

Ref: BF/5537/01(15May2022)/LBoRuT

Ms Holly Eley
Development Management Team
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ



16 May 2022

Dear Ms. Eley,

APPLICATION REF. 22/0934/FUL APPLICANT RESPONSE TO PUBLIC CONSULTATION COMMENTS

We write to you on behalf of our clients, Bartosz and Claire Tkacz, the applicants of planning application ref. 22/0934/FUL at 25 Ham Farm Road, Richmond, TW10 5NA. We wish to provide rebuttal in response to the public consultation comments received in relation to the proposed "*Demolition of existing dwelling house and construction of replacement single storey dwellinghouse and associated hard and soft landscaping.*"

We note a number of public consultation comments have been received in relation to the proposed development, both objecting to and in support of the development. A total of 128 public submissions are available to view on Richmond Council's planning and development portal. Of these, 22 (17.2%) support the proposals and 106 (82.9%) objects to the proposals (this figure includes objections submitted by the Twentieth Century Society and the Council for British Archaeology).

Whilst we note the number of objections received, further scrutiny should be given to the location/residence of objectors. Figure 1 below shows a breakdown of the objections received, based on location. As is evident, only 1% of objections have come from residents of Ham Farm Road and a further 16% of objections have come from residents within the TW10 postcode. The largest locality objections have been received from is the wider UK, outside the immediate locality of the site. This demonstrates that, of all objections received, a small proportion (17%) are actually from residents of the local area. These residents have a deeper understanding of the historic setting and value of the Parkleys Estate Conservation Area.

Conversely, Figure 2 shows a detailed analysis of the supportive comments and the locality in which they have been received from. The graph shows that 18% of supportive comments have been received from residents of Ham Farm Road and a further 18% are from within the TW10 postcode. This equates to a total of 36% of comments of support received from local residents of Ham. There is also strong support from residents of Barnfield Avenue. Whilst this sits outside of the TW10 postcode and the conservation area, the street is adjacent to it and in fact some of the residences are closer to the application site than those of Parkleys Estate.

Whilst all public comments are given due consideration, more weight should be given to the views of those local to the development, who reside within the Parkleys Estate Conservation Area. The two graphs shown in Figures 1 and 2 demonstrate that there is greater support for the proposals locally. These are residents that would be the most affected by the proposals and who, by living in the Conservation Area, understand and appreciate its importance and value.

