



TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Planning Statement

**FULL APPLICATION FOR THE ERECTION OF ONE DETACHED
VILLA COMPRISING TWO SEMI-DETACHED DWELLING
HOUSES at**

Rear of 35 Twickenham Road, Teddington, TW11 8AH

PREPARED BY

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1.0 INTRODUCTION

1.1 This statement has been prepared in support of a full planning application for the erection of one detached villa comprising two semi-detached dwelling houses with associated parking and landscaping. This follows a positive pre-application submission for a similar scheme, which has been amended following advice from the Council's planning officers.

1.2 Paragraph 69 of the National Planning Policy Framework 2021 (NPPF) states that:

"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: support the development of windfall sites through their policies and decisions - giving great weight to the benefits of using suitable sites within existing settlements for homes".

1.3 The statement describes the site and proposal and sets out how the proposal complies with the policies and guidance as set out in the National Planning Policy Framework, the London Plan and the Development Plan for London Borough of Richmond upon Thames. We therefore suggest that planning permission should be granted.

2.0 SITE AND SURROUNDINGS

2.1 The site comprises a corner plot to the rear of 35 Twickenham Road with the frontage onto Manor Road. The site formally housed the garages (demolished in August 2019) to the adjoining block of flats but has been vacant for some years. To the side of the site is an informal access road leading to the rear of Twickenham Road properties. Opposite the house on the opposing corner is a grand pair of villas with accommodation over 4 levels from lower ground up to accommodation in the roofspace (nos. 28 and 30 Manor Road).

- 2.2 The site is not located within a conservation area, although there are several surrounding Buildings of Townscape Merit (BTM). The Teddington Lock Conservation Area is adjacent, as shown below:



- 2.3 The site is in flood zone 1 (low probability of flooding) but is within a site with “Potential for groundwater flooding of property situated below ground level”. However, the site is in an area Susceptible to Groundwater Flooding. The site is in a Critical Drainage Area. The site is located in a Main Centre Buffer Zone which does not have to apply the Sequential Test (for Flood Risk) as set out in Local Plan policy LP21.
- 2.4 The neighbouring block of flats at No.35 Twickenham Road is a 1960s style development with a communal garden separating the apartment block from the site with habitable windows look directly over the site.
- 2.5 The terrace of four storey houses adjacent (37-49 Twickenham Road) are designated Buildings of Townscape Merit (BTMs). Nos. 28 and 30 Manor Road and 25-45 Manor Road, the large detached dwellings to south and west are also designated BTMs.
- 2.6 The site is not within one of Richmond’s five main centres so family housing developments are preferred.
- 2.7 The site has a Public Transport Accessibility Level (PTAL) of 2 (Poor).

2.8 The area is residential in nature in walking distance to the River Thames.

2.9 Photographs of the site and surroundings are submitted alongside this statement.

3.0 PLANNING HISTORY

3.1 Ref. 17/0788/FUL – 8 January 2018 – Permission granted for demolition of lock up garages to provide one detached 4-bedroom dwellinghouse with associated undercroft parking, cycle and refuse stores, new boundary fence and hard and soft landscaping as shown below:



3.2 Note: This application was approved prior to the Teddington Lock Conservation Area being expanded (in 2019) to include the adjacent property (37 Twickenham Road) and prior to the current London Plan and NPPF which seeks highly sustainable development and making best use of sites for housing.

Pre-application advice

3.3 On 30th August 2022, a pre-application response was received by the LPA for a similarly designed scheme. The advice was as follows:

1. There is no in principle objection to the change of use of this site to accommodate a residential scheme.

2. The traditional villa design approach is to be continued however the roof form of the northern section is to be simplified. It is noted that the development will be slightly taller than the consent however it will remain lower than the neighbouring BTM of 28 Manor Road. Overall, it is considered that the proposals maintain the broad principles of the 2017 permission (17/0788/FUL) and the design and form are not out of character with the setting of the CAs and the BTMs. Ultimately, the proposals will improve the appearance of the site, removing areas of hardstanding which makes for a rundown appearance in the setting of the CA and introducing a traditional built form of a character in keeping with the area.
3. A reduction in height and overall bulk and mass is recommended to avoid neighbour amenity impacts. Additionally, a daylight sunlight assessment is recommended with particular attention paid to the impact of the proposal on the rear windows of adjacent property No. 35. **NB. These points have been addressed in this submission.**
4. Whilst family accommodation is welcomed, it is questioned whether it is necessary to have 1 x 3 bed and 1 x 4 bed unit on a plot of this scale. This could result in a compromise in living standards both for the occupants of the property itself and surrounding neighbours.
5. The Council will seek the maximum reasonable amount of affordable housing
6. Any future proposal should show how the amenity space would be divided up between units and any measures to make this a high quality usable space in line with LP35.
7. The PTAL score for the site is 1b - 2. Given each property would have 3 bedrooms or above.
8. London Plan (2021) policy T6 has an upward target of 1 - 1.5 parking space per dwelling. A minimum of two secure, covered cycle spaces.
9. The applicant must submit a detailed Construction Management Plan for the project.

