated heritage assets. This states that the Council will require development to conserve and where possible take opportunities to make a positive contribution to, the historic environment of the borough.

Local Plan Policy LP4 relates to non-designated heritage assets. This states that the Council will seek to ensure and encourage the preservation and enhancement of BTMs and will use its powers where possible to protect their significance, character and setting.

Further guidance is provided in the Council's supplementary planning guidance on BTMs, Design Quality and House Extensions and External Alterations. Pertinent guidance regarding cross-overs is provided in the Council's Transport SPD. With regards to design, this states that Richmond Upon Thames is one of London's most attractive boroughs with many buildings being listed or located in conservation areas. High priority is places on the street-scene and preservation of the borough's character. The space between the road and the buildings fronting it is an important part of the environment, which can be seriously affected by the introduction of garden parking. This can be especially intrusive in front of or on the site of Listed Buildings, BTMs and in Conservation Areas. As traditional gardens are replaced by hard surfaces and vehicles, the harmony and continuity of the street frontage is interrupted, and enjoyment of the buildings themselves can suffer as well as resulting in a reduction of wildlife habitats and permeable surfaces. The provision of crossovers and garden parking also reduces the supply of communal street parking, which itself perpetuates a proliferation of front garden parking as street parking becomes more difficult. In limited cases where it would be acceptable, it is very important that off-street parking should be designed to cause minimum intrusion and harm. Fundamental to this is the use of materials which enhance rather than detract from the street scene and together with appropriate planting and landscaping, add to the visual experience of residents and visitors as well as enhancing the built and natural environment.

Turning to the application, No. 14 Trafalgar Road is one of a pair with No.16, which has a similar parking arrangement to that proposed for this application. The existing front boundary is at No. 14 is a mixture of low brick wall and fencing; the fencing element in particular is not considered to be a very positive feature of the streetscene.

The Conservation Area Statement highlights the issue of front garden parking, and encourages the retention and enhancement of front boundary treatments and discourages an increase in the amount of hard surfacing in front gardens. The Village Planning Guidance for the area cites that the removal of hedges or shrubs, and the introduction of unsympathetic paving materials and enlarging of paved areas, will threaten the appearance of the area.

In this instance, the adjoining house at No. 16 has a similar parking arrangement, and other houses nearby on this side of the road also have vehicle access. Whilst precedence of existing arrangements in itself is not an automatic guarantee of approval, in this case it is considered that the proposals would not result in disruption to the streetscene, and subject to an appropriate and sensitive design, could in principal be supported.

The proposals for the front boundary treatment are considered to be a definite improvement to the existing design and have the potential to protect the character and appearance of the BTM and

streetscene. The existing piers are to be retained in the existing positions, and officers have no issues with the proposals for the front boundary. Proposed materials are considered acceptable.

Whilst it is noted that the scheme has been revised to include the loss of one tree rather than the previously proposed two trees, there remain concerns about the justification for the loss of the tree and the insufficient information regarding replacement planting, in order to preserve the character of the area. This is discussed in further detail in the 'Trees and Landscaping' section below. The Council's Urban Design officer has been consulted on the application and confirms that the proposal is unsupportable at this stage on that basis.

Further, the proposed paving for the hard standing is unclear. This should either be a permeable gravel type surface, or alternatively utilise stone slabs as used on the other side of the pair of houses at No. 16. It would also be preferable to provide hedge planting between the lawns to the front of the house and the proposed hardstanding, as has been carried out at No. 16. This would help visually contain the parking area and make a more satisfactory arrangement as a semi-detached BTM pair.

As it stands, it is not considered that previous reasons for refusal have been addressed.

#### Biodiversity, Landscaping and Trees

Policy LP15 of the Local Plan relates to biodiversity. This states that the Council will protect and enhance the borough's biodiversity.

Local Plan Policy LP16 relates to trees and landscape. LP16(A) states that the Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high-quality green areas, which deliver amenity and biodiversity benefits. LP16(B) goes on to state that to ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals will:

1. Resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice;
2. Resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;
3. Require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);
4. Require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of the native species is encouraged where appropriate;
5. Require that trees are adequately protected throughout the course of development, in accordance with British Standard (BS) 5837 (Trees in relation to design, demolition and construction – Recommendations).

With regards to landscape, Policy LP16(B) states the Council will:

1. Require the retention of important existing landscape features where practicable;
2. Require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and
3. Encourage planting, including new trees, shrubs and other significant vegetation where appropriate.

Trees on this property and application site are protected by the Trafalgar Road Conservation Area.

