

Fuller Long

Thomas Faherty
Planning Department
London Borough of Richmond Upon Thames
Civic Centre
44 York Street
Twickenham TW1 3BZ

9 /12/2021

Dear Mr. Faherty,

RE: Minor Material Amendment (MMA): application reference 19/2765/FUL at Land to the northeast of Simpson Road, Whitton

On behalf of the applicant, Richmond Housing Partnership, please find enclosed a Minor Material Amendment (MMA) application for proposed amendments to planning permission reference 19/2765/FUL which was approved on 20 August 2020. The description of the permitted development is as follows:

Erection of 5 no. 2 bed/4 person terraced houses (including 1 wheelchair unit) and 4 no. 3 bed/5 person semi-detached houses; formation of new access off Simpson Road and 12 no. off-street car parking space; creation of publicly accessible pocket park and pedestrian paths; ancillary structures and landscaping including new tree planting.

The application is accompanied by the following plans and documents:

- Energy Statement by Eight Associates
- Amended plans prepared by MAA Architects
 - RHP02-MAA-XX-DR-A-01103-P05
 - RHP02-MAA-XX-DR-A-01104-P05
 - RHP02-MAA-XX-DR-A-01401-P05
 - RHP02-MAA-XX-DR-A-02002-P05
 - RHP02-MAA-XX-DR-A-02004-P05
 - RHP02-MAA-XX-DR-A-04001-P05
 - RHP02-MAA-XX-DR-A-04002-P05

Proposed amendments

Planning permission (reference 19/2765/FUL) was granted in August 2020 for 9 houses (100% social rent), 12 car parking spaces, a pocket park and new landscaping/tree planting. The applicant is now looking to make the following changes to the approved application via a MMA application.

- Amendments to the proposed photovoltaic (PV) panels involving relocation of the panels on houses 1 to 4 (the 'Ilke' homes units) from the front to the rear elevation of the houses.

The applicant therefore seeks permission to vary planning condition reference U0078899 (Approved Documents and Drawings) attached to the permission which lists the approved drawings.

Site and surroundings

The site comprises a 0.27ha area of open space located on the northeast side of Simpson Road in the London Borough of Richmond Upon Thames. It is not situated within a Conservation Area and does not contain any statutorily or locally

listed buildings. The site is within flood risk zone 1 and some trees on the site are subject to a Tree Preservation Order (TPO).

The site is located adjacent to residential uses to the south and forms part of the Hounslow Heath/ Edgar Road housing estate, which is believed to have been constructed in 1960s. It also lies adjacent to open space to the north and west (Hanworth Recreation Ground and Hounslow Heath) which lies in the Green Belt.

Planning policy context

The Development Plan comprises the London Plan (2021) and the Richmond upon Thames Local Plan (2018). Other material considerations include the National Planning Policy Framework (NPPF), the National Planning Policy Guidance (NPPG), the Design Quality Supplementary Planning Document (SPD)(2006) and the Sustainable Construction Checklist SPD (2020).

Planning history

The following items are showing in the site's online planning history:

19/2765/FUL - *Erection of 5 no. 2 bed/4 person terraced houses (including 1 wheelchair unit) and 4 no. 3 bed/5 person semi-detached houses; formation of new access off Simpson Road and 12 no. off-street car parking space; creation of publicly accessible pocket park and pedestrian paths; ancillary structures and landscaping including new tree planting.* Approved 20 August 2020.

19/2765/NMA1 - *Non-material amendment to planning permission 19/2765/FUL for fenestration alterations to House 9, internal layout changes to House 9, overall reduction in building height across all dwellinghouses by approximately 300mm and bin store changes.* Approved 15 September 2021.

The following pre-commencement planning conditions have been discharged in connection with the above planning application reference 19/2765/FUL

- **19/2765/DD03** - Condition ref U0078900 - Grampian Parking Permits. Discharge of condition application approved on 25 June 2021.
- **19/2765/DD02** Condition ref U0078894 - Construction Ecological Management Plan. Discharge of condition application approved on 29 July 2021.
- **19/2765/DD01** - Condition ref U0078897 - Sustainable Urban Drainage Strategy. Discharge of condition application approved 4 August 2021.
- **19/2765/DD02** - Condition ref U0078898 - Arboricultural Method Statement. Discharge of condition application approved on 4 August 2021.
- **19/2765/DD02** Condition DV49 Construction Method Statement. Discharge of condition application approved on 29 July 2021.

Planning Assessment

Scale, massing, character and appearance considerations

Policy LP1 requires development to incorporate a high standard of architectural design based on sustainable principles. Proposals are required to demonstrate a thorough understanding of the site and how it relates to its existing context,

including character and appearance, and to take opportunities to improve the quality and character of buildings, spaces and the local area.

The amendments do not involve any changes to the scale and massing of the proposed development, and will therefore not affect the proposals in this regard. By relocating the PV panels from the front to the rear elevation of the houses, the proposals will have a reduced impact on the character, appearance and visual amenity of the area when compared to the approved scheme (reference 19/2765/FUL), because they will be located on a less publicly visible elevation. The existing trees on the rear boundary will also provide screening to further limit views of the panels. As such, the proposals will improve visual amenity compared to the approved scheme.