10. The applicant should provide an external ground floor layout drawing detailing these and the position of bin stores.

11. A Flood Risk Assessment is required as part of the proposal, especially given the proposal set down at the ground floor. This should demonstrate the proposal will not cause any surface water/ground water/ drainage flood risk and show how the scheme incorporates sustainable urban drainage systems.

12. With regards to Ecology, any future planning application would need to include the following to the development is able to ensure a biodiversity net gain and would not cause adverse harm to protective species.
 - Current/proposed sqm figures of soft landscaping, including species & maintenance
 - Preliminary Ecological Appraisal and bat/protected species surveys (done at the correct time of year for protected species)
 - Details of external lighting including light spillage diagrams given the site is valuable for bat foraging
 - Biodiversity net gain proposals including type, spec, proposed location and maintenance

13. A Fire Safety Statement would need to be prepared.

14. A CIL form should be submitted with any future application. However, £53,737.82 CIL payment was paid on 13 May 2021 for this site and when Mr Foster Kenny purchased the site it was on the understanding that this would pass on as the new owner. The Council responded by stating that any CIL paid in respect of a chargeable development can be carried over by way of abatement (CIL Regulation 74A and 74B). Providing the party that is liable to pay the CIL charge in respect of the new development can evidence that a previous payment has been made, the Council can offset any CIL paid against the new CIL charge associated with the revised proposals.

4.0 PROPOSAL

- 4.1 The proposal would be for a pair of houses with the front dwelling set over 4 storeys with a hipped roof and the second dwelling being a much lower property with a flat roof, both with gardens, bike and bin storage. Space available for one off-street parking space for each house is provided at the front and side of the properties. A bin store to facilitate both houses is to the front/side of House 1. Both houses would comply with the national space standards covering a similar site coverage to that approved in 2018.
- 4.2 The detailed Design and Access Statement provides more information on the proposal, including use of Dark clay tile roof, Pale Flemish bond brick walls, Stone walls detailing and Dark windows/detailing. The flat roof of House 2 will be a green roof.

House 1: Four bedroom family dwelling house:

- Entrance and hallway – ground floor
- Main reception, secondary reception & study – ground floor
- Kitchen, dining, informal reception – lower ground floor
- Principal bedroom – first floor
- 3 double bedrooms – first and second floors
- Family bathroom – first floor
- Guest W.C. – lower ground floor
- Storage, including allowance for external bike and bin store.
- Utility – lower ground floor
- Garden

House 02: Three bedroom family dwelling house

- Entrance and hallway – lower ground floor
- Main reception – lower ground floor
- Kitchen, dining area – lower ground floor
- 1 double bedroom – ground floor
- 2 Single bedrooms – ground floor
- Family bathroom – ground floor

- Shower room – lower ground floor
- Storage, including allowance for external bike and bin store.
- Garden

5.0 PLANNING POLICY

5.1 The development plan comprises the Richmond upon Thames Local Development Local Plan (July 2018) and the London Plan (2021). The National Planning Policy Framework (NPPF) from 2021, the National Design Guide (2019) and the Hampton Wick and Teddington Village Planning Guidance (2017) are also material considerations.

National Planning Policy Framework 2021 (NPPF)

- 5.2 The NPPF requires, at section 12, high quality buildings and beautiful design which is key aspect to sustainable development. Paragraph 130 states that development should be visually attractive as a result of good architecture and layout and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
- 5.3 Paragraph 60 sets out the overall thrust of the planning policy approach towards housing provision at a national level has been to boost significantly the supply of housing. The Framework gives a clear and concise statement of Government policy on the matter of housing supply, stating that it is “important that a sufficient amount and variety of land can come forward where it is needed, that the needs of specific housing requirements are addressed”.
- 5.4 Paragraph 134 states that significant weight should be given to: “outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”.

