

# PLANNING STATEMENT



Erection of three dwellings  
with associated driveway, parking and landscaping  
on  
Land rear of 24 Hampton Road, Twickenham

August 2022

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## **1.0 INTRODUCTION**

- 1.1 This Statement has been prepared by Hedley Clark on behalf of Mr. Davies (“the applicant”) in support of a full planning application for the erection of 1 no. single storey detached dwelling and a pair of semi-detached dwellings, with associated access drive, parking and landscaping (“the Proposal”) on land rear of 24 Hampton Road, Twickenham (“the Site”).
- 1.2 The purpose of this Statement is to illustrate the key factors that have influenced the design of the proposal and to demonstrate how it accords and complies with the principles and policies established by the National Planning Policy Framework (NPPF) and development plan requirements.
- 1.3 This statement should be read in conjunction with the drawings prepared by GDM Architects and all other supporting documentation submitted as part of the planning application.

## **2.0 SITE DESCRIPTION**

- 2.1 The Site comprises an area of land, extending to 0.09ha, set behind 24 Hampton Road and extending northeast behind 22 - 16 Hampton Road. Access to the site is achieved via an existing vehicular entrance that lies to the east of no.24 Hampton Road. The OS extract shows the application site in its context.



*Figure 1 – OS extract*

- 2.2 The site is relatively level and is vacant, having been poorly managed for many years. It has recently benefitted from scrub clearance and tree works have been approved earlier in 2022. The boundaries are defined by brick walls, with the exception of the timber fencing that delineates the northern boundary and the rear boundary of no. 24. There are existing areas of hardstanding, concrete bases and evidence of foundations on site.
- 2.3 There is a pocket of open land to the north of the site which is land locked and outside any garden curtilage. There is no boundary treatment with this land at the north west corner and it is not within the red line application site. There are several trees within and adjacent to the Site, including a mature Eucalyptus located centrally which is subject to a Tree Preservation Order (TPO).
- 2.4 The area is predominantly residential although the site lies adjacent to the garden of a Public House (PH) to the west and a detached building in Class E use is sited to the east, with a Church beyond. The frontage properties along Hampton Road are generally substantial in form, extending over 2-3 floors, and have a regular and tight rhythm to their

spatial arrangement. There are very limited views between these frontage properties. No. 24 is distinct in appearance with its Dutch gable.

- 2.5 The properties fronting First Cross Road are varied in terms of form and scale and are tightly arranged along the frontage. The spatial arrangement and form of buildings along First Cross Road afford limited appreciation of the site other than views of the upper crown of the Eucalyptus tree. The back gardens that lie to the north of the application site include various outbuildings.
- 2.6 To the north (rear) of the site are properties set back from any road frontage (please refer to the OS extract). These properties do not benefit from any frontage or vehicular access. The most notable backland development is Chilvers Close, with other backland properties accessible from First Cross Road. The spatial pattern of development in the immediate area thus includes backland development and properties without road frontages.
- 2.7 The site lies within the Twickenham Green Conservation Area, with greater detail about the history and significance of the conservation area provided within the Heritage Statement prepared by Barker Mills Conservation. In summary, the appraisal notes the site was separated from the properties fronting First Cross Road and Hampton Road at the time of the Conservation Area designation. It goes on to conclude:

*“The upper crown of the large gum tree is visible in views of the site from both Hampton Road and First Cross Road and the Green itself and makes a contribution to the mixture of green landscape and vegetation that provides the characteristic context for much of the development in the area. The site is otherwise not visibly appreciated from within the conservation area as it is screened by later development, or hard boundary treatments consisting mainly of brick walls.*”

### **3.0 RELEVANT PLANNING HISTORY**

- 3.1 Under application 8523147 permission was granted in 1967 for the conversion of 24 Hampton Road into two flats and one maisonette.
- 3.2 The north eastern end of the application Site (not including the access that forms part of this submission) formed part of a site on which permission for two dwellings was proposed under 96/1121/FUL. Under this previous application, access for proposed via the demolition of the most eastern brick wall. This application was refused and a subsequent appeal (T/APP/I1580/A/96/268892) dismissed.
- 3.3 Whilst the decision is now dated and attracts very limited weight, the concerns at that time related to the encroachment on space and the partial demolition of an historical wall enclosing Willow Court to the northeast in order to achieve access.
- 3.4 This proposal benefits from access via the existing access serving 24 Hampton Road and does not require the demolition of the wall enclosing Willow Court. There is no functional or physical link between the site and the neighbouring site, in contrast to the previous appeal. The manner in which the proposal protects the significance of the conservation area and the contribution the site makes to its character is fully detailed within the accompanying Heritage Statement.