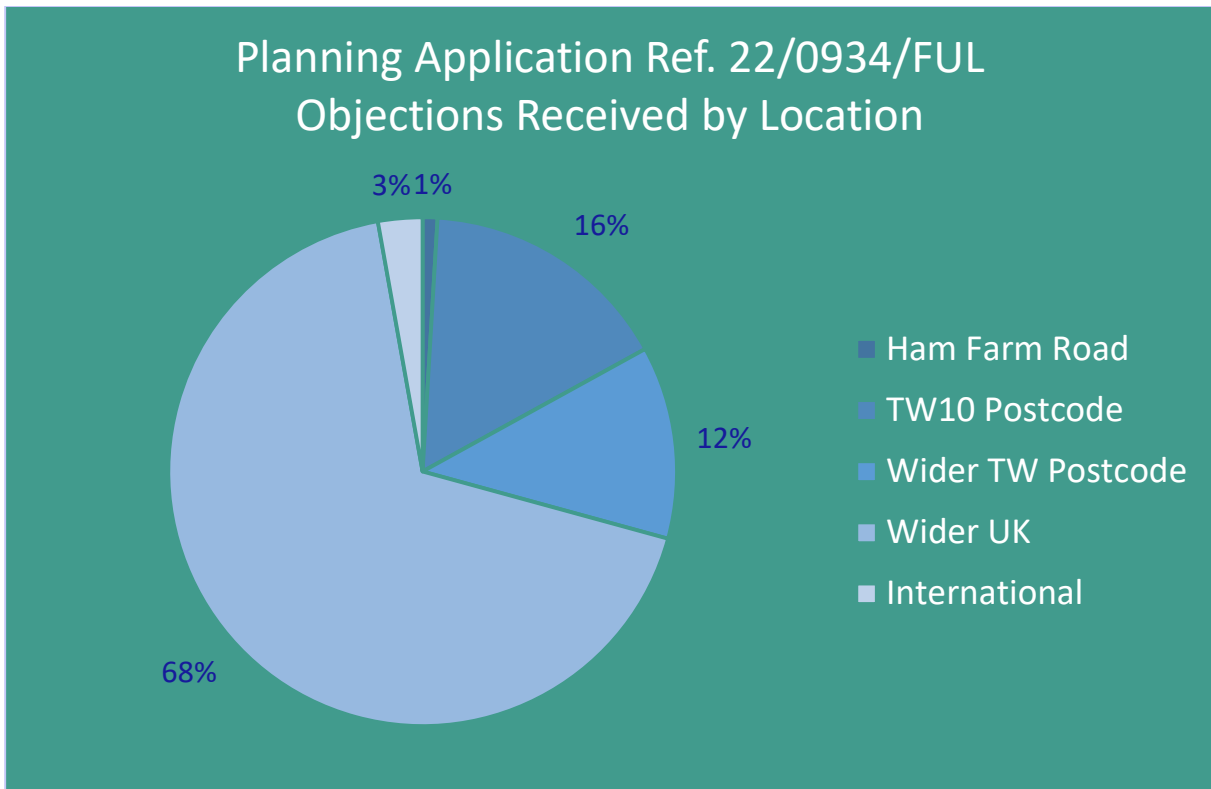


Figure 1: Analysis of Objections by Locality

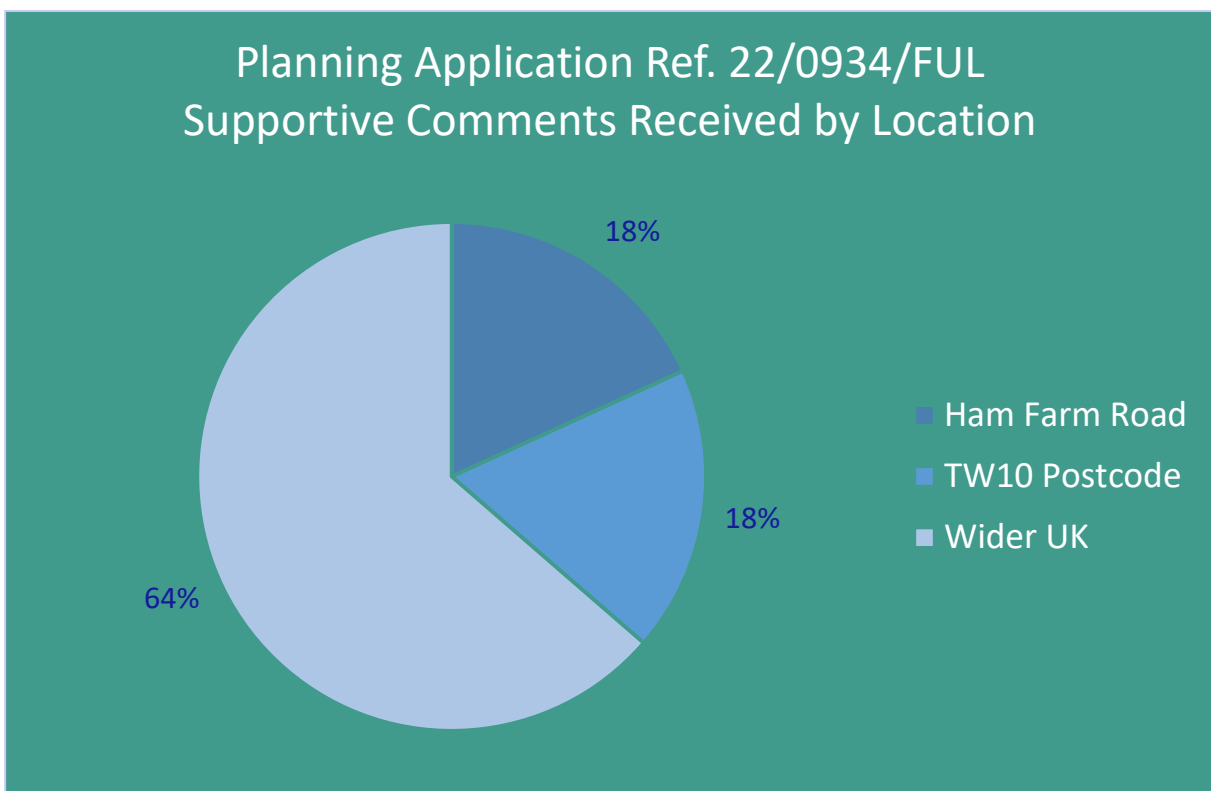


Figure 2: Analysis of Supportive Comments by Location

The date which the objections were received is also important to note as this correlates with a Twitter post that originated from the Twentieth Century Society. Prior to the Twitter post, Richmond Council's notice of the planning application was on display at the property for up to three weeks. During this time only comments of support were received in relation to the proposals, which were from local residents.