National Design Guide

- 5.5 This states, at Paragraph 51, that well-designed buildings and spaces:
- i. have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion;
 - ii. have a character that suits the context, its history, how we live today and how we are likely to live in the future; and
 - iii. are visually attractive, to delight their occupants and other users (our emphasis).

London Plan

- 5.6 The main London Plan policies applying to the site are:
- Policy GG2 Making the best use of land
 - Policy D4 Delivering good design
 - Policy D6 Housing quality and standards
 - Policy D12 Fire Safety
 - Policy H2 Small sites
 - Policy SI 3 Energy infrastructure
 - Policy SI 13 Sustainable Drainage
 - Policy T6.1 Residential parking

Richmond upon Thames Local Plan

- 5.7 The policies which are relevant to this proposal are:
- i. LP1 Local Character and Design Quality
 - ii. LP4 Non-Designated Heritage Assets
 - iii. LP 8 Amenity and Living Conditions
 - iv. LP 10 Local Environmental Impacts, Pollution and Land Contamination
 - v. LP 15 Biodiversity
 - vi. LP 20 Climate Change Adaptation
 - vii. LP 21 Flood Risk and Sustainable Drainage
 - viii. LP 22 Sustainable Design and Construction
 - ix. LP 24 Waste Management

- x. LP 34 New Housing
- xi. LP 35 Housing Mix and Standards
- xii. LP 36 Affordable Housing
- xiii. LP39 Infill, Backland and Back garden Development
- xiv. LP 44 Sustainable Travel Choices
- xv. LP 45 Parking Standards and Servicing

6.0 PLANNING CONSIDERATIONS

6.1 The main issues for consideration are as follows:

- 1) The principle of development
- 2) Housing Mix
- 3) Affordable Housing
- 4) The impact on the character and appearance of the area
- 5) The impact on neighbour amenity
- 6) The standard of the accommodation
- 7) The impact on trees and biodiversity/ecology
- 8) Parking
- 9) Sustainable design and construction
- 10) Flooding and drainage

1) Principle of new housing

6.2 The National Planning Policy Framework sets out a presumption in favour of sustainable development and advises Councils to take a positive approach to delivering new homes. The NPPF also attaches great importance to the design of the built environment stating that developments should be visually attractive as a result of good and beautiful architecture. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

6.3 London Plan 2021 policy GG2 Making the best use of land states the following:

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

- enable the development of brownfield land... and sites within and on the edge of town centres, as well as **utilising small sites***
- proactively explore the potential to intensify the use of land to support additional homes, promoting higher density development*
- applying a design-led approach to determine the optimum development capacity of sites*

- 6.4 Policy H2 of the London Plan 2021 states that boroughs should pro-actively support well-designed new homes on small sites through planning decisions in order to significantly increase the contribution of small sites to meeting London's housing needs as well as to diversify the sources, locations, type and mix of housing supply. The policy also notes that boroughs should recognise that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites.
- 6.5 The area of land proposed for the new dwellings is a vacant site with part hardstanding. The proposed new dwellings would be slightly larger than the approved extant scheme but the redevelopment of this section of land is in the spirit of the London Plan policy direction.
- 6.6 As such, it is considered that the London Plan supports incremental intensification in the form of infill development in this location, given that it would result in net additional housing provision.
- 6.7 Local Plan Policy LP35 requires development to generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location. The scheme is an infill development and therefore its acceptability will be determined against the principles of policy LP39. Notwithstanding this, the site would be acceptable in principle for residential development given the existing residential nature of the area. This acceptability is subject to compliance with the policies set out above and further discussed below.

2) Housing Mix

- 6.8 Policy LP35 of the Local Plan details that 'Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location'.
- 6.9 The area is outside of one of the main centres, the 4 bed and 3 bedroom family dwelling houses are compliant with Policy LP35. The pre-application response from the LPA was concerned about the number of bedrooms proposed on this space. However, the Residential Space Standards document supporting this application demonstrates that all the rooms meet or exceed the national standard.

3) Affordable Housing

- 6.10 In accordance with Policy LP36, as this proposal seeks the provision of 2no. dwellings, the Calculation of the Commuted Sum for the provision of Affordable Housing off-site has been provided with this application, as required by the affordable housing policy. A supporting viability assessment is also provided which concludes that the building would be unviable if such payment was required and therefore a contribution should not be requested by the Council. Ongoing negotiations between the applicant and the LPA are required on this issue.