## 4.0 PROPOSED DEVELOPMENT

- 4.1 The site and surrounding area have been carefully appraised, with the established pattern, grain, form and scale of development influencing the proposals. Regard has also been had to the landscaped character of the site including the central tree subject to a TPO with a desire to not only retain this but make it central to the design. Overall, the scheme has evolved having regard to an analysis of the area and surrounding development, the 'role' of the site in its context and the desire to achieve a high-quality development befitting for the site within a conservation area.
- 4.2 A number of layout and design iterations have been considered (as set out in the DAS) and these have evolved to the current scheme which comprises 1no. detached single storey dwelling located along the western boundary of the site with a pair of semi-detached dwellings located at the north eastern end. The existing drive serving 24 Hampton Road would be extended to serve the development and would provide access to 3no. parking spaces. The proposed site layout is shown on the drawing extract below.

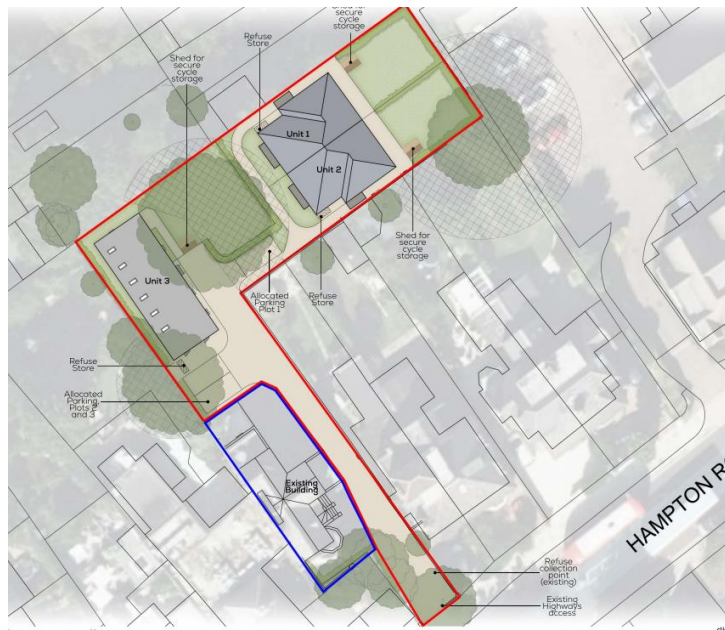


Figure 2 – Proposed Site Layout

- 4.3 The pair of semi-detached units extend to 123qm and would be located at the northeast end of the site. They have been orientated such that they face west towards the central area of the site. This arrangement allows for the provision of rear amenity space and

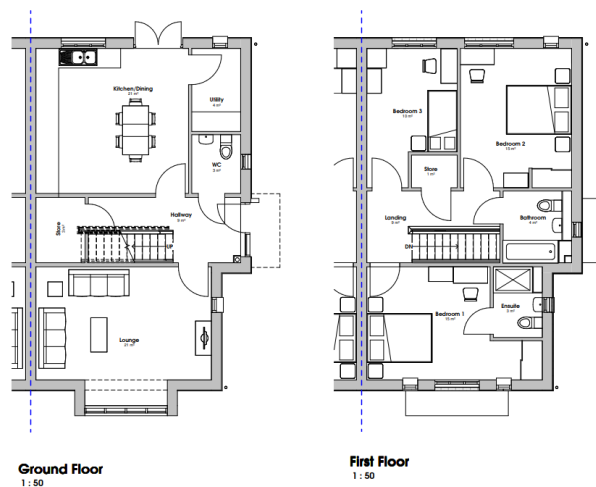
avoids the need for side facing windows to serve habitable rooms. The layout also ensures the protected tree is unaffected whilst offering a focal point to the development.

- 4.4 The scale and appearance of these units has been influenced by the cottage properties located along First Cross Road and those set in the backland sites to the north. The scale and height would be subordinate to the properties fronting Hampton Road. Whilst traditional in form, scale and overall appearance, contemporary influences can be found on the bay window and porch detailing. A drawing extract showing the front elevation of the pair of semi's is shown below.



*Figure 3 – Front elevation of Units 1 & 2*

- 4.5 The pair of semi's would provide 3 bedrooms at first floor level with living accommodation at ground floor level. Direct access to the private amenity space is achieved. The drawing extract below shows the floor plans for Unit 2 (handed for Unit 1).