Whilst the society is within their right to campaign in such a way, the post was subjective, urging followers to object without suggesting review of the contents of the application and the merits within it. This is apparent in the influx of objections received after the post objecting to the principle of demolition without regard for the contents of the application itself.

In the context of the Society's reach of over 20,000 followers on this platform alone, 106 objections is not a significant number, and it is only fair to note that the post also received support for the building's demolition, most noting that the building was not a great example of Eric Lyons' work. From the original post, of the 18 responses received, 6 (33%) were comments in support of its demolition and 10 (55%) were comments in favour of preservation of the building. The remaining comments were neutral.

In response to the public objections received, there are two key concerns raised. We have addressed each below:

1. Concerns regarding loss of building and its importance as an architectural heritage asset

We refer to the originally submitted Heritage Impact Assessment and rebuttal letter prepared by HCUK Group. Whilst we note the historic connections the building and the wider locality may have to Eric Lyons, 25 Ham Farm Road itself is of low heritage value. This is supported by Historic England's Assessment of the building in December 2021 in which they state that the building *"lacks refinement and consistency as a whole and as a bespoke, detached house, the planning at 25 Ham Farm Road is limited in its claim to special interest."* The report continues, noting *"the understated elegance which characterises Lyons' work is not best represented in this building and the rarity of its survival is not sufficient to override its shortcomings."*

The limited heritage value of the building does not weigh significantly in favour of its retention and the proposed replacement dwelling, would preserve the special character and appearance of the conservation area and setting of the other Non-designated Heritage Assets on Ham Farm Road through the introduction of a more successful architectural composition that incorporates and develops the positive aspects of the existing building's design. In doing this, the replacement dwelling will make a positive contribution to the conservation area. Thus, the Proposed Development as a whole is acceptable in heritage terms.

2. Concerns regarding sustainability of proposed demolition

As outlined in our original Planning Statement, the retention of the existing building was explored in the first instance. This was deemed to not be feasible due to the structural integrity of the building and associated costs to remedy the building's defects, and the achievable energy rating of the existing building. It was concluded that a highly efficient replacement building would be a more sustainable option.

As outlined in the Energy Statement submitted with the original planning application, the replacement dwelling will achieve a reduction in regulated CO2 emissions of 91% beyond minimum building regulation standards (2013). This far exceeds the required 35% reduction found in Policy LP22 of the Local Plan. The replacement dwelling will also achieve a score of

four stars on the Home Quality Mark Rating in accordance with Policy E1 of the Neighbourhood Plan.

3. *Queries regarding the accessibility of the existing building*

Some objections have commented on the accessibility of the existing house as the original owner suffered from Parkinson's disease. As outlined in the submitted Access Audit Report, the building is not fit for a full-time wheelchair user. The building includes a number of steps including one on the approach into the dwelling. We are not refuting the claims that the original occupant was a wheelchair user; however, it may be the case that they were able to propel themselves manually and cross stepped thresholds. The applicant is not able to do this and as such requires the use of a powered wheelchair, which cannot be lifted over even small steps. The width of the wheelchair used by the applicant is also wider than a standard manual chair and as such, requires more room for manoeuvring.

The planning application has also received a number of supportive comments, which we welcome and concur wholly with. As noted above, majority of these have been received from residents on Ham Farm Road or within the Parkleys Estate Conservation Area. We have summarised these below:

1. Improved sustainability
2. Improved accessibility
3. Improved architecture and aesthetic
4. Positive and considerate contribution to local architecture and conservation area

On this basis, we strongly support the proposals and recommend approval of the planning application without delay. We trust the above is sufficient to enable the Council to finalise their assessment of this planning application and look forward to receiving their response. Should you require further clarification of the contents of this letter or the planning application itself, please do contact Brie Foster on 07341 564 834 or brie.foster@peacockandsmith.co.uk.

Yours faithfully,



BRIE FOSTER
Associate