



The Boathouse Twickenham Ltd

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**THE BOATHOUSE, TWICKENHAM,  
TW1 1QZ**

Planning Statement



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## Planning Statement

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## EXECUTIVE SUMMARY

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1. This application is a resubmission (LPA ref. 22/3017/FULL) for the redevelopment of an existing residential building which is in a state of disrepair and detracts from the character and appearance of the area. The proposal includes the provision of three high quality residential family dwellings which comply with policy requirements. The proposal also includes a landscaping scheme which complements and enhances the surrounding area, including the expansion of the public walkway by up to 1m along the River Thames. Furthermore, a new area for the public is also proposed within the proposal.
2. The site is currently in use as three C3, residential dwellings. Dwelling 1 was recognised within the planning officers report, relating to LPA ref. 09/2459/FUL, *“on balance of probability, they were satisfied that the change of use had occurred 4 years before the date of their assessment (11/06/2014)”*.
3. Dwelling 2 and dwelling 3 were acknowledged to be in residential use via a Certificate of Lawful Existing Use (LPA ref. 19/0141/ES191). The officers report (LPA ref. 19/0141/ES191) relating to the residential use of dwelling 2 and dwelling 3 stated that the dwellings have interchanged between C3 and C4 use, this interchange was considered immaterial. Furthermore, the officers report states that *“the Council are satisfied that both dwelling 2 and 3 have been in continuous use as C3 or C4 uses over 4 years”*. The units have since been in use as individual C3 dwellings and remain in this use.
4. Therefore, the planning history and current tenancy circumstances recognise that all three existing residential dwellings are currently and continue to be in C3 residential use.
5. This application is a resubmission of planning application LPA ref. 22/3017/FUL. The application, submitted in October 2022, was withdrawn in response to the objection held by London Borough of Richmond upon Thames (LBRuT) and comments received from the Environment Agency (EA) and Historic England (HE).
6. This application is submitted and has addressed the comments received by LBRuT, EA and HE. In short, the proposal will provide a high-quality scheme which enhances the conservation area whilst preserving the setting of the heritage designations and the openness of the MOL. Other benefits from the scheme include the following:
  - Demolition of a building of substandard quality and harms character of the surrounding area and conservation area.
  - The proposal will provide three new, high quality and carefully designed family sized dwellings.
  - The proposed family sized dwellings have been designed with consideration to the character of the surrounding area and are sympathetic to sites locality within the conservation area.
  - Significant improvements to the public realm, including widening of the existing Thames walkway. This would create a much safer, attractive public realm space for the enjoyment of residents and the public and encourage active modes of transport such as walking and cycling.
  - Although outside of the planning application, the mooring will be repaired and improved, where necessary to be used by the future residents as well as rented out by the public.

- Reference will be made to the sites historic use as a recording studio with an on-site piece of public art, an artistic vinyl inspired artwork in the ground providing information on the site's history.
  - The proposal offers a financial contribution of £100,000 towards affordable housing.
7. Ongoing engagement has been undertaken with residents and local resident groups on the amended scheme. Positive responses have been received from SMERA during the withdrawn application who supported the scheme. They have also expressed support for the amended scheme and we continue to liaise with them to get a full response on the proposals. There was one query from SMERA asking for confirmation that two wheelchair users could pass each other along the pathway. A plan was provided to SMERA confirming that two wheelchair users could pass along the pathway. Other residents have expressed support for the application and have highlighted that they support and welcome the improvements and widening of the public pathway which is a significant benefit to the public.
  8. The proposal has been positively prepared and is in line with national, regional and local planning policy.
  9. Therefore, this application should be approved by LBRuT without delay.

# 1 INTRODUCTION

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- 1.1.1. This Planning Statement (PS) has been prepared on behalf of our clients, The Boathouse Twickenham Ltd (“the applicant”), who own The Boathouse, in support of a planning application for the demolition of the existing residential building comprising of three residential flats and the erection of three pitched-roof dwelling houses and improvements to the public realm surrounding the site at The Boathouse, Ranelagh Drive, Twickenham, TW1 1QZ.
- 1.1.2. The application is submitted following pre-application discussions (LPA ref. 20/P0166/PREAPP) with LBRuT and the withdrawn planning application (LPA ref. 22/3017/FUL). This proposed scheme has been revised from initial pre-application discussions and has been shaped to thoroughly address each of the LBRuT’s, EA and HE concerns and account for comments received on the proposal at pre-application stage as well as national, regional and local policy and guidance.
- 1.1.3. This application seeks planning permission for the following:
- “Demolition of existing building and outbuildings to provide three residential dwellings including associated landscaping works, provision of parking and associated works to the public realm.”*
- 1.1.4. This PS identifies the key issues and planning policy and guidance considerations associated with the proposed development and demonstrates that the scheme complies with adopted planning policy. The application seeks to address concerns raised in respect of the pre-application scheme and the withdrawn application. The forthcoming scheme demonstrates a proposal that provides a sustainable and efficient use of the site, which will enhance the character and appearance of the site and surrounding area.
- 1.1.5. In addition to these positive planning benefits, the scheme is fully compliant with national, regional and local policy.

## 1.2 SILVER JETTY AND NOMAD DEVELOPMENTS

- 1.2.1. The development will be delivered through the partnership of Silver Jetty and Nomad Property Ltd, aiming to provide high-quality, sustainable family housing on the site.
- 1.2.2. Silver Jetty are an architecture and interior design agency with significant experience in the development and fit out sectors. Silver Jetty provide feasibility, planning, architectural, interior design, space planning and project management services to a wide range of clients in the UK.
- 1.2.3. Silver Jetty were recently awarded The Best Design Award by the Tonbridge Civic Society for two independent buildings designed for a primary school in Tonbridge, Kent.
- 1.2.3.1 Nomad Developments is a London-based Real Estate Development Company and Design Studio. Nomad Developments expertise cover multi-unit development projects, extensive renovations, and bespoke projects.
- 1.2.3.2 Nomad Developments recently delivered two Neo Georgian Townhouses, Osprey & Rosefinch House, on Richmond Riverside. Each unit extends over 350sqm delivering high quality, contemporary family housing.

## 1.3 THE SCOPE OF THE PLANNING STATEMENT

1.3.1. This PS is structured as follows:

- **Section 1** provides an introduction to the site, context and applicant;
- **Section 2** describes the application site and surrounding context;
- **Section 3** describes the background of the site;
- **Section 4** describes the pre-application advice received;
- **Section 5** sets out a detailed description of the proposed development;
- **Section 6** provides a summary of the relevant planning policy and guidance context;
- **Section 7** sets out our assessment of the planning scheme against planning policy and guidance; and
- **Section 8** provides a summary and overall conclusion.

## 1.4 OTHER APPLICATIONS DOCUMENTS

1.4.1. Alongside this PS, the following documents are submitted in support of this application:

- Application form and signed and dated ownership certificates, prepared by WSP;
- Community Infrastructure Levy (CIL) form, prepared by WSP;
- Full suite of drawings, prepared by Silver Jetty;
- Statement of Community Involvement, prepared by Planning Potential;
- Design and Access Statement, prepared by Silver Jetty;
- Financial Viability Statement, prepared by Grimshaw Consulting;
- Transport Statement, prepared by ITransport;
- Energy Report, prepared by GDM Partnership;
- Sustainable Construction Checklist, prepared by GDM Partnership;
- Arboriculture Report and Tree Protection Plan, prepared by Andrew Day Consultancy;
- Ecology Report, prepared by AAE Environmental;
- Heritage Statement, prepared by HCUK Heritage;
- Daylight and Sunlight Assessment, prepared by Schroeders Begg;
- Fire Safety Strategy, prepared by WSP;
- Basement Impact Assessment, prepared by Pringuer-James Consulting Engineers (PJCE); and
- Flood Risk Assessment and Surface Water Drainage Strategy, SLR Consultants.