*Figure 4 – Floor plan for Unit 2 (to be handed for Unit 1)*



- 4.6 The single storey 2 bedroom unit is located immediately to the rear of 24 Hampton Road and would extend to 89.5sqm. It has been sited and designed to optimize views towards the central part of the site and the protected tree. In response to the setting of this property and having regard to its single storey form, its design has been influenced by neighbouring single storey garden outbuildings. The single storey property is therefore deliberately subordinate in scale and more contemporary in design and appearance, relying on materials and form that is already evident in the garden settings beyond the site. An extract of the drawings showing the elevations for Unit 3 are shown below for ease of reference.



**North East Elevation**

*Figure 5 – Front elevation of Unit 3*

- 4.7 There is commonality in the design language between the more traditional pair of semi's and the single storey unit in terms of materials and the modern flat roof bay windows/porches.
- 4.8 Bin and secure cycle storage is proposed for each unit together with electric vehicle charging.
- 4.9 Further details of the proposal, including details of materials, are provided in the Design and Access Statement and the drawings prepared by GDM Architects.

## **5.0 PLANNING POLICY FRAMEWORK**

### **National Planning Policy Framework (NPPF)**

5.1 The revised NPPF confirms that plans and decisions should apply a presumption in favour of sustainable development. For decision taking (para.11) this means:-

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
  - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.2 Chapter 5 of the NPPF deals with ensuring there is a sufficient supply of homes. Paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly.

5.3 Chapter 16 deals with conserving and enhancing the historic environment. Paragraph 189 recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 199 states that great weight should be given to an asset's conservation, the more important the asset the greater the weight should be. Paragraphs 202 states that where a development proposal would lead to less than substantial harm to the significance of a heritage asset, this should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.

### **The Development Plan**

5.4 Development plan policies relevant to the determination of the current application comprise the policies of the London Plan (2021), and Richmond Local Plan (2018).

London Plan (2021)

5.8 Relevant policies of the London Plan include:

- D1 London's form, character and capacity for growth
- D3 Optimising site capacity through design led approach
- D4 Delivering good design
- D5 Inclusive Design
- D6 Housing quality and standards
- D12 Fire Safety
- D14 Noise
- H2 Small Sites
- H4 Delivering Affordable Housing
- H10 Housing Size, Mix
- HC1 Heritage Conservation and Growth
- G6 Biodiversity and access to nature
- G7 Trees and Woodlands
- S18 Waste Capacity
- SI12 Flood Risk Management
- SI13 Sustainable Drainage
- T4 Assessing and mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking
- T7 Deliveries, servicing and Construction

Richmond Local Plan (2018)

5.9 The relevant policies from the Richmond Local Plan (2018) include:

- LP1 Local Character & Design Quality
- LP2 Building Heights
- LP3 Designated Heritage Assets
- LP4 Non Designated Heritage Assets
- LP8 Amenity and Living Conditions
- LP10 Local Environmental Implications, Pollution and Land Contamination
- LP15 Biodiversity
- LP16 Trees, Woodland and Landscape
- LP20 Climate Change and Adaptation
- LP21 Flood Risk and Sustainable Drainage
- LP22 Sustainable Design & Construction

- LP23 Water Resources and Management
- LP24 Waste Management
- LP34 New Housing
- LP35 Housing Mix and Standards
- LP36 Affordable Housing
- LP39 Infill, Backland and Backgarden Development
- LP44 Sustainable Travel Choices
- LP45 Parking Standards and Servicing

Other Relevant Documents

- 5.10 The following documents are relevant to the consideration of the current application:
- Design Quality SPD
  - Residential Development Standards SPD
  - Sustainable Construction Checklist SPD
  - Affordable Housing (2014)
  - Transport (2020)
  - Refuse and Recycling Storage Requirements (2015)
  - Small and Medium Housing (2006)
  - Twickenham Green Conservation Area Statement

## **6.0 PLANNING POLICY ASSESSMENT**

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. This approach is supported by the National Planning Policy Framework (NPPF).

6.2 In considering whether to grant planning permission with respect to any buildings or other land in a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention be given to the desirability of preserving or enhancing the character or appearance of the Conservation Area. In this context, “preserving” means not generating harm.

### **PRINCIPLE OF DEVELOPMENT**

6.3 The NPPF sets out a presumption in favour of sustainable development and advises Council’s to take a positive approach to delivering new homes. Chapter 5 of the revised National Planning Policy Framework (NPPF) encourages local planning authorities to ‘boost significantly the supply of housing’ to ‘deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities’.