Impact on the adjacent Green Belt

Policy LP13 of the Local Plan emphasises that the Green Belt will be protected and retained in predominantly open use. The policy supports improvement and enhancement of the openness and character of the Green Belt and measures to reduce visual impact. It states that developments on sites outside Green Belt, any possible visual impacts on the character and openness of the Green Belt will be taken into account. As the proposals will not introduce any significant bulk or massing to the houses, and given the minor nature of the proposed changes to the PV panels, they will not affect the setting, openness or character of the Green Belt. In addition, as noted in the officer's report in support of application reference 19/2765/FUL, the belt of trees sited towards the rear of the site provide an extensive visual buffer, and direct views of the application site from the Hounslow Heath Open Space are currently extensively screened, and these trees are proposed to be retained. The proposed houses would also not exceed the height of the boundary trees and as such, the proposals will not appear unduly prominent when viewed from the adjacent green belt.

Affordable housing, housing mix and housing standards

As the proposal involves no changes to the proposed housing mix, amount of affordable housing and layout of the houses, it will not affect planning policy in this regard. We also note that planning policies relating to these matters have not significantly changed since the original application was approved in August 2020 (application reference 19/2765/FUL),

Residential amenity considerations

Policy LP8 states that in considering proposals for development, the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise, disturbance, sunlight, daylight and overshadowing. As the proposal involves no changes to the scale, bulk and massing of the development, and nor does it involve any changes to the location of windows or the introduction of roof terraces which could increase overlooking, it will not unduly affect residential amenity, and therefore complies with policy LP8.

Highways and parking considerations

Policy LP44 supports safe, sustainable and accessible transport solutions, and requires developments not to adversely affect the operation, safety and accessibility to the local or strategic highway networks. Policy LP45 requires new development to incorporate an appropriate level of off-street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. As the proposal involves no amendments to the number of proposed units, access arrangements or the level, design or location of car or cycling parking, it will not affect the approved development in terms of highways and parking matters.

Tree, landscaping and ecology considerations

Policy LP16 requires 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. In addition, policy LP15 protects and enhances biodiversity, and in particular sites designated for their biodiversity and nature conservation value. The proposals involve no changes in relation to existing and proposed trees and landscaping and will therefore not affect policy in this regard. An Arboricultural Method Statement (AMS) for the development was approved by the Council under discharge of conditions application 19/2765/DD02 approved on 4 August 2021.

Flooding and drainage considerations

Policy LP21 requires all developments to avoid or minimise contributing to all sources of flooding and to not increase flood risk elsewhere. The proposal involves no changes in terms of amount of hardstanding or the proposed drainage arrangements. A Sustainable Urban Drainage System (SUDS) strategy has been approved for the site under discharge of conditions application reference 19/2765/DD01 approved on 4 August 2021.

Renewable energy considerations

Policy SI 2 of the London Plan states that the Mayor is committed to London becoming a zero-carbon city. The Mayor's energy hierarchy should inform the design, construction and operation of new buildings. The priority is to minimise energy demand (be lean), and then address how energy will be supplied (be clean) and renewable technologies incorporated (be green). At the local level, Policy LP20 requires new development to minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy: 1. minimise internal heat generation through energy efficient design 2. reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls 3. manage the heat within the building through exposed internal thermal mass and high ceilings 4. passive ventilation 5. mechanical ventilation 6. active cooling systems (ensuring they are the lowest carbon options).

Policy LP22 requires development that results in a new residential dwelling to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption). It also requires developments to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Developments such as this are required to achieve a 35% reduction in carbon dioxide emissions over Building Regulations 2013.

The application is accompanied by an Energy Strategy prepared by Eight Associates which confirms that the proposal can achieve an on-site carbon dioxide reduction of 37% beyond Building Regulations through energy efficiency measures and renewable technologies (PV panels). The proposal will reduce carbon emissions by 8.7% from the fabric energy efficiency measures described in the 'Be Lean' section of the report and will reduce total carbon emissions by 37% over Building Regulations (using SAP 10.0 carbon dioxide emission factors) with the further inclusion of low and zero carbon technology (Photovoltaic panels). The proposal therefore exceeds the carbon reduction target of 35% required by Policy LP22.

Conclusion

The proposal seeks permission to vary planning condition reference U0078899 (Approved Documents and Drawings) attached to application reference 19/2765/FUL which lists the approved drawings to allow for the relocation of PV panels on houses 1 to 4 from the front to the rear elevation. The proposals do not involve any increase in the scale, bulk or massing of the houses, and by relocating the panels from the front to the rear elevation, which is less publicly visible, they will improve the character, appearance and visual amenity of the site. The application is accompanied by an Energy Strategy prepared by Eight Associates which confirms that the development will comply with planning policy in terms of carbon dioxide emission reduction requirements. The proposals do not involve any changes that will affect residential amenity, trees, landscaping, ecology, flood risk, drainage, highways, parking, the adjacent green belt, affordable housing, housing mix and housing standards.

We trust the submitted information will enable the Council to approve the above changes as a MMA.

In the meantime, if you have any queries relating to the above, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads "K. Anthony". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Kelly Anthony
Fuller Long Planning Consultants