## 2 SITE AND SURROUNDING CONTEXT

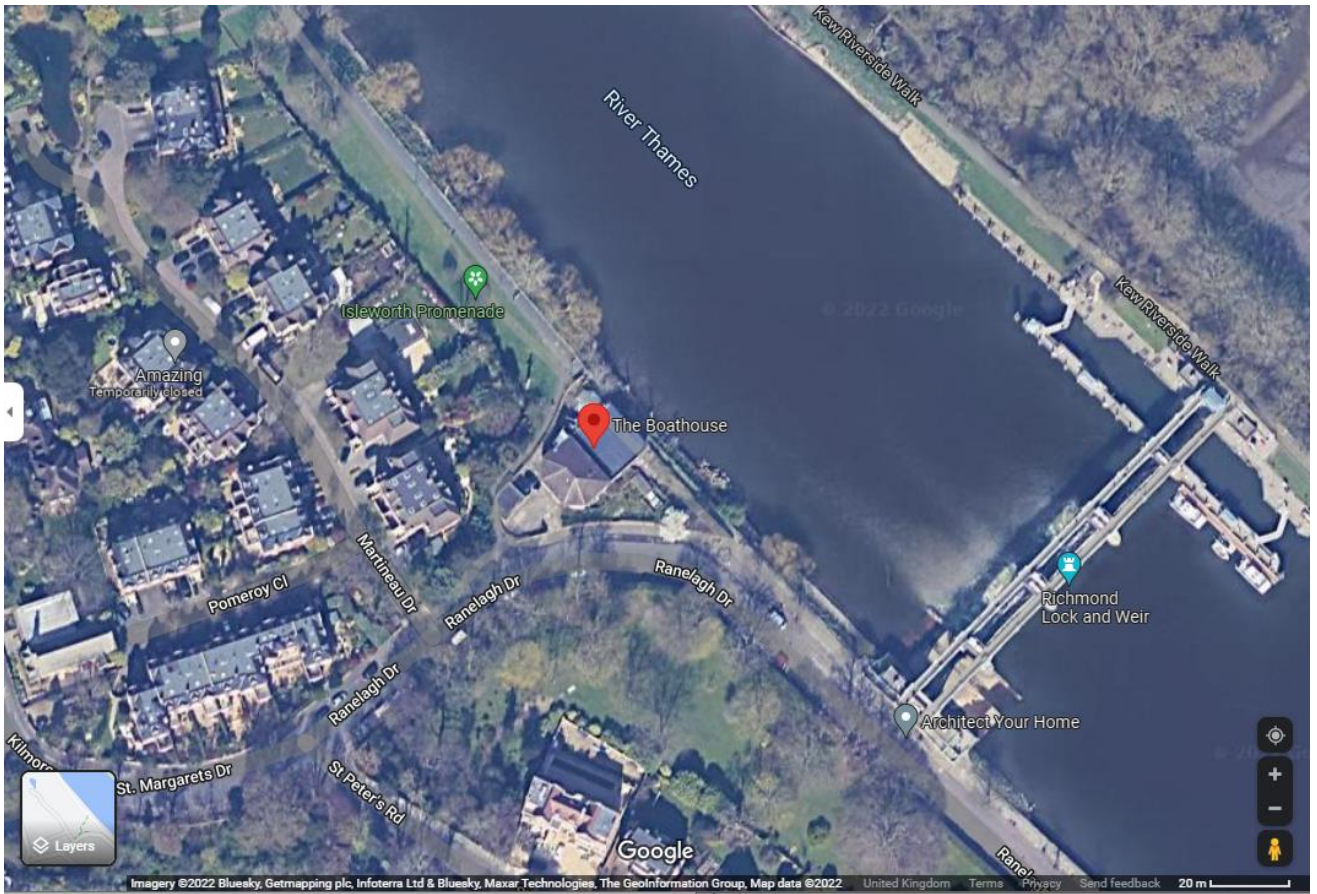
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### 2.1 THE APPLICATION SITE AND SURROUNDING CONTEXT

- 2.1.1. The application site (figure 2.1) is located within the LBRuT, within the Twickenham area of the Borough. The site is located on a corner plot to the north of Ranelagh Drive. The vehicle and pedestrian access are off Ranelagh Drive which is a local access road providing access to nearby Martineau Drive to the west, Pomeroy Close to the south and St Peters Road to the east.
- 2.1.2. The application site has an uneven topography with a sloping gradient from north to south with the lowest part of the levels on the River Thames side.
- 2.1.3. The application site includes one two/three storey detached residential building, a garage, some outbuildings including plant equipment, car parking spaces fronting onto Ranelagh Drive and surrounding overgrown landscaping. The application site is surrounded by a 1.5m high brick wall. The brick wall does break along the public walkway where steps up to the existing building are exposed. The application site also includes 1.77m of the existing public walkway.
- 2.1.4. Although not part of the application site, the site does benefit from a mooring on the opposite side of the public walkway which is accessible by the existing residents of the building and can be rented out separately by members of the public, if requested. The mooring is in a state of disrepair and therefore, the applicant will be making improvements to the mooring.
- 2.1.5. The building was formally known as “Dick Waite’s Boathouse” and was built in the late 1960s. The building was originally built for commercial purposes, storage, recording studio and residential units. The building fell into disrepair and was then owned by Pete Townshend who used the building as his recording studio called Eel Pie Recording Studios.
- 2.1.6. The building has since been split into three separate flats. Unit 2 and 3 were previously Housing in Multiple Occupation (HMO) with Unit 1 being in residential use (C3). However, Units 2 and 3 have now changed and are occupied as residential use (C3). The existing building is in a state of disrepair and requires immediate refurbishment to bring the building up to current and acceptable standards. Further details of the history of the buildings use have been provided in Section 4 of this report.
- 2.1.7. The application site is located within Flood Zone 3a. This means that there is a high probability of flooding, however, the existing building itself forms part of the flood defence. To ensure this remains as an effective flood defence, significant works need to be undertaken to the building to address the EA comments. Further details of this are set out within Section 7 of this report.
- 2.1.8. The building is not listed however, the site is located within the St Margaret’s Conservation Area. St Margaret’s Conservation Area was designated in 1971 and its boundaries were expanded in 1988 and 2005. The St Margaret’s Estate Conservation Area Study was published in 2001. Although outdated, the study provides historical context to the prevailing character of the conservation area.
- 2.1.9. Although there are no listed buildings within the application site, it is located 0.3 miles from the Grade II\* listed Richmond Lock Footbridge. Richmond Lock Footbridge can be seen whilst walking along the public walkway but is obscured by large trees growing from the River Thames side.

- 2.1.10. The application site is also located within Metropolitan Open Land (MOL). Although the site and surrounding area are subject to the strongest protection from inappropriate development, the application site is already entirely developed on.
- 2.1.11. The application site is unique for this area as the neighbouring buildings have all been set back from the public walkway and the River Thames, leaving the Boathouse in a prominent position. The surrounding area is predominantly residential in character. The principal building form in the surrounding area is four storeys in height with basement development on large residential plots.
- 2.1.12. The public walkway which fronts the application site (to the north) currently presents poor quality public space. Located adjacent to the application site, the public walkway is narrow, the paving is uneven and there are a number of other elements that make the space unsafe and impractical for use. Its relationship with the site has created opportunities for vandalism along the public walkway, with examples such as graffiti along the boundary wall facing the walkway. In its current state, the public walkway is of poor quality, offering poor views to the wider surrounding area and restricts accessibility which as a result means the walkway is not used during night hours.
- 2.1.13. The site is also in the vicinity of a number of important green spaces and parks in the surrounding area. Isleworth Promenade and Cedar of Lebanon parks are located to the west of the site. Immediately opposite the site, across the River Thames, is the Royal Botanic Kew Gardens buffer zone and the Royal Botanic Kew Gardens. The buffer zone includes a golf club and largely consists of green space.
- 2.1.14. Although the application site has a low PTAL of 1b, however does sit approximately 0.7 miles from St Margaret's Railway Station, which provides access to South Western Railway links. The application site is 0.8 miles from Richmond Station, providing links to the overground and underground services including the overground line, District Line and South Western Railway. Both Richmond Station and Richmond High Street are within walkable distance of the site.
- 2.1.15. Richmond High Street is served by a number of key amenities and facilities. There are several commercial units and leisure activities on and around Richmond High Street, as well as the key transport links. The application site, therefore, has excellent access to services and facilities.

**Figure 2-1 - The Application Site**



## 2.2 APPLICATION SITE DESIGNATIONS

2.2.1. The LBRuT Policies Map (2020) shows that the site is subject to the following designations:

- St Margaret’s Conservation Area;
- Thames Policy Area;
- Metropolitan Open Land;
- Other Site of Nature Importance (OSNI);
- Protected View Corridor; and
- Functional Floodplain – Flood Zone 3a.

## 3 PLANNING HISTORY

### 3.1 SITE HISTORY

3.1.1. The relevant planning history for this site is as follows:

**Table 3-1 – Site Planning History**

LPA Reference Number	Description of development	Decision	Date
22/3017/FUL	Demolition of existing building and outbuilding to provide three residential dwellings including associated landscaping works, provision of parking and works to the public realm	Withdrawn	13/12/2022
19/0141/ES191	Certificate of lawful development for the continued use of part of the property (excluding Unit 1) as 2 No. flats in multiple occupation for up to 6 people.	Certificate issued	21/06/2019
17/0668/ES191	Certificate of lawful development for the use of the premises as 3 separate residential units with ancillary car parking (unit 1 used as Use Class C3, Units 2 and 3 used as Use Class C4).	Certificate not issued	15/05/2017
09/2459/FUL	Retention of existing use of lower ground floor as a private recording studio and extension residential use onto part of the existing upper ground floor terrace and into the roof.	Decided as No Further Action be Taken	09/11/2012
09/2376/COU	Proposed Change of Use From A Redundant Private Music Recording Studio Into A Single Private Residence.	Decided as No Further Action be Taken	09/11/2012

3.1.2. The history outlined in the above table is expanded on in the following points below.

3.1.3. LBRuT did not issue a certificate under LPA ref. 17/0668/ES191 as the evidence that was provided within the submission package did not demonstrate that on balance of probability, the use of the premises was in three separate residential units. This only related to Unit 1.