6.4 Encouragement for the delivery of new housing is also expressed within London Plan 2021 and Policy LP34 of the Council’s adopted Local Plan (2018). As noted under Policy LP34 of the Local plan, the Official borough has set a target of creating 3,150 new houses between 2015-2025. Policy LP34 further supports new homes which are an acceptable standard.

6.5 Policy LP39 states that all infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In consideration applications for infill and backland development the following factors should be addressed:

1. Retain plots of sufficient width for adequate separation between dwellings;
2. Retain similar spacing between new buildings to any established spacing;
3. Retain appropriate garden space for adjacent dwellings;
4. Respect the local context, in accordance with Policy LP2 Buildings Heights;
5. Enhance the street frontage (where applicable) taking account of local character;
6. Incorporate or reflect materials and detailing on existing buildings;
7. Retain or re-provide features important to character, appearance or wildlife;

8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens;
9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light form vehicular access or parking.

6.6 Accordingly, subject to an assessment of the above, and having regard to the legislative requirements for development within a designated Conservation Area, there is no in principle objection to the development of this site for residential purposes.

### **DESIGN**

6.7 NPPF (2021) Paragraph 134 sets out that *“development that is not well designed should be refused, especially where it fails to reflect local design policies.”* Policy LP1 of the Local Plan 2018 seeks to maintain and, where possible, enhance the high architectural and urban design quality which contributes to the character and heritage of the area. Proposals should demonstrate an understanding of the site and its context when considering the design including layout, siting and access and the compatibility of the works to the neighbouring uses.

6.8 As noted in paragraph 6.4, Policy LP39 of the Local Plan 2018 is permissive of infill and backland development subject to meeting a number of criteria.

6.9 The Councils ‘Small and Medium Housing Sites’ SPD states that new residential development must have regard to potential impacts on local character, plot layout and grouping, amenity and parking amongst others.

6.10 Whilst the scheme may be considered as ‘backland’ by virtue of its position rear of existing frontage properties, it has not formed part of any garden space for a considerable number of years (pre-dating the designation of the Conservation Area). Accordingly, the proposal would not reduce the size of any private garden space of any existing property (**criterion 3 of Policy LP39**).

6.11 Whilst the site has not been used or managed as garden space for a considerable number of years, the central TPO tree is recognised as being of public amenity value and visible over rooflines. The scheme is sensitive to this landscape feature and allows it to become the focal point of the development, reflecting its importance and value to character of the area.

- 6.12 Unit 3 (single storey) is located to the rear of no.24, a substantial 3 storey building, whilst Units 1 and 2 are located rear of those properties fronting Hampton Road which are more substantial in height than the proposal. Any glimpse views achieved along the access drive to the development would not therefore be dominated by buildings, retaining a sense of visual space characterized by the existing protected tree.
- 6.13 Accordingly, the landscape character of the site, defined by the protected tree and sense of space around it would be retained, in accordance with **criterion 7 of Policy LP39**.
- 6.14 As previously noted, Hampton Road and First Cross Road are characterized by properties arranged in a tight knit spatial pattern, with limited lateral space between them. The existing backland developments in the immediate area also tend to comprise tight knit spatial arrangements.
- 6.15 By virtue of the proposals relationship with adjacent buildings and rear gardens, the proposed spatial arrangement would achieve appropriate space between neighbouring properties and site boundaries. Units 1 and 2 would not appear cramped in their plot and would reflect the pattern of development/space between buildings in the area.
- 6.16 Unit 3 would be sited at the western end of the site, set more than 13m beyond the rear of 24 Hampton Road and set back from the open land to the north. Whilst abutting the western wall, this property would not appear cramped in relation to its plot, the wider site, or neighbouring built form by virtue of its modest form, height, scale and lateral space around it. The site layout therefore provides a sensitive solution, respecting spatial patterns and spaces between buildings in the area, whilst optimizing the efficient use of the site to deliver housing (**criteria 1 & 2 of Policy LP39**).
- 6.17 The height of the scheme has been carefully considered in the context of neighbouring properties and the conservation area more generally. Care has been taken to ensure the development sits quietly to the rear of the Hampton Road frontage properties, below their ridge height. The scheme would therefore be recessive in relation to the height of the frontage properties and would be visually subordinate in any limited glimpse views. It is further noted that Unit 3 has been deliberately designed to be single storey form, with a mono pitch roof, again reflecting the form and low height of garden buildings to the north.
- 6.18 The height of the proposal is therefore respectful of established buildings height in the area, ensuring the scheme is not visually intrusive or harmful in this regard (**criterion 4 of Policy LP39**).