4) Impact on Character and Appearance

- 6.11 Section 12 of the NPPF advocates good design and specifies that development should be visually attractive as a result of good architecture, layout and appropriate landscaping. Local Plan Policy LP1 requires all development to be of a high architectural and urban design quality. The National Design Guide (NDG) 2019 states "Well-designed places, buildings and spaces are visually attractive, to delight their occupants and other users". We consider that the proposal complies with this national guidance. The proposal would result in a high quality building fit for the 2020s designed by a chartered architect. It is sensitively

designed with regard to its layout, height, massing, fenestration, and the choice of finishing materials.

- 6.12 The Design and Access Statement from the chartered architects, Flower Michelin Architects concludes that:

Great care has been taken in researching current policy, reviewing past planning applications as well as analysing the site and its context to develop the submitted proposal. As a result, the developed proposal recognises and responds to the site and the surrounding context; featuring appropriate massing and scale to the neighbouring buildings. The consideration of material choice and detailing in particular ensures that the proposed construction retains the character of the typology whilst offering a contemporary aesthetic without pastiche.

- 6.13 The architects have designed the properties having taken their cues from the historic buildings which neighbour the site. This has inspired the form, proportions, mass and arrangement of our proposal, whilst a contemporary use of material, detailing and spatial design has been implemented so as to not imitate the period architecture. The key elemental features of the neighbouring villas which has inspired the proposal on this site include: Hipped roof, exaggerated eaves and corbelling, varied language of openings, strong horizontal datums, simplified protruding bays and elevated entrance level. This has resulted in a building which fits neatly into the streetscene and would be an improvement on the previously granted scheme (which has been partially implemented).



- 6.14 The pre-application response concluded that “the development will be slightly taller than the consent however it will remain lower than the neighbouring BTM of 28 Manor Road.

Overall, it is considered that the proposals maintain the broad principles of the 2017 permission (17/0788/FUL) and the design and form are not out of character with the setting of the CAs and the BTMs. Ultimately, the proposals will improve the appearance of the site, removing areas of hardstanding which makes for a rundown appearance in the setting of the CA and introducing a traditional built form of a character in keeping with the area". It is considered that the same conclusion should be made for this proposal, which is similar to that submitted at pre-application stage.

6.15 Policy LP 39 "Infill, Backland and Backgarden Development" is relevant to this application, as set out below:

"All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:

1. Retain plots of sufficient width for adequate separation between dwellings – **complies – the plot is remaining at the same size as existing allows for wide gaps between the existing neighbouring buildings.**
2. Retain similar spacing between new buildings to any established spacing – **complies – the spacing is similar to that approved under ref. 17//0788/FUL**
3. Retain appropriate garden space for adjacent dwellings – **complies – the garden space for adjacent dwellings is not affected by this proposal.**
4. Respect the local context, in accordance with policy LP 2 Building Heights – **complies – the height of the house is slightly lower than the adjoining dwellings.**
5. Enhance the street frontage (where applicable) taking account of local character – **complies – the existing vacant site provides a negative contribution to the character of the area whilst the proposed building picks its design cues from other houses in the street and is wholly in keeping with local character**
6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality - – **complies – the architects have designed a building with a Victorian style to wholly fit into this streetscene.**
7. Retain or re-provide features important to character, appearance or wildlife, in

accordance with policy LP 16 Trees and Landscape – **complies – there are no trees to be affected.**

8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions – **complies – there would be no harm to residential amenity as set out further below.**

9. Provide adequate servicing, recycling and refuse storage as well as cycle parking – **complies (as shown on the plans).**

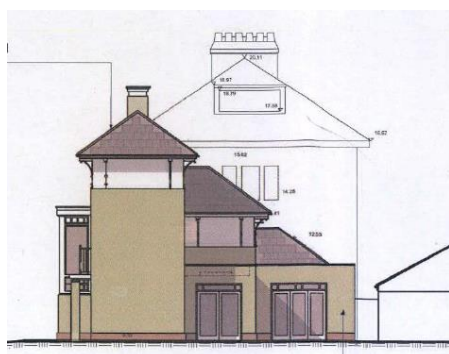
10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking – **complies –there is no objection to the parking layout.**