3.1.4. Subsequently, a new application was submitted for Unit 2 and 3 (only) for a Certificate of Lawful Existing Use, under LPA ref. 19/0141/ES191. It was determined that Unit 2 and 3 were in residential use under either C3 or C4. The officer's report stated, *"it is emphasised that there has been an interchange in the use of the units between C3 and C4, given that both of these uses still constitute dwellinghouses, this interchange is immaterial"*, then goes on to state *"the Council are satisfied that both Units 2 and 3 been in continuous use as C3 or C4 uses over 4 years."* Since the certificate was issued, the use of Unit 2 and 3 have continued to interchange between C3 and C4 but are currently occupied as a C3 use.

3.1.5. Furthermore, the officer's report highlighted that an enforcement case had been opened for the *"unauthorised change of use of the property into one studio flat (unit1)"*. The officer's report confirms that the investigation was subsequently closed as the LBRuT Enforcement Officer conceded that *"on the balance of probability, they were satisfied that the change of use had occurred 4 years before the date of their assessment (11/06/2014)"*. Unit 1 continues to be in residential (C3) use.

3.1.6. In short, given the current tenancy circumstances, all three residential units are currently in use as C3 residential dwellings.

## **3.2 WITHDRAWN PLANNING APPLICATION – LPA REF. 22/3017/FUL**

3.2.1. This section provides a breakdown of the withdrawn application and the evolution of the proposal as a result of the planning application process. The process has resulted in the development submitted within this application; the various stages included and will include:

- Pre-application meetings with LBRuT (August 2020);
- Submission of withdrawn planning application LPA ref. 22/3017/FUL (October 2022);
- Responses to and from LBRuT, statutory consultees and residents;
- Withdrawal of planning application (LPA ref. 22/3017/FUL);
- Revision of proposal in line with comments received for new planning application ;
- Pre-application meeting with HE;
- Consultation with residents and residents' association; and
- Resubmission.

3.2.2. In August 2020, pre-application advice was sought for the redevelopment of the application site. LBRuT's pre-application report is attached in appendix 1 of this PS.

3.2.3. Subsequently, a planning application (LPA ref. 22/3017/FUL) was submitted in October 2022 for:

*“Demolition of existing building and outbuilding to provide three residential dwellings including associated landscaping works, provision of parking and works to the public realm.”*

3.2.4. LBRuT held an objection to the application given the proposed scale in comparison to the existing building and the sites location in the MOL and therefore the need for VSC. This was addressed with a note outlining why the site did not require VSC, this has also been addressed in Section 7 of this PS.

3.2.5. Neighbouring residents had a varied response to the withdrawn application with comments of support and objections.

3.2.6. There were attempts to address the comments and concerns raised within this application, however, LBRuT would not accept amendments to the application given their objection.

3.2.7. The application was, therefore, withdrawn in December 2022.

### **CONSULTATION RESPONSES TO LPA REF. 22/3017/FUL**

3.2.8. Details of responses from the statutory consultation period are set out below, these include responses from residents and resident groups, the EA and HE.

3.2.9. Residents from neighbouring Martineau Drive, St. Margarets Drive, Railshead Road and the Richmond Society all provided responses during the public consultation period.

3.2.10. Responses noted that the existing site was of poor condition and of no architectural merit. Furthermore, there was some support for the improvement of public spaces and accessibility of the public walkway for pedestrians and cyclists.

- 3.2.11. Concerns were raised by some residents and resident groups relating to flood risk, relationship between development and neighbours at Martineau Drive, public realm improvements and the impact of development on views within a heritage sensitive area.
- 3.2.12. These comments were and continue to be addressed during the previous application and this new planning application. These comments and our response have been detailed in the below points.
- 3.2.13. In terms of Flood Risk Assessment (FRA) and the sequential test, concerns were raised by EA and residents regarding the impact the proposal would have on flooding on the site and within the surrounding area.
- 3.2.14. The response to this concern was that our submitted FRA included a sequential test. It was outlined within the submitted assessment that the development would not change the flood vulnerability of the site or impact the neighbouring properties. Furthermore, Policy LP 34 of the Richmond Local Plan highlights Twickenham Riverside as an area for additional new housing and this is noted within the FRA. The FRA concluded that the site passes the sequential test. Furthermore, the assessment states that flood resilience of the site and effect on the surroundings will be improved.
- 3.2.15. Concerns were also raised by residents at Martineau Drive regarding the potential for overlooking.
- 3.2.16. A floorplan was provided showing the distances between the proposed building and no. 22 Martineau Drive. The closest proposed window is 26m away from the closest elevation of 22 Martineau Drive. This exceeds the guidance set out within the LBRuT Small and Medium Housing Sites (Feb 2006) which requires at least 20m in distance for a development of this nature.
- 3.2.17. The case officer stated they agree with this and had no objections to raise regarding neighbour amenity.
- 3.2.18. Objections were made in relation to the proposed riverside seating area, proposed as part of the public realm improvements. Residents felt this element would encourage anti-social behaviour.
- 3.2.19. It was proposed that this element of the proposal be removed however wanted to await further guidance before doing so. The case officer did not have any objections to the proposed public realm element and said it was the choice of the applicant.
- 3.2.20. Concerns were raised by HE regarding the impact the proposal would have on key views given the sites locality to heritage assets. To address this, additional view images were put together of the scheme. Since the withdrawal and during this resubmission, this application has gone further to address the comments previously made by HE.

## 4 PRE-APPLICATION ADVICE

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### HISTORIC ENGLAND 2023

- 4.1.1. Engagement with HE has taken place at pre-application stage for this new application (February 2023). HE's pre-application advice relates to the significance of the site and surroundings, impact of the revised proposal and HE's position and recommendations for the proposed development.
- 4.1.2. HE acknowledged the existing site is not of architectural merit.
- 4.1.3. The site is within the St Margaret's Estate Conservation Area and located near Grade II\* listed Richmond Lock and footbridge.
- 4.1.4. HE outlines the key views from the site including the Old Deer Park and part of the Kew Gardens as key considerations for any proposal on the site.
- 4.1.5. HE provided the following position and recommendations within the pre-application advice:
- HE appreciated the efforts made to reduce the overall volume of the building to date and note small heritage benefit in improving riverside views and immediate public space to the front of the site.
  - HE outlined that Building remains notably larger than the existing building on the site. The increase in breadth, height and overall prominence would still erode the sense of semi-rurality of the riverside within the conservation area.
  - Given the reduced scale compared to the previously submitted application, the harm will be reduced. HE appreciated attempts to reduce the harm of the proposal by way of heritage benefits.
  - HE also appreciated the need for the second floor however it is considered that the building would need to be closer in size to the current building, as seen from the river.
  - HE suggested two approaches such as removing at least 30% of the volume of the second storey, and further reducing the width of the ground floor, or
  - Reducing the overall width of the whole building to that of the current building and redesigning the upper storey to break it up and appear more subservient.
  - HE set out that without the changes as above or to a comparable extent, some harm will be likely to remain.
- 4.1.6. Alterations to the previously submitted planning applications have been outlined in Section 6 of this PS. The following alterations have been made since the pre-application meeting to address comments from HE:
- The first and second floors of the proposed dwellings have been reduced by 5.35m in width.
  - The depth of the building from North to South has been reduced by 1m of built form.
  - The perimeter wall has been lowered from 2.1m to 1.7m around the site.
  - The design of the wall has been terraced along the North elevation of the site, adjacent to the path, to include planting and stonework in order to enhance the sense of openness.
  - The colour of brickwork for the single element will match the lock lodges and the stone framed picture window and parapet walls area reference to the lock lodge elevations.

## ENVIRONMENT AGENCY

- 4.1.7. We have contacted the EA in order to engage with the pre-application, however, have failed to receive a response. Comments provided in the previous application consultation have been addressed within this submission.

## 4.2 COMMUNITY ENGAGEMENT

- 4.2.1. The consultation process for the redevelopment proposals has been updated to allow the local community to view the development scheme and share their feedback with the design team.
- 4.2.2. Residents and Resident Groups have been reconsulted for this application. Key stakeholders in the consultation group include The Richmond Society and SMERA.
- 4.2.3. The project team identified a suitable, updated engagement strategy commensurate to the scale of the proposed development and its likely impacts on the surrounding area and community. Specifically, the consultation has included:
- A newsletter to members of the local community stating the changes being proposed within this planning application and where to provide comments on the proposals.
  - Consultation with SMERA, whom have been more supportive of this proposal.
  - A website has been developed outlining the vision for the site, allowing residents and stakeholders to review and comment on the proposal.
- 4.2.4. As talks with stakeholders continues, a number of agreements have been made with SMERA as part of the engagement work:
- Provide a financial contribution to SMERA for the creation of a display of memorabilia, paying tribute to the site's history as a recording studio.
  - Reflecting the musical history through an on-site piece of public art.
- 4.2.5. Positive responses have been received from SMERA during the withdrawn application who supported the scheme. They have also expressed support for the amended scheme and we continue to liaise with them to get a full response on the proposals. A plan was provided to SMERA confirming that two wheelchair users could pass along the pathway. Other residents have expressed support for the application and have highlighted that they support and welcome the improvements and widening of the public pathway which is a significant benefit to the public.
- 4.2.6. Community engagement is an on-going process which will continue to develop and evolve as the application process progresses.