The most recently refused scheme proposed the loss of two trees. The application was accompanied by an invalid tree report.

The resubmitted scheme now proposes the loss of only one tree (as well as a shrub) and is accompanied by a revised Arboricultural Report produced by Challice consulting, dated 04/06/2021, ref. AR4678. This records seven individual trees and two groups as part of the original survey: four at Category B and five at Category C. (The Tree Plan includes multiple trees labelled G3 which is unhelpful.)

The tree proposed for removal is a common Holly Tree (T4), A Category B tree, and a mature shrub (G4).

The Council's Trees Officer has been consulted on the application and advises that the Holly tree is considered to be potentially TPO worthy as it makes a significant green contribution to the street. In addition, the shrub (multi-stemmed hazel) is a fair size established shrub and its loss would be noticeable on the streetscene.

The Trees Officer has advised that the application is not supportable in its current format. The loss of trees requires additional rationale and justification, in order to comply with Policy LP16 above. Further, no details of mitigation planting have been submitted, which again is a policy requirement. The applicant is advised that the Holly tree would need to be replaced with a tree likely to provide a similar amenity value, in terms of its size and longevity.

As it stands, it is not considered that the application has addressed previous reasons for refusal.

### Flood Risk

Policy LP21 of the Local Plan states that all development should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking into account climate change and without increasing flood risk elsewhere.

Whilst the site is in Flood Zone 1, it is also in an Area Susceptible to Groundwater Flooding, a Critical Drainage Area and a Throughflow Catchment Area. The proposed drawings indicate that the proposed hardstanding would be in permeable materials and that the proposed crossover would be at a gradient.

The officer report for the most recent refused scheme advised that whilst this information satisfied the requirements of the Transport SPD with regards to flood risk, the site's designations also require the submission of a Flood Risk Assessment and Sustainable Drainage Systems (SuDS) Statement, which were not provided. An informative was attached to the decision notice advising the applicant of their required submission with any future application.

Subsequent to the date of the issuing of the refusal, the Council has commissioned flood risk consultants to carry out an investigation into groundwater and throughflow catchment in the borough. The results of the investigation have been incorporated into the recent SFRA which requires a SuDS Statement for all development.

Again, no SuDS Statement has been provided with the application, despite the informative attached to the most recent decision notice. Notwithstanding the importance of this information given the nature of the development and the proposed loss of tree and hedgerow, it is now a requirement as per the Council's updated SFRA. It is therefore recommended that the absence of such information is included as a reason for refusal.

### Transport and Highways

The Council's Principal Transport Planner has been consulted on the proposal and advises that the application demonstrates that the criteria contained in the Transport SPD 2020 with regards to highways safety have been met. No objection to the proposals from a highways safety perspective are raised, subject to separate approval from the Council's highways authority.

#### Fire Safety

London Plan Policy D12 Fire Safety Part A requires the submission of fire safety information on all planning applications. The applicant has submitted a Fire Safety Strategy Statement prepared by the architect which addresses each of the criteria set out in Policy D12 Part A. The submitted information is considered to be proportionate and acceptable for a development of this scale and nature.

#### Conclusion:

The proposed new vehicular access, in the absence of adequate information justifying loss of tree and shrub, sufficient landscaping details and information of mitigation tree planting, is considered to fail to demonstrate that the visual amenities of the streetscene would be protected, to the detriment of the setting of the host Building of Townscape Merit and the character and appearance of the Trafalgar Road Conservation Area. As such, the application is considered to fail to comply with the aims and outcomes sought within the NPPF (2019) and the Local Development Plan, in particular, Policies LP1, LP3, LP4 and LP16 of the Local Plan (2018) and the Council's supplementary planning guidance: Buildings of Townscape Merit SPD (May 2015), House Extensions and External Alterations SPD (May 2015), the Twickenham Village Planning Guidance SPD (January 2018), Transport SPD (June 2020) and the Trafalgar Road Conservation Area Statement and Study.

Furthermore, in the absence of a Sustainable Drainage Systems Statement for an application that proposes loss of tree(s)/shrub(s) in area designated as being at high risk of groundwater flooding, the application fails to demonstrate that the proposed development would not lead to an unacceptable increase in surface flooding to the detriment of highways safety, property and human life. As such, the application would fail to comply with the aims and outcomes sought within the NPPF (2019), and the Local Development Plan, in particular, Policy LP21 of the Local Plan (2018) and the Council's Strategic Flood Risk Assessment – Level 1 Update (Updated 2020 with further minor updates March 2021).

**Recommendation: REFUSE**