- 6.19 The design of the units scheme reflects the proportions, form and scale of existing development, most notably the smaller cottage typology and more ancillary single storey timber buildings found in the immediate area. Units 1 & 2 are influenced by the traditional cottage form whilst introducing contemporary detailing, reflective of their time. They include recessed side projections, bay windows and fully hipped roof, features characteristic of the area.
- 6.20 Unit 3 is deliberately more contemporary in form and appearance, reflecting the backland nature of the site and the presence of similar timber clad buildings in the immediate garden settings. This design approach is responsive to the backland setting of the site and local character.
- 6.21 The does not result in the loss of any garden space and would not change or interrupt established boundary arrangements or details.
- 6.22 As set out in the DAS, the choice of materials has been influenced by those found in the local area, whilst allowing the properties to appear of their time which is an appropriate response for development within a conservation area, allowing the evolution of development to be legible.
- 6.23 The proposal incorporates and reflects both detailing of existing buildings and materials found in the area, whilst retaining features important to its character, in compliance with criteria **6 & 7 of Policy LP39**).
- 6.24 As addressed in greater detail in paragraphs 6.34 – 6.51, neighbouring amenities are afforded appropriate protection in accordance with **criterion 8 of Policy LP39**.
- 6.25 The scheme is served by an appropriate access, parking, bin and cycle storage, as set out in the accompanying Transport Statement prepared by Motion (**criterion 9 of Policy LP39**).
- 6.26 For the reasons presented above and as addressed within the DAS, the design basis and detailing of the scheme is sensitive to its context and would not cause harm. No conflict with the NPPF or adopted policy would arise in this regard.



**HERITAGE IMPACT**

- 6.27 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention be given to the desirability of preserving or enhancing the character or appearance of the Conservation Area. In this context, “preserving” means not generating harm. This is reflected in the advice of the NPPF and policy LP3 of the Local Plan.
- 6.28 The application is accompanied by a Heritage Statement prepared by Nigel Barker-Mills, with input provided throughout the design process.
- 6.29 In assessing the impact on the heritage assets, the statement concludes that the contribution of the existing site to the special character and appearance of the conservation area is limited, with early historic maps of the mid-19<sup>th</sup> century indicating that whilst the site may have previously formed part of rear space used as a garden for a property on Hampton Road, it has been separated from the properties along First Cross Road and, seemingly, those along Hampton Road for a considerable period of time, certainly before the designation of the Conservation Area. At the time of designation, the site was not therefore used as garden space.
- 6.30 It is further concluded that whilst the upper crown of the large gum tree is visible in views of the site from both Hampton Road and First Cross road and the Green itself and makes a contribution to the mixture of green landscape and vegetation that provides the characteristic context for much of the development in the area, the site is otherwise not visibly appreciated from within the conservation area.
- 6.31 The Statement assesses the impact of the proposals on the Conservation Area and adjacent heritage buildings and concludes that the proposed development has been designed with a good understanding of the heritage significance of the conservation area and adjacent buildings. The location and design of the units is a sensitive response to the constraints of the site and ensures that in terms of public views there is no visual impact or harm. The setting of adjacent historic buildings has also been appropriately conserved.
- 6.32 The proposed residential use and form of the development conserves the character of the conservation area and in providing an attractive, environment of intimate scale it enhances the current and former historic appearance of the site as an overgrown and neglected inaccessible space.

- 6.33 The report ultimately demonstrates that the proposals do not raise cause any harm to the heritage interests.

**NEIGHBOURING AMENITY**

- 6.34 Policy LP8 of the Local Plan seeks to protect neighbouring amenity, including by ensuring that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting. It further notes that the Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings and that adjoining land or properties are protected from overshadowing.
- 6.35 The SPD 'Small and Medium Housing' (2006) states that to make sure that the privacy of occupiers is respected the windows of main facing habitable rooms should preferably be no less than 20m apart. Where principal windows face a wall that contains no windows or those that are occluded separation distances can be reduced to 13.5m.