## 4.3 SUMMARY

- 4.3.1. The details set out in this section demonstrated that a comprehensive engagement process has been undertaken by the applicant, allowing the residents and planning officers to influence the submitted proposals. Comments received from officers, HE, EA, other key statutory consultants and residents have directly influenced the revisions that have been made to the scheme.



## 5 THE PROPOSED DEVELOPMENT

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- 5.1.1. The proposal is to demolish the existing building consisting of three separate residential dwellings, to provide one three storey building terraced style building to provide three family sized residential dwellings.
- 5.1.2. The existing building has a footprint of 593.8sqm. The change in footprint will allow the site to be maximised in terms of amenities and green space on the site whilst also retaining the number of residential dwellings provided on the site.
- 5.1.3. The new building will be elevated by 1.5m, however through a design led approach, the increase of height from the existing ridge line will be less than 1.5m. The elevation of the proposed building would allow for improved flood mitigation.
- 5.1.4. The building has been designed in response to the existing character and patterns of development in the surrounding area. The roof line has been divided across the proposed three residential dwellings with a part pitched roof and part flat roof design. The use of bay windows has taken inspiration from the lodges at Richmond Lock footbridge.
- 5.1.5. Each residential dwelling will have the following GIA:
- House 1 – 313.52sqm
  - House 2 – 273.2sqm
  - House 3 – 306.69sqm
- 5.1.6. The total GIA for the site would be 893.41sqm.
- 5.1.7. The proposed three residential dwellings will comprise of four bedrooms for eight persons.
- 5.1.8. Each residential dwelling will include a first-floor private terrace, garden area and the pathways on the site will be permeable.
- 5.1.9. The proposal will include a glass balustrade which is back from the parapet by over 3m. This allows for the proposed sedum roof to be implemented at first floor terrace level.
- 5.1.10. Each dwelling has the following floorspace of private amenity space to be delivered through a private terrace element and garden area:
- House 1: 156.22sqm
  - House 2: 53.14sqm
  - House 3: 254.78sqm
- 5.1.11. The proposal includes 257.29sqm of ground floor shared amenity space.
- 5.1.12. In terms of onsite amenities, the proposed development would include the following:
- Six car parking space, two for each proposed household.
  - Bin stores; and
  - One cycle store with six cycle parking spaces.
- 5.1.13. The boundary wall has been lowered to 1.7m around the site. The design has been altered to be terraced along the north elevation. The boundary wall fronting the public walkway will include planting and stonework in order to enhance the sense of openness across the walkway.

- 5.1.14. The proposal will also include an area of 150.51sqm for a Sedum roof to the first floor of the proposed building as well as enhanced planting around the grounds of the site.
- 5.1.15. This proposal will positively transform the site through providing a new, more sustainable and attractive residential development in line whilst enhancing the character of the conservation area and surrounding area.

### **THE RIVER WALKWAY IMPROVEMENTS**

- 5.1.16. The proposal also seeks to improve the public realm around the site, most importantly the public walkway.
- 5.1.17. The current public walkway is narrow and unwelcoming therefore, the proposal seeks to widen the existing public walkway (ie reducing the footprint of the application site). The width of the public walkway will see an increase in width between 0.82m and approximately 1m across the walkway. The walkway access to the North will be increased in width by 2.8m, providing a width of 4.22m and making the walkway more accessible to residents. The applicant will seek to achieve this by utilising land from the application site.
- 5.1.18. At the corner of the site, the proposal will create a new concaved corner facing the river and Richmond Lock footbridge, again taking additional land from the application to provide to use for public access. The design sets out to achieve a softer, more welcoming public space for local residents and will allow access to the public walkway to widen so pedestrians are able to see more of the pathway.
- 5.1.19. The proposed improvements will also include a new boundary wall with a height of 1.7m. This would include planting and stonework. This would allow privacy for future residents of the site as well as the public who make use of the public walkway. This would represent a significant improvement on the existing wall fronting the public walkway and the stairs area, which has been damaged through a mix of the wall aging and anti-social behaviour.
- 5.1.20. The proposal will seek to improve the quality of the public walkway with a safer, permeable, and more durable surface. Improving the public spaces practicality, accessibility and appearance in the area.

### **ALTERATIONS FROM WITHDRAWN APPLICATION**

- 5.1.21. The following amendments have been made to the proposal within this submission:
- All three residential dwellings are now four bedroom houses, previously five bedroom, as a result of the reduction of built form.
  - The interior layout has been changed to respond to the reduction of built form.
  - The entrance points to each dwelling have been revised to respond to the reduction in built form.
  - The first and second floors have been reduced by 5.35m in width, approximately the width of one house.
  - The depth of the building from North to South has been reduced by 1m.
  - The width of the ground floor has been reduced by 2.4m.
  - The colour of brickwork for the single element will match the lock lodges with the stone framed picture window and parapet walls using the lock lodge elevations as a reference.

- The design of the first and second floors has been enhanced to include higher quality materials including stone, bronze coated metal gable ends and glass. The elevation includes timber louvres to bind together with the timber elements of the ground floor.
  - The perimeter/boundary wall has been lowered from 2.1m to 1.7m around the site. The design of the wall has been “terraced” along the north elevation adjacent to the footpath to include planting and stonework to enhance the sense of openness.
  - With consideration to Biodiversity, the first floor terrace areas are now contained behind glass screens to allow for the flat roof to be given Sedum Roof treatment. This is done to enhance the biodiversity of the site in line with EA comments.
  - The previous application included a 1m tall perimeter metal railing around the site. This has been removed from the design to reduce the sense of built form. It has been replaced with a glass balustrade, set back from the parapet by 3m to facilitate the sedum roof. The balustrade will only be visible from the street scene at a distance.
  - The landscape design now incorporates a greater ratio of permeable paving, soft landscaping as well as the new Sedum Roof. Furthermore, built in planters have been introduced to the metal cladding at first floor level as an extension of the landscape design.
  - Within this application there are no windows that directly look into any adjoining amenity areas, this is to mitigate any amenity relates issues.
- 5.1.22. The amendments to this submission have been done in line with comments received during the consultation of the previous application (LPA ref. 22/3017/FUL) and pre-application meetings with the EA and HE.
- 5.1.23. Overall, the footprint and built form have been reduced and there has been alterations to the design of key elements such as the boundary wall in line with relevant consultees comments and the planning context of the site. We believe this application should now be approved.

## 6 RELEVANT PLANNING POLICY AND GUIDANCE

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- 6.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.1.2. The proposals are designed to accord with all relevant national, regional and local planning policy and guidance. Broadly speaking, policy and guidance at the national and regional levels highlight a pressing need for more housing and promotes the efficient use of urban land at sustainable locations to meet this need.
- 6.1.3. The LBRuT's Development Plan comprises:
- London Plan (2021); and
  - LBRuT Local Plan 2018.
- 6.1.4. The LBRuT is currently preparing a new Local Plan. The draft Local Plan is currently at Pre-Publication Regulation 18 Consultation stage, public consultation for this version of the emerging plan ended on 31 January 2022. The emerging Local Plan is anticipated to be adopted in Autumn 2024. This document is at its very early stages and therefore, should be given very limited weight.

### 6.2 NATIONAL PLANNING POLICY FRAMEWORK (2021)

- 6.2.1. The revised National Planning Policy Framework (NPPF) (July 2021) sets out the government's planning policies for England and how these are expected to be applied. The Planning Policy Guidance (PPG) provides guidance on how the NPPF should be applied.
- 6.2.2. Both the NPPF and NPPG are important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the development plan without delay.
- 6.2.3. With reference to the proposed development, relevant chapters from the NPPF (2021) include:
- Chapter 2: Achieving sustainable development;
  - Chapter 5: delivering a sufficient supply of homes;
  - Chapter 8: Promoting healthy and safe communities;
  - Chapter 9: Promoting sustainable transport;
  - Chapter 11: Making effective use of land;
  - Chapter 12: Achieving well-designed places;
  - Chapter 13: Protecting Green Belt land; and
  - Chapter 14: Meeting the challenges of climate change, flooding and coastal change.