- 6.16 In terms of its scale and mass, the proposed building is considered appropriate has been designed to respond to the existing building line and to achieve a building which sits comfortably within its plot between the existing neighbouring housing by picking up on certain architectural features, incorporating a palette of materials found locally. As such, the materials and general design attempt to take their cue from nearby properties, the roof form would reflect the scale and appearance of neighbours and the slope, overall height and form of the roof directly reflects the established built form.
- 6.17 This property would provide a well-considered and well-designed structure that would respect local character and that of the neighbouring conservation area and locally listed buildings. The garden, car-parking, bin and bike store provision would be policy compliant, and the proposed new houses provides a considered well-designed scheme, with the proportions designed to fit with the street and which would significantly enhance the appearance of the site, which is a vacant site with scrub.
- 6.18 The resulting development is considered to relate well to the character and appearance of the street and the scale, bulk and mass of the proposed building, would have a positive impact on the character and appearance of the area generally. The development is therefore in accordance with the aims and objectives of the NPPF and Local Plan, particularly policies LP 1 and LP 39 of the adopted Local Plan; and the 'Design Quality'

(2006), 'Small and Medium Housing Sites' (2006) and 'Residential Development Standards' (2010) Supplementary Planning Documents.

5) Impact on Neighbour Amenity

- 6.19 Policy LP8 of the Local Plan advises that all development is required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.
- 6.20 The DAS sets out the tests which were undertaken to ensure that there would be no visual harm to the neighbouring block of flats at 35 Twickenham Road. The proposed bulk has been reduced from that at pre-application stage to ensure the rear element of the building is reduced and now includes a flat-roofed lower building so the outlook would not be harmed for those living in the adjoining block of flats. Due to the distances to other residential properties, there would be no harm to other neighbours from this proposal. The proposed dwelling would be 12.5m from the adjoining windows within 35 Twickenham Road.
- 6.21 The application is also supported with a Sunlight/Daylight assessment from Richard Staig which demonstrates that there would be no loss of light to neighbouring residents.



Previously approved side elevation



Proposed side elevation

- 6.22 The approved scheme from 2018 confirmed that "the width of the taller element when viewed from the garden area is considered to have resulted in an acceptable relationship

in with regard to overbearing impacts". The same conclusion should be made for this application.

- 6.23 As set out above, the proposed development would not lead to significant visual intrusion, excessive overlooking, privacy or daylight and sunlight implications when it comes to impact on the nearest neighbouring occupiers, in compliance with Policy LP8.

6) Standard of Accommodation

- 6.24 The London Plan advises that housing should be of the highest quality internally and externally and must adhere to the internal space standards set out in table 3.1 of the Plan. A separate Residential Standards statement has been prepared that will address the accommodation proposed and demonstrate that it complies with the national, regional and local space standards.

7) Impact on Biodiversity and Ecology

- 6.25 The proposal does not require the removal of any trees. There would be an increase of soft landscaping rather than a reduction. A Preliminary Ecological Appraisal has been undertaken. The conclusions are that the site survey revealed the following habitats:
- Hardstanding;
 - earth mounds with ruderal vegetation; and
 - sparse bramble.
- The site is not subject to any statutory or non-statutory designations. The closest statutory site is Ham Lands LNR which is located approximately 270m to the northeast at its closest point and the survey area does not support any features that contribute to the designation of this site.
- No further protected species surveys are recommended for the site. Protected species are not considered to pose a constraint to the proposed development.
- It has been recommended that the buddleia is removed from the site.
- It has also been recommended that the site is enhanced by introducing some compensatory planting and installing bat and bird boxes.

- 6.26 A Biodiversity Net Gain Assessment has been carried out concluding that an overall net gain of 2,292.03% in habitat units from the existing baseline has been calculated. It should be noted that the BNG assessment does not capture other methods of ecological enhancement such as the inclusion of bat and bird boxes. It is recommended that the proposed development is carried out in accordance with the recommendations made within the Preliminary Ecological Appraisal that was carried out for the site by Phlorum.
- 6.27 Biodiversity net gain and ecological enhancements include a green roof on the garden room, bee and butterfly friendly plants and bat and bird boxes. Overall, this would enhance biodiversity on the site, complying with policies LP15 and LP16 of the Local Plan.