***18 Hampton Road***

- 6.36 Units 1 and 2, the pair of semi-detached dwellings are located to the rear of 18 Hampton Road. An existing brick wall defines the common boundary. The properties have been designed with a hipped roof and this design together with the separation distance ensure the development, whilst visible, would not appear unduly intrusive or overbearing.
- 6.37 Being sited to the north of this neighbouring property, the development would not result in a loss of daylight or sunlight.
- 6.38 No side facing windows serving habitable rooms are proposed and no overlooking would arise. The first floor flank windows on Plot 2 would serve bathrooms and would be obscured glazed, a matter that can be secured by condition. No loss of privacy would result.
- 6.39 It is further noted that whilst the decision is of some age, neither the LPA nor the Planning Inspector concluded the previous scheme, for 2 dwellings on the plot, would cause harm to these neighbouring occupiers.

***16-22 Hampton Road***

- 6.40 The impact on no.18 is dealt with above. No's 16, 20 & 22 lie to the south of the application site and would not experience loss of daylight or sunlight by virtue of the orientation.

- 6.41 The first floor windows (facing west and east) are at oblique angles to the rear gardens of these neighbouring properties, with an existing tree also located in the rear garden of no.16. The oblique angles would preclude any harmful loss of privacy from the first floor windows into neighbouring gardens. It is also respectfully noted that the relationship between the proposal and these neighboring properties is not unusual in the context of the area.
- 6.42 The side facing windows at first floor do not serve a habitable rooms and would be obscure glazed, a matter that can be controlled by condition. No loss of privacy would occur.
- 6.43 The proposal would be visible from these neighbouring properties but having regard to the separation distances and their form, scale and mass, they would not appear visually overbearing or create an undue sense of enclosure.
- 6.44 Unit 3 is single storey in form and this together with its siting ensures no harm to these neighbouring occupiers would arise.
- 6.45 As previously noted, no objections relating to impact on neighbours have been raised historically in relation to development on this site.

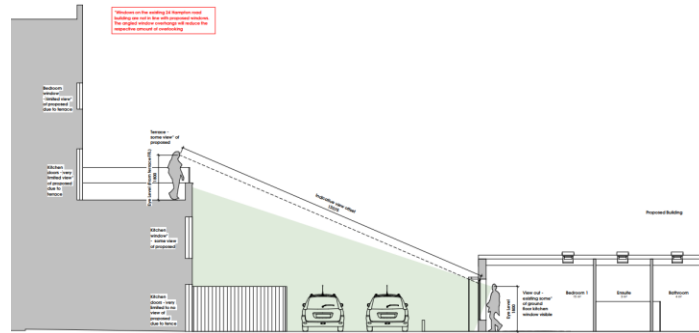
***Willow Court***

- 6.46 To the east of the site lies Willow Court, with a building in Class E commercial use lying adjacent to the common boundary. This commercial property does not have any flank windows looking towards the site and no mutual overlooking would arise.
- 6.47 The residential properties at Willow Court are sited such that the proposal would not be overbearing, result in a loss of light or cause harmful loss of privacy.

***24 Hampton Road***

- 6.48 Units 1 & 2 are sited such that they would not impact on 24 Hampton Road or the PH which lies to the south.
- 6.49 Unit 3 has been carefully considered in terms of its relationship with neighbouring properties. The ground floor bedroom windows on the southern elevation would not allow overlooking to the rear facing windows of 24 Hampton Road. To further ensure

no loss of privacy for either the proposed or existing properties, the bedroom windows are designed such that the depth and angle of the window surround precludes direct overlooking up towards the upper floors/terrace of 24 Hampton Road (and vice versa). This is demonstrated on the drawing extract below.



*Figure 6 – Section showing oblique and limited intervisibility*

- 6.50 It is further noted that the bedrooms in Unit 3 would benefit from rooflights which would provide further outlook as well as daylight/sunlight, without reliance on the southern windows. Having regard to the use of the windows on the rear elevation of 24 Hampton Road, the relationship between the raised terrace and the southern windows and the design detailing, no harmful loss of privacy would arise.
- 6.51 The single storey form of unit 3, separation distances, design detailing and existing boundary treatments ensure no overlooking to 24 Hampton Road would arise.

**Public House**

- 6.52 The Prince Albert PH and pub garden lie to the west of the site. Unit 3 has been designed with a height and mass that ensure it would not appear overbearing or intrusive to users of the PH or its garden area. No overlooking would arise and no loss of daylight/sunlight would occur.

**HOUSING MIX AND STANDARDS**

- 6.53 Policy LP35 encourages family size accommodation outside Town Centre boundaries and notes that generally, the housing mix should be appropriate to the location and determined on a site by site basis. The provision of 2no. 3 bedroom family dwellings and 1no. 2 bedroom dwelling provides family sized accommodation in an area that is characterized by such. Accordingly, the housing mix proposed is considered appropriate to the location and the site, in compliance with Policy LP35.