## 6.3 LONDON PLAN (2021)

6.3.1. The following policies within the London Plan are relevant to the proposed development:

- Policy GG4 Delivering the homes Londoners need
- Policy D1 - London's form, character, and capacity for growth
- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 - Delivering good design
- Policy D6 - Housing quality and standards
- Policy D5 – Inclusive design
- Policy D8 - Public realm
- Policy D11 – Safety, security and resilience to emergency
- Policy HC1 - Heritage conservation and growth
- Policy H1 - Increasing housing supply
- Policy H2 - Small sites
- Policy H4 – Delivering affordable housing
- Policy H10 - Housing size mix
- Policy G3 - Metropolitan Open Land
- Policy G5 – Urban Greening
- Policy G6 - Biodiversity and access to nature
- Policy SI 2 – Minimising Carbon Dioxide Emissions
- Policy SI12 - Floor risk management
- Policy SI13 - Sustainable drainage
- Policy T4 – Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Parking

## 6.4 LBRUT LOCAL PLAN (JULY 2018)

6.4.1. The relevant policies from the LBRuT Local Plan are identified below:

- Policy LP 1 – Local Character and Design Quality
- Policy LP 2 – Building Heights
- Policy LP 3 – Designated Heritage Asset
- Policy LP 5 – Views and Vistas
- Policy LP 8 – Amenity and Living Conditions
- Policy LP 10 – Local Environmental Impacts, Pollution and Land Contamination
- Policy LP 11 – Subterranean developments and basements
- Policy LP 13 – Green Belt, Metropolitan Open Land and Local Green Space
- Policy LP 15 – Biodiversity
- Policy LP 16 – Trees, Woodlands and Landscape
- Policy LP 17 – Green roofs and walls

- Policy LP 20 – Climate Change Adaption
- Policy LP 21 – Flood Risk and Sustainable Drainage
- Policy LP 22 – Sustainable Design and Construction
- Policy LP 24 – Waste Management
- Policy LP 34 – New Housing
- Policy LP 35 – Housing Mix and Standards
- Policy LP 36 – Affordable Housing
- Policy LP 37 – Housings Needs of Different Groups
- Policy LP 38 – Loss of Housing
- Policy LP 45 – Parking Standards and Servicing

## **6.5 NON-STATUTORY PLANNING DOCUMENTS**

6.5.1. The following documents do not form part of the Development Plan but are relevant to the appeal, as material considerations. Though some of the documents listed below were adopted before the Local Plan, they remain in general accordance with the NPPF:

- Design Quality (2006);
- Small and Medium Housing Sites (2006);
- Front Garden and Other Off-Street Parking Standards (2010);
- Refuse and Recycling Storage requirements (2015);
- Sustainable Construction Checklist (2016);
- Affordable Housing (2014);
- Residential Development Standards (2010) incorporating the Nationally Described Space Standards; and
- Strategic Flood Risk Assessment (2020).

## 7 KEY PLANNING CONSIDERATIONS

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7.1.1. The key planning considerations section relates to the proposed development.

### 7.2 PRINCIPLE OF RESIDENTIAL USE

7.2.1. The need for housing across London is critical. Local, regional and national planning policy promotes the effective use of previously developed land to help deliver much needed new homes.

7.2.2. Policy H1 of the London Plan identifies the pressing need for more homes in London and sets an annual target for housing supply of at least 411 new homes per year for LBRuT between 2019/20 – 2028/29. Policy LP 34 of the LBRuT Local Plan refers to the 2016 London Plan targets which states that LBRuT should deliver 315 new homes per year with between 100-150 homes within the Twickenham area over the Local Plan period. Therefore, this is a significant jump for the new targets and clearly identifies the need for new homes within the Borough.

7.2.3. The need for more housing across London is well document by both government and the Mayor for London. Local, regional and national planning policy promotes the effective use of previously developed land to help deliver much needed new homes.

7.2.4. The London Plan is predicated on two key policy approaches. The first being for more new housing to be accommodated in outer London Boroughs, such as Richmond, than has historically been the case – and the second being that a greater proportion of London’s housing need should be met on smaller, unallocated sites. It is sites like the application site, which the London Plan envisages will meet the housing needs of people in living in London over the lifetime of the plan. It is therefore important that the Council plays its part to bring forward as many small sites as possible and for each site to make its full contribution to providing the maximum reasonable level of housing provision. In the context of both the London Plan and LBRuT’s Local Plan, the delivery of much needed new housing within the site fully accords with London wide and local planning policies.

7.2.5. The proposal is to demolish the existing building which provides three residential flat and re-provide three residential family dwellings. The proposal seeks to retain the same number of residential dwellings but as family residential dwellings. Given there is no loss of residential dwellings, the proposal complies with Policy H1 and Policy LP 35 of the Local Plan.

### 7.3 PRINCIPLE OF DEMOLITION

7.3.1. Repairs to the existing site would be financially and practically unviable given the significant number of improvements that would be required to bring the building up to regulation standards. Therefore, the most viable and practical option would be demolition of the existing building.

7.3.2. Policy H8 of the London Plan seeks to replace any loss of housing with new housing with at least the equivalent level of overall floorspace. Policy LP 38 of the Local Plan states that existing housing should be retained, however, redevelopment of existing housing should only take place where:

*“a. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and, if this is the case*

*b. the proposal does not have an adverse impact on local character; and*

*c. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35 Housing Mix and Standards.”*

- 7.3.3. The proposal can demonstrate that it meets all three policy LP 38 requirements.
- 7.3.4. In relation to Policy LP 38, Part C (a), the submitted Condition Survey Report provides an insight into the current state of the existing site. The site has several elements that are considered to be in poor or extremely poor state. The work required to get the site to a satisfactory would require demolition to some extent even if the overall building was retained. Therefore, as a result of the poor state of disrepair, the demolition of the site is unavoidable in order for any future proposal to be practically and financially viable.
- 7.3.5. With consideration to Part C (b), the existing site at pre-application stage was considered to not be of any particular quality to the surrounding area in terms of character. This was the opinion of LBRuT urban design officer who stated in the pre-application report that they did not object to the demolition and replacement of the existing 1960s building for this particular reason. Furthermore, the submitted heritage report also highlights that the existing building negatively impacts on the riverbank setting. Therefore, the site is of little importance to the surrounding area in terms of local character.
- 7.3.6. The proposal will retain three residential dwellings but will re-provide three family sized dwellings. This is an improvement to the current housing supply on the application site. The existing three residential units in situ are in poor state of disrepair and require a significant number of construction/amendments to bring the dwellings up to current/modern building regulation standards. The proposal is, therefore, to demolish the existing building and provide three new family sized dwellings.
- 7.3.7. Part B of Policy LP 3 (Designated Heritage Asset) states that substantial demolition in conservation areas should be resisted, however, demolition in the conservation area should only take place where:
- “1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;*
  - 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or*
  - 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.”*
- 7.3.8. The proposal can demonstrate that it meets the three policy requirements of the Council.
- 7.3.9. Part B (1 and 2) requires proposals to provide substantial public benefits to outweigh the substantial and less than substantial harm/loss to heritage assets. The proposed development would include significant public realm development with the widening of the public walkway and the providing of a public seating space with views of important heritage assets and key views in the surrounding area. Therefore, it can be demonstrated that the proposal would provide substantial public benefits in line with the policy requirements to offset any harm/loss to the heritage assets within the conservation area as a result of demolition.
- 7.3.10. Part B (3) states that it must also be demonstrated that the current building does not make positive contribution to the character or distinctiveness of the area. Paragraph 4.2.5. highlights the position of the Council, stating the site is of no particular quality, in relation to contribution character and this would be applicable to Policy LP 3, Part B (3). Furthermore, the submitted Heritage Report highlights that the existing building has a negative impact on the setting of the riverbank and



therefore, its demolition and the rebuild of high-quality designed buildings enhances the conservation area.

- 7.3.11. Demolition of the existing building to allow for the redevelopment of the site to re-provide three residential dwellings complies with Policy LP3 and LP38 of the Local Plan and Policy H8 of the London Plan.

## 7.4 DEVELOPMENT IN METROPOLITAN OPEN LAND

- 7.4.1. The site is located within Metropolitan Open Land (MOL). Policy G3 (MOL) of the London Plan, Part A states that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. The Glossary of the LBRuT Local Plan states that a MOL is “*strategic open land within the urban area that contributes to the structure of London*” ... and...“*is predominately open land or water which is of significance to London*”. Policy LP 13 of the LBRuT Local Plan states that inappropriate development will be refused unless very special circumstances can be demonstrated that clearly outweigh the harm to the MOL.

- 7.4.2. Paragraph 149 of the NPPF sets out the exceptional circumstances whereby development affecting the Green Belt (which is adopted for MOL in both the London Plan and Local Plan) are acceptable. The relevant parts for this proposal have been set out below.

*“(c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building”*

- 7.4.3. The proposal would represent a significant change in the overall footprint of the site, however the changes to the footprint would not lead to an increase in floorspace.
- 7.4.4. The proposal would present a development that is greater in width to the existing site however, one that utilises the space on the site without overdevelopment. Despite this change in footprint, the proposed development would decrease in floorspace by 75.8sqm in comparison to the existing site. Therefore, the proposal would not lead to disproportionated additions over and above the size of the original building.

*d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.*

- 7.4.5. The proposal is to replace the existing residential use (C3) of three residential flats to provide three, family sized residential dwellings (C3). The proposal, therefore, remains in the same use.

- 7.4.6. The building, as existing, has a total footprint of 593.8sqm and the proposed development would have a footprint of 518sqm resulting in a reduction of the footprint by 75.8sqm. Therefore, the proposal is in fact smaller than what is has been there previously.

- 7.4.7. The proposal accords with Paragraph 149, Part (d) of the NPPF.

*g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

*– not have a greater impact on the openness of the Green Belt than the existing development; or*

*– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

- 7.4.8. With consideration to part g, the proposal would not increase in floorspace, and the footprint would remain modest. Furthermore, the proposed 1.1m increase in roof height would be offset by the design-led approach and would present an improvement on local views through the delivery of a high-quality and well-designed proposal. In short, the proposal protects the openness of the MOL whilst providing three high quality family sized residential dwellings.
- 7.4.9. The proposal would satisfy the exceptional circumstances test (Paragraph 149, Part (c), (d) and (g) of the NPPF) and as a result the proposal would not compromise the MOL. Therefore, the proposal would satisfy the policy requirements of the LBRuT Local Plan, London Plan and the NPPF with consideration to development in the MOL.

### **VERY SPECIAL CIRCUMSTANCES**

- 7.4.10. During the assessment of the previously withdrawn application (LPA ref. 22/3017/FUL) LBRuT states that the proposed development required the application to set out a Very Special Circumstances (VSC) case due to the Metropolitan Open Land (MOL) designation.
- 7.4.11. Paragraph 149 of the National Planning Policy Framework (NPPF) sets out that the construction of new buildings in the Green Belt/MOL can be considered as an exception to the general rule that it is inappropriate and therefore, harmful where it involves the following:
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; or*
  - g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
    - not have a greater impact on the openness of the Green Belt than the existing development; or*
    - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting identified affordable housing need within the area of the local planning authority.*
- 7.4.12. With consideration to paragraph 7.4.2 of this PS, the proposal would therefore not require a VSC case.
- 7.4.13. The proposed building would continue to be in the existing use as three, C3 residential dwellings and is being built on previously developed land.
- 7.4.14. The proposed building is not materially larger than the existing and will not have a greater impact on the openness of the MOL in comparison to the existing development. Drawings and Illustrations have been submitted within this application comparing the existing and proposed footprint and height/massing and impact.
- 7.4.15. The argument can be made that the proposed development improves the openness of the MOL due to the following:
- The removal of the existing decayed and overbearing canopy which overhangs the Thames Path and encloses the sense of openness for pedestrians at ground level;
  - The creation of new “open space” is also further improved at ground level with the widening of the pathway, more details of this provided below;

- The existing stairs fronting onto the pathway results in antisocial behaviour. The proposal removes the ability for antisocial behaviour by removing the stairs and installing a new wall between the proposed development and the path. The proposal removing the stairs and widening the pathway, therefore, increases the sense of safety along the path which is a significant public benefit and opens up the views along the pathway; and
- The façade is also moved back from its current positions as shown on the cross section which opens up the pathway further.

7.4.16. In addition, the footprint of the development is less than the existing. The footprint is reduced from 593.8sqm to 518sqm.

7.4.17. The scale of the new building in the MOL is similar to that of the existing and will improve the relationship as the Council has accepted that the current building detracts from the area.

7.4.18. With consideration to the above points, the proposal should not require a VSC.

7.4.19. If the Council maintains the view that the development does not satisfy the above tests, there are clear VSC, as follows:

- The enhancements to the conservation area and the setting of the listed lock buildings to the east of the site. The proposal has been designed with the upmost consideration to the conservation area and heritage assets, not only preserving the character and setting of the conservation area but also enhancing the conservation area.
- The proposal will deliver high quality, sustainable family homes in place of the existing which has been converted and adapted to three, C3 residential dwellings over time. This would allow for the delivery of additional landscaping on the site with greater soft landscaping and green space. Therefore, this proposal is an opportunity to deliver important and positive change on the site, including Biodiversity Net Gain (BNG).
- The proposal would also deliver significant public enhancements in the surrounding area. The widening of the public riverside walkway, improvements to the boundary treatment and delivery of a public seating area would be achieved by contributing some of the land from the side. This would allow for the delivery of safe, clean and useable public space for residents and visitors.
- Similarly, the flood performance of the site would improve through the widening of the public walkway and other flood resilience measures through increasing the base level of the proposed building.
- Provision of £100,000 towards affordable housing contribution.

7.4.20. As such, even if VSC are required, these clearly exist and would outweigh any potential harm to the MOL resulting from “inappropriateness” in policy terms or any other material considerations.

## **7.5 DEVELOPMENT IN THE RIVER CORRIDOR AND IMPROVEMENTS TO THE PUBLIC REALM**

7.5.1. Policy LP 18 of the Local Plan, Part C relates to river corridors and states that proposals alongside or adjacent to river corridors should retain the existing public access whilst also enhancing the existing public access to the riverside where improvements are feasible. Furthermore, Part D relates to the River Thames public riverside walk and states that all development proposals adjoining the River Thames are required to provide a public riverside walk.

7.5.2. Given the site is located within the Thames Policy Area and in line with Policy LP18, any proposal should account for the character of the area. Development along and adjacent to the River Thames

should establish a relationship with the river, maximise the benefits of the settings in terms of views and vistas, and incorporating uses that enable the public to enjoy the riverside.

- 7.5.3. Policy D8 (Public realm) of the London Plan also places emphasis on the improvement and maintenance of the public realm. Policy D8 seeks to encourage active modes of transport through well-designed public realm spaces. The policy also seeks to ensure that the public realm is safe, accessible, inclusive, attractive and well connected.
- 7.5.4. The proposal would provide significant improvements to the public realm with the widening of the existing river walk path from 1.77m to up to 2.76m and the creation of a new concaved corner facing the river and Richmond Lock Footbridge.
- 7.5.5. To achieve this the applicant will release an area of the sites land in order to provide the public realm improvements proposed within this application.
- 7.5.6. This approach to the public realm will provide residents and the surrounding area with a well-designed, safer and more accessible space as required by the policy requirements of the Local Plan and London Plan.
- 7.5.7. The widening of the public walkway will increase accessibility for residents and visitors, providing a more welcoming and safe space for users as well as encouraging active modes of transport such as cycling.
- 7.5.8. The proposed changes to the public realm would represent significant improvement in the surrounding area. Given the location of the site and public realm element within the conservation area and within the setting of significant heritage assets the proposed improvements would be an opportunity to provide a space of good design quality and practicality, helping to improve the areas character and quality. The proposed development would improve views to the footbridge, a significant heritage asset within the local area. Therefore, this element of the proposal would be in line with Policy LP 18 of the Local Plan and Policy D8 of the London Plan.

## **7.6 AFFORDABLE HOUSING**

- 7.6.1. Paragraph 64 of the NPPF states that provision of affordable housing should not be sought for residential developments that are no major developments. Policy H4 of the London Plan echoes this requirement, however, recognises that Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2. Policy LP 36 of the Local Plan has a target level of 50% of new housing units across the Borough to be affordable and this 50% will comprise of 40% affordable housing for rent and 10% for affordable intermediate housing. The Policy notes that on sites below the threshold of capable of ten or more units, a financial contribution to the Affordable Housing Fund commensurate with the scale of development.
- 7.6.2. This application is supported by the Financial Viability Assessment prepared by Grimshaw Consulting which has considered whether there is provision of a financial contribution towards affordable housing in the form of a payment in lieu of on-site provision is financially viable.
- 7.6.3. The assessment looks at the site specific constraints and costs as well as the revenue estimates and the need to provide a reasonable level of return for both the landowner and the developer.
- 7.6.4. The assessment uses the Council's commuted sum calculation spreadsheet as a base and includes likely S106 payments as well as CIL payments. The financial appraisal shows that there is a deficit and therefore, the proposal cannot support a payment in lieu of on-site affordable housing.

However, the applicant is willing to take less of a profit and offer £100,000 towards affordable housing.

- 7.6.5. In short, the proposal is not viable to make a financial contribution to affordable housing but is willing to reduce their profits to offer £100,000 towards affordable housing. Further details can be found within the Financial Viability Assessment prepared by Grimshaw Consulting.

## 7.7 DESIGN

- 7.7.1. The NPPF attaches great importance to the design of the built environment as a key part of sustainable development. This approach is reinforced in London Plan policies D3 and D6 and Local Plan Policy LP1.
- 7.7.2. As noted, the existing building is deteriorating and is of poor quality. The accompanying Heritage Statement identifies that the existing building makes a negative contribution to the significance of conservation area. Furthermore, the Council's own officers at pre-application stage did not object to the demolition of the existing building. The design of the scheme seeks to preserve and enhance the conservation area. The design team has taken on board comments received from officers during the pre-application discussions and residents during the consultation period. The design and its evolution are detailed below.

### Height, Scale and Massing

- 7.7.3. Local Plan Policy LP 1 states that the Council will require all developments to be of high architectural quality that respect their surrounding townscape and Policy LP 2 states that developments must reflect prevailing building heights within the vicinity. Policy LP 3 states that all proposals in conservation areas are required to preserve and, where possible, enhance the character or the appearance of the conservation area. Policy LP 5 (Views and Vistas) seeks to protect the quality of views which contribute significantly to the character, distinctiveness and quality of the local and wider area.
- 7.7.4. The site's location in Flood Zone 3a means that it is necessary to elevate the living areas of the new building and therefore, the new building will be elevated by 1.5m.
- 7.7.5. Despite this elevation of 1.5m the proposed height of the new building will be less than this and result in a slight increase in height of 1.1m. With consideration to Part 1 of Policy LP 2, the proposed change in building height would allow for important flood mitigation but would also encompass a new roof shape of a higher design quality and one that benefits the existing character of the surrounding area.
- 7.7.6. Despite the increase in height of the proposed building there would not be a detrimental impact on the views in the surrounding area. The site context and layout would offset any impact on the view of neighbours and through a design-led approach the development would both preserve and enhance the views and setting of heritage assets in the surrounding area and of those neighbouring properties.
- 7.7.7. In terms of the massing, Policy D3 of the London Plan states that developments must make the best use of land through design-led approach, optimising site capacity and ensuring the development is the most appropriate form and land use for the site.
- 7.7.8. The proposed building would have a footprint of 518sqm, the existing building has a footprint of 593.8sqm. Despite this reduction in footprint, the site would retain the existing three C3 units whilst

delivering a site of high design quality, surpassing space standards of the Local Plan and London Plan and the improvements to the public realm.

- 7.7.9. The reduction of footprint but retention of three dwellings demonstrates consideration to the surrounding area and the site with a proposal that is sensitive in terms of scale, massing and density, thus satisfying part 1 and part 3 of Policy LP 1 of the Local Plan and Policy D3 of the London Plan.
- 7.7.10. The width of the first floor and second floor has been reduced by 5.35m, the width of the ground floor has been reduced by 2.4m. The depth of the building has been reduced by 1m from the North to South elevations. Therefore, careful consideration has gone into the new design approach in terms of scale and massing to ensure the site has been optimised whilst also remaining sympathetic to the surrounding area context.
- 7.7.11. Furthermore, the site is 0.12ha and therefore, is considered a small site within Policy H2 (Small Sites) of the London Plan. Policy H2, Part A of the London Plan sets out that boroughs should proactively support well-designed new homes on small sites. The London Plan recognises the important of small sites in delivering new homes of different type and mix.
- 7.7.12. The design-led approach has allowed the client's small site to deliver much needed family sized housing dwellings without being disproportionate or excessive in its scale and density and without the loss of housing dwellings on the site.
- 7.7.13. Therefore, the proposed site plan/layout would satisfy Policy LP 1 of the Local Plan, Policy D3 and H2 of the London Plan through the design-led approach which has allowed for the maximum utilisation of the site space whilst providing a design sympathetic in its scale, proportions, and density.
- 7.7.14. The pre-application report issued by LBRuT related to a flatted development, the pre-application proposal was for nine units. The Council raised concerns regarding the flatted development stating that the proposal would be considered overdevelopment within the MOL by way of its over-scaled and too large site plan and design.
- 7.7.15. Overall, the slight increase in height but the further reduction in scale and massing of the proposal integrates successfully with the existing surroundings and is therefore in keeping with the conservation area. In fact, as identified within the accompanying Heritage Report, the setting will be improved by the proposed height and massing and therefore, the proposal will enhance the conservation area and preserve its significance character and setting. The proposed development therefore accords with national, regional and local policies.

### **Materiality and appearance**

- 7.7.16. Policy D6 of the London Plan and Policy LP 1 of the Local Plan requires developments to be of high-quality and respond to the surrounding area.
- 7.7.17. The proposed building is of a modern appearance but achieves a contextual response through the proposed use of traditional materials, including brickwork and detailing. Brick is prevalent in regard to the surrounding residential dwellings and design cues have been taken from the buildings along Martineau Drive.
- 7.7.18. Contemporary design details have been adopted through the use of high-quality brick detailing, stone, and bronze metalwork.

- 7.7.19. At the south elevation, treated timber louvres and panels are present at ground floor level, first floor and second floor level to unify the composition.
- 7.7.20. Bronze powder coated aluminium window frames with aluminium chamfered projecting extrusions and a flat stone framework with projecting frames have been proposed to the windows at the north elevation of the proposed buildings.
- 7.7.21. The proposal would include stone chamfered framed windows and cornice in places to reference the Lock Lodge with burnt end bricks on either side.
- 7.7.22. The design of first and second floors have been enhance to include a higher grade materials with consideration given to reflecting a boathouse architecture.
- 7.7.23. The proposal will seek to improve the overall setting of the River Walk. The proposal would include a boundary fence that would front the public walkway and would be in part of the street view from the foot path. In line with the comments received from HE, the proposed boundary wall has been reduced in height to 1.7m.
- 7.7.24. The proposed boundary wall is also a response to the issues caused by the existing relationship between the site and the public walkway. The proposed wall would represent a significant improvement on the existing layout where there is evidence of anti-social behaviour and vandalism.
- 7.7.25. Further details of the design and its evolvment have been provided within the Design and Access Statement as well as the Heritage Assessment.
- 7.7.26. Overall, the proposed development will significantly improve the appearance of the site when viewed from Ranelagh Drive and the public walkway. Through a modern design but with the use of traditional materials, the proposal will provide a new and positive contribution to the local character and distinctiveness of the conservation area as well as enhancing the setting of the footbridge. The proposal, therefore, accords with national, regional and local policies.

#### **Mix and quality of proposed living accommodation**

- 7.7.27. Policy D6 of the London Plan states that housing development should be of high-quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose. Part F of Policy D6 sets out the policy requirements for private internal space. Dwellings are required to satisfy the gross internal floor area set out within the London Plan, this is also in line with national policy.
- 7.7.28. Policy LP 35 of the Local Plan requires all development to provide family sized housing. Paragraph 9.2.2 of the Local Plan goes on to state that the mix of market housing should be considered on a site-by-site basis having regard to its location, the existing stock and the character of the area. Part A states that development should generally provide family sized accommodation and that the housing mix should be appropriate to the site-specifics of the location.
- 7.7.29. This proposal was designed in response to the pre-application comments provided by LBRuT and the EA who specifically stated they would not support any more than three houses on this site due to flooding issues. The proposal has therefore, reduced since pre-application stage where nine flats were being proposed to three residential family dwellings. Given the EA would only support three residential dwellings, the scale and layout of the dwellings have been designed to fit within the existing building footprint whilst providing high quality living accommodation.

- 7.7.30. Dwelling 1 will have a total GIA of 313.52sqm, dwelling 2 will have a total GIA of 273.2sqm and dwelling 3 will have a GIA of 306.69sqm. Although the GIA exceed the minimum space standards, officers should recognise that given the sites flooding matters, the EA would object to any more dwellings on site and therefore, should welcome larger houses which provide high quality living standards in this location.
- 7.7.31. The proposal, therefore, be in accordance with national, regional and local policies

### **Private Amenity Space**

- 7.7.32. Policy D6 of the London Plan sets out the private outside space policy requirements for developments. Policy LP 35, Part C states that all new housing development should provide adequate external space. Purpose built, well designed and positioned balconies or terrace are encouraged where new residential dwellings are on upper floors. Part E emphasises that accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space. Therefore, the proposed amenity space has been designed and shaped with the needs of future occupants at the forefront.
- 7.7.33. Developments are expected to provide a minimum of 5sqm of private outdoor space for one-two person dwellings and provide an addition 1sqm or each additional occupant.
- 7.7.34. Each dwelling would benefit from a first-floor balcony/patio to provide the necessary standard of amenity space as well as a garden space in footprint of the application site.
- 7.7.35. Given the proposal is for three residential dwellings for eight persons, each dwelling is required to provide at least 11sqm of private outside space.
- 7.7.36. Through utilisation of the site and the provision of high quality landscaping, dwelling 1 is provided with 156.22sqm of private outside space, dwelling 2 benefits from 53.14sqm, dwelling 3 has 254.78sqm of private outside space and proposed 257.29sqm of ground floor shared amenity space. Although the amount of amenity exceeds the minimum space standards, the proposal includes a large amount of landscaping which adds to the surrounding area, particularly in regard to ensuring the public walkway retains its important greenspace. Furthermore, the proposed new residential dwellings are for families and therefore, amenity space that exceeds minimum space standards should be welcomed by the Council.
- 7.7.37. The proposal, therefore, satisfies national, regional and local policies.

### **Basement Development**

- 7.7.38. The proposed lower floor level/basement development is an element of the proposal that was also included at pre-application stage. The pre-application report states that this proposal will need to satisfy Policy 11, Part B.
- 7.7.39. As part of the application, a Basement Impact Assessment (BIA) has been undertaken to outline the measures taken to reduce floor risk and the implementation of a suitable surface water drainage strategy.
- 7.7.40. Policy 11, Part B of the Local Plan sets out the following policy requirements for basement development:
- Proposals should not extend beneath a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area.



- Demonstrate the scheme safeguards the structural ability of the existing building, neighbouring buildings and other infrastructure, including those related to the highways and transport.
- Use natural ventilation and lighting where habitable accommodation is provided.
- Included a minimum 1m naturally draining permeable soil above any part of the basement beneath the garden area, and provide a satisfactory landscaping scheme;
- Demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with Policy LP 21.

7.7.41. The proposed lower ground floor element of the proposal would be located within the footprint of the proposed building and would not extend out beyond this footprint. Therefore, the site would not extend beyond 50% of the existing garden land or more than half of any other undeveloped garden area.

7.7.42. The proposed lower ground floor element would be used as an office and storage space and therefore would not be a habitable room and therefore natural ventilation and lighting would not be required.

7.7.43. The building has been raised by 1.5m in order to adapt to the site's flood risk. Therefore, this has been proposed in order to ensure that the scheme will not increase or exacerbate the flood risk on site and in the surrounding area.

7.7.44. Therefore, it is evident that the proposed lower floor element/basement development would satisfy the policy requirements of Policy 11 of the Local Plan.

## **7.8 HERITAGE**

7.8.1. Policy LP 3 (Designated Heritage Asset) sets out the policy requirements and key considerations for proposals impacting heritage assets and those located within the conservation area. The site is located within the St Margaret's Estate Conservation Area.

7.8.2. Part A of Policy LP 3 states that development will be required to conserve and, where possible, take opportunities to make a positive contribution to the historic environment of the Borough.

7.8.3. Part B outlines that the Council will resist substantial demolition in conservation areas and any changes that could harm heritage assets unless it can be demonstrated that proposals can achieve public benefits that outweigh any potential harm or loss to heritage assets.

7.8.4. Part C of LP3 requires proposals to preserve, and where possible enhance the character or appearance of the conservation area.

7.8.5. The demolition of the existing building will remove a building of poor-quality that harms the conservation area. LBRuT have supported the demolition of the existing building given it is not of any architectural interest.

7.8.6. Furthermore, the public realm improvements proposed for the public walkway and surrounding area would demonstrate and provide important public benefits that would outweigh the loss of the existing building.

7.8.7. Therefore, with consideration to Part B of LP 3, the demolition of the existing building has in principle been supported by LBRuT. The proposal will seek to make important public realm improvements and therefore the demolition of the existing site would be acceptable.

- 7.8.8. The existing building is not a positive contributor to the local character and the character of the conservation area. The replacement building presents an opportunity to provide a high quality, modern building.
- 7.8.9. The Heritage Statement, submitted alongside this application, supports this view and states that the proposal would remove a detractor building within the conservation area and introduce a highly attractive development that would reinforce the local character and distinctiveness in line with paragraph 197 of the NPPF.
- 7.8.10. The proposal would be an enhancement of the street scene and the heritage assets in the surrounding area and the conservation area.
- 7.8.11. Overall, the proposal would be of a high-quality, bringing forward a site with design and landscaping that contributes positively to the conservation area in terms of view and character. Alongside improvements to the public realm, the proposal is an opportunity to provide a sympathetically designed, sustainable site in line with the policies of the Local Plan and NPPF.

## **7.9 NEIGHBOURING RESIDENTIAL AMENITY**

- 7.9.1. Policy LP 8 of the Local Plan states that proposals should ensure they are not visually intrusive and should not have an overbearing impact as a result of their height, massing or siting, including through creating a sense of closure. It goes on to state that proposals must also ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and spaces.
- 7.9.2. The application site is unique in its position that it does not have neighbouring properties to either flank or therefore there would be no amenity impact to anyone from the side elevations of the proposed site. Therefore, there can be no impact with consideration to amenity from those elevations of the site.
- 7.9.3. Consideration needs to be given to the neighbouring property to the rear of the site at Martineau Drive. The proposal would increase on the height of the existing site by 1.1m. However, any potential amenity impacts on neighbouring properties are offset by the site levels and distance between the site and neighbouring property. This was further supported by the case officer during the refused application whom stated that their was an acceptable distance between the site and neighbouring properties at Martineau Drive. The site is considerably set down from the properties at Martineau Drive and furthermore is located on a sloping gradient. Furthermore, the application site is located 25m away from the property to the rear at Martineau Drive.
- 7.9.4. The configuration of windows to the rear elevation of the site have been altered so that no windows would directly look into any adjoining amenity areas.
- 7.9.5. This application is submitted alongside a daylight and sunlight report. This has been done with consideration to the impact of the proposal upon daylight and sunlight to neighbouring residential properties and the provision of daylight and sunlight within the scheme proposal.
- 7.9.6. The daylight and sunlight report concludes that the impact of the proposed upon daylight and sunlight to neighbouring residential properties meets BRE Guide default target.
- 7.9.7. For the site, all rooms satisfy, as applicable, target criteria for daylight and sunlight, and suitable sunlight provision is also available to amenity areas.
- 7.9.8. Therefore, the proposal would not impact the amenities of neighbouring properties and would satisfy the policy requirements of Policy LP 8.

## 7.10 LANDSCAPING

- 7.10.1. The proposal submission package includes proposed landscape plans for the proposal.
- 7.10.2. Policy LP 15 of the Local Plan relates largely to biodiversity, however part 6 of LP 15 states proposals should maximise the provision of soft landscaping, including trees, shrubs and other vegetation.
- 7.10.3. The proposal will be comprised of both soft and hard landscaping including the planting of weeping silver birch trees, grasses and other vegetation.
- 7.10.4. In terms of hard landscaping, the hard landscaped car parking areas and spaces around the site will be constructed of a pebble resin precast surface.
- 7.10.5. The landscaping plan will also include new weeping silver birch and protect the existing trees on site. This would be alongside the planting of grasses, lavender, ornamental grasses and other elements of green space.
- 7.10.6. This also includes a timber bin store and cycle enclosure.
- 7.10.7. Therefore, the landscaping for this proposal would include a mix of soft and hard landscaping elements as well as key accessibility features such as car and cycle parking spaces. The proposal would include a variety of soft landscaping measures and therefore would satisfy Policy LP 15.

### **Sedum Roof**

- 7.10.8. Policy LP 17 (Green Roofs and Walls) of the Local Plan encourages and supports the use of green/brown roofs and walls on small scale developments.
- 7.10.9. The proposal includes a 150.51sqm sedum roof element to the elevation fronting the public walkway and River Thames and the side elevation of the site at first floor level.
- 7.10.10. Therefore, the proposed sedum roof element would be a feature supported by the local planning policy and would improve the appearance of the site.

## 7.11 ENERGY AND SUSTAINABILITY

- 7.11.1. Policy LP 20 (Climate Change Adaption), Part B requires new development, in their layout, design, construction, materials and landscaping should minimise the effects of overheating as well as minimise energy consumption in accordance with the Local Plans cooling hierarchy.
- 7.11.2. In line with Policy LP 22 (Sustainable Design and Construction) a Sustainable Construction Checklist SPD must be submitted for the proposed development.
- 7.11.3. Policy LP 22, Part B requires developers to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. For new residential proposals below 10 units, buildings should achieve a 35% reduction.
- 7.11.4. Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London requires that new development should be net zero-carbon. Reducing of greenhouse gas emissions in operation and minimising both annual and peak energy demand in line with the Be lean, Be clean, Be green and Be seen energy hierarchy.
- 7.11.5. A minimum on-site reduction of at least 35% beyond building regulations is required for all developments as well as the energy efficiency measures alone will be reduced for residential uses

by 10 percent below regulated CO2 emissions of a development compliant with Part L 2021 of the Building Regulations.

- 7.11.6. An Energy Report has been submitted alongside this application and demonstrates the calculations for the site using the energy hierarchy. The site achieves a site wide carbon reduction of 68% when compared against the compliant baseline case.
- 7.11.7. Therefore, the proposal is able to achieve a significant and policy compliant carbon reduction and satisfies the policy requirements of Policy LP 22 and Policy SI 2.

## **7.12 TRANSPORT AND ACCESSIBILITY**

- 7.12.1. Policy LP 45 of the Local Plan requires developments to provide for car and cycle parking, in accordance with standards set out in the Local Plan.
- 7.12.2. The Local Plan requires standard residential development in PTALs 0-3, consisting of 3+ bedrooms to provide