8) Transport and Parking

- 6.28 Policy LP44 and LP45 of the Local Plan states that it is necessary to consider the impact of any new development on the existing wider and local transport network and that development will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. The maximum parking standards contained within the London Plan will be expected to be met, unless it can be shown that in proposing levels of parking applicants can demonstrate that there would be no adverse impact on the area in terms of street scene or on-street parking.
- 6.29 The proposed dwelling-houses with associated hard and soft landscaping, cycle and refuse stores and parking. The following is relevant to this site:
- The site is located in an existing residential area, close to local facilities including shops, cafes, restaurants and public open space;
 - The site is accessible by public transport (close to several bus stops), although it only has a PTAL rating of 1b-2;
 - Car and cycle parking is provided at a level that fully accords with relevant parking standards – bikes will be parked in the secure bike storage fronting both properties; and

- Any increase in trips to and from the site as a result of the proposed development would be negligible and would have no effect on the operation of the local transport network.
- There are two 2 off-street parking spaces proposed in line with policy requirements and there would be no requirement to park the vehicles on the road. Considering Manor Road is not a classified road, there is no safety requirement to exit the site in a forward gear.
- Electrical car charging point
- Bins are shown on the ground floor plan as being located at the side of house 1 for both houses.

6.30 The proposal is therefore considered to policy compliant and would not cause any adverse impacts upon the highway network. A construction management plan pro-forma is to be submitted with the application.

9) Sustainable Design and Construction

6.31 Policy LP22 of the Local Plan stipulates developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. The policy requires development to be supported by a Sustainable Construction Checklist and a 35% reduction on carbon dioxide emissions.

6.32 A sustainable construction checklist and Energy Assessment are submitted with this application. The conclusions are as follows:

“A highly optimised energy strategy based on passive design, building fabric performance and building services systems and controls as well as the installation of ASHPs and PV panels will allow the scheme to achieve an improvement over the baseline scenario of approximately 59%, exceeding the planning policy target of 35%”.

10) Flooding and sustainable urban drainage

6.33 The site is located within Flood Zone 1. 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. However, the site is in an Area Susceptible to Groundwater Flood and therefore a statement has been provided which addresses the groundwater and surface flooding.

- 6.34 The Flood Risk Assessment and Surface Water Drainage Strategy from Aegaea considered the potential risks to the application site associated with flooding from fluvial, tidal, surface water, artificial and groundwater sources and the potential impacts of climate change.
- 6.35 The conclusions that the lower ground floor level is constructed from solid, waterproof materials and is adequately tanked to limit the potential for groundwater ingress.
- 6.36 A National Water Statement is also submitted from Aegaea which concludes that The WEC calculated in accordance with Building Requirement Part G shows that the each of the proposed new dwellings achieve a wholesome water consumption of 105.69 litres/per person/per day including the 5 litres per person per day for external use. This is less than the maximum water consumption 110 litres per person per day and thus satisfies the requirements set out by the Richmond Borough upon Thames Sustainable Checklist and Local Plan 22 – Part A -Criterion 2.

7.0 OVERALL CONCLUSION

- 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). The NPPF also states that good and beautiful design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. It is sustainable development of good design that will contribute positively to making the new replacement dwelling better for future families which is significantly more sustainable in terms of its energy demand.

7.2 The proposal to build two new dwellings on this vacant site is wholly acceptable and would accord with National policy which promotes sustainable well-designed development. The design is of the upmost highest standard from chartered architects Flower Michelin and the proposal sits comfortably within the plot and takes its cues from that of many other houses in the street. There would be no harm to the character or appearance of the neighbouring heritage assets.

7.3 In summary, we consider that the proposal would be acceptable for the following reasons:

- Provision of well design sustainable family sized homes in a sustainable location in a residential area
- The height of the building is in keeping with the neighbouring buildings to ensure it doesn't harm the character and appearance of the street scene
- The design is of the highest standard and replicates the BTMs adjoining and opposite while respecting the traditional houses on Manor Road
- The design would improve the visual appearance of this part of Manor Road providing an exemplar building on this corner plot and is an improvement on that already granted planning permission
- There would be no demonstrable harm to neighbouring residents
- There would be sufficient garden space
- There would be sufficient space for bikes and bin storage
- There would be sufficient space to the boundary so the houses would not appear cramped or an over-development
- There would be limited overlooking and loss of privacy.
- The application is supported with documents including an Energy Statement, Sustainable Construction Checklist, viability assessment, Residential standards statement, Ground water drainage strategy, Biodiversity Net Gain and Preliminary Ecological Appraisal, National Water Statement, Community Infrastructure Levy and Fire Safety Statement.

7.4 Overall, the scheme is considered to be fully policy compliant, and we respectfully request that permission is granted.