- 6.54 Policy LP35 of the Local Plan and Residential Standards SPD for external and internal space standards set out standards to ensure a satisfactory standard of accommodation is proposed. All units exceed the nationally described space standards and all bedrooms would at comply with minimum space standards.
- 6.55 All habitable rooms would benefit from appropriate outlook and daylight/sunlight. In addition to the windows on the southern, eastern and northern elevation, the rooms in Unit 3 would also benefit from rooflights, providing additional daylight/sunlight and sky views.
- 6.56 Policy LP35 (c and d) and the Councils Residential Development Standards SPD seek sufficient external amenity space. The current Residential Development Standards SPD, adopted in March 2010, sets out general guidance on amenity space. It seeks “a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an additional 1sqm per additional occupant” The level of amenity space per unit exceeds this general guidance.
- 6.57 Policy LP35 (d) sets out that amenity space should be
- a. private, usable, functional and safe;
  - b. easily accessible from living areas;
  - c. orientated to take account of need for sunlight and shading;
  - d. of a sufficient size to meet the needs of the likely number of occupiers; and
  - e. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.”
- 6.58 In this case, the amenity space responds to the site and is proportionate to the housing mix whilst being level and accessible. All amenity space is directly accessible and would provide both sunlight and shading. The accompanying tree report confirms the proposal would not experience undue shading or lead to pressure for excessive pruning.
- 6.59 The proposed development would deliver high quality housing with a good standard of amenity for future occupants, in compliance with development plan policy.

**TREES AND LANDSCAPE**

- 6.60 Local Plan Policy LP16 requires protection of existing trees and 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. LP39 also sets out that infill developments should retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape.
- 6.61 The site has been vacant for a considerable number of years and has not been well managed or maintained. Clearance works to ground cover has been undertaken and approval has been given for these works including works to existing trees.
- 6.62 A Tree Survey has been undertaken and an AIA accompany this submission. As part of the survey work, trial holes were dug around several of the existing structures, boundary walls and areas of hardstanding on the site to establish the root protection areas. This is evidenced in the submitted Arboricultural Tree Survey Report.
- 6.63 The report notes no more than 20% incursion of the RPA of the protected Eucalyptus tree would result. The report concludes the overall impact on the trees is low with the removal of 1 Holly and 1 palm recommended to facilitate the proposal.
- 6.64 Tree protection fencing has been recommended to ensure short and long term retention is achieved, with boundary features retained to act as protection fencing. Ground protection is also recommended to mitigate part of the access falling within the RPA of T06 and a site specific method statement (SSMS) for the development. On the basis of the Arboricultural report and subject to the recommendations therein, the proposal would afford protection to existing trees, with supplementary landscaping secured by way of condition.

**BIODIVERSITY**

- 6.65 The scheme is accompanied by a Preliminary Ecological Appraisal (PEA) prepared by Wenman Associates. This concludes the proposal would not adversely impact on any identified ecological interest with recommendations included.
- 6.66 The PEA further concludes that the development provides opportunities for the enhancement of the site's biodiversity value to help achieve a biodiversity net gain. It notes that the inclusion of the following recommendations would be of ecological benefit and be in line with the National Planning Policy Framework (NPPF), local planning policies:
- Use of hedgerows and/or open fencing to facilitate the movement of wildlife such as hedgehogs, or alternatively create 13cm x 13cm holes in timber panel

fencing with 'hedgehog highway' signs to maintain ecological permeability across the site;

- New shrub and tree planting, making use of native plant species of local provenance incorporated into the landscaping scheme;
- Installation of integral bat roost and bird nest boxes into the proposed residential dwellings

These recommendations and enhancements can be secured by way of condition.

- 6.67 It has therefore been demonstrated that the proposal would comply with relevant development plan policies and the advice of the NPPF in relation to biodiversity and ecology interests.

#### **TRANSPORT AND PARKING**

- 6.68 Policy LP45 of the Local Plan states the Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimizing the impact of car based travel.

- 6.69 The application is accompanied by a Highways Technical Note prepared by Motion. This concludes:

- the site is situated in a sustainable location which leads to easy access of amenities such as healthcare facilities, shops, and leisure opportunities via non-car methods of travel;
- The proposed number of car and cycle parking spaces on-site complies with the 2021 London Plan;
- Appropriate provision is made for refuse collection and emergency access; and
- The level of vehicular trips generated from the proposals will be negligible.

- 6.70 The Technical Note includes vehicle tracking information and demonstrates that the development is acceptable in transport terms and accords with the local and national policies in this regard. Overall, the assessment work demonstrates that there would not be any significant harm arising from the proposed scheme and it will not cause any severe impacts.

#### **SUSTAINABILITY**

- 6.71 Policy LP20 requires new development to minimize energy consumption and impact of overheating. Policy LP22 requires new homes to achieve 35% reduction in carbon dioxide emissions and 'zero carbon standards from 2016 Building Regulations. 110l per person per day is required in relation to water consumption (105l excluding external use).

- 6.72 The application is accompanied by an Energy Statement, SAP calculations and water use calculations. This evidence demonstrates that the development will achieve the required 35% reduction in carbon emissions and meet water use requirements. The development has been shown to be compliant with Policies LP20 and LP22 of the Local Plan.

**AFFORDABLE HOUSING**

- 6.73 Policy LP36 of the Local Plan requires contributions to affordable housing from all small sites, subject to negotiation on individual schemes, having regard to strategic borough-wide target and the individual circumstances of the site.
- 6.74 For schemes under the threshold of 10 or more units gross, a financial contribution to the affordable housing fund commensurate with the scale of development is required. In this case, the 3no.unit scheme would attract a contribution equivalent to 15% provision. The policy goes into state that where a reduction in affordable housing contributions is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximizing affordable housing.
- 6.75 This application is accompanied by an Affordable Housing Commuted Sum Calculation & Viability Report which demonstrates the scheme cannot withstand any financial contributions towards affordable housing. This report is submitted confidentially and the applicant accepts it will be independently audited by the Council and undertake to meet the costs for such.
- 6.76 Accordingly and having regard to the evidence submitted, the scheme is compliant with Policy LP36.

**FIRE SAFETY**

- 6.77 Policy D12 of the London Plan (2021) deals with fire safety. In accordance with the objectives of this policy, a Fire Safety Strategy is included as part of the submission to demonstrate how fire safety has been carefully considered and that the safety of future occupants is protected in this regard.

**FLOOD RISK**

- 6.78 The site is located within Flood Zone 1, is not a 'major' development and the site does not exceed 1ha. Accordingly, in accordance with the NPPF neither the sequential or exception test need to be addressed and the proposal is compliant with Policy LP21 of the Local Plan.



**SUSTAINABLE DEVELOPMENT**

- 6.79 Having regard to the information submitted, it is concluded when the application proposal is assessed against the three objectives for achieving sustainable development set out in para. 8 of the NPPF, it meets the requirements as set out below:

*Economic Objective*

- 6.80 It is an objective for the planning system set out in the NPPF to help to build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth. The proposed development will contribute towards the provision of high-quality housing in a place of identified need and will support the local construction industry.

*Social Objective*

- 6.81 The proposed development would support a vibrant local community by providing three units of well-designed housing which will meet the needs of this and future generations and which will contribute towards the creation of a well-designed and safe built environment, in a sustainable and accessible location.

*Environmental Objective*

- 6.81 The development makes effective use of land and will, through the retention and enhancement of all boundary planting and careful landscaping within the site contribute towards local biodiversity and enhance the ecological value of the site. The properties have been designed to reduce carbon emissions by more than 35% over Building Regulation requirements and electric charge points are included. Heritage assets are protected.
- 6.82 It's clear that the proposal contributes towards meeting each of the 3 objectives for achieving sustainable development and no harm has been identified that would outweigh the presumption in favour of development.

## **7.0 CONCLUSIONS**

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. This approach is supported by the National Planning Policy Framework (NPPF).
- 7.2 In considering whether to grant planning permission with respect to any buildings or other land in a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention be given to the desirability of preserving or enhancing the character or appearance of the Conservation Area. In this context, “preserving” means not generating harm.
- 7.3 The proposed development of a vacant site has been shown to cause no harm to the character or appearance of the Conservation Area, thus preserving its significance and special character.
- 7.4 The design has shown respect to the spatial arrangement of development in the area and would not be tantamount to an overdevelopment of the site. The scheme comprises good design, a key component of sustainable development and would deliver high quality family housing, causing no harm to the character of the area. The design embraces sustainable design and construction techniques.
- 7.5 The siting, scale and design of the proposal ensures no adverse impacts on residential amenity would result. Each property would benefit from good levels of amenity.
- 7.6 There are no highway safety or tree implications, and the development will provide a net-gain in biodiversity, all of which can be secured by way of condition.
- 7.7 Overall, it is concluded the scheme is policy compliant and permission should accordingly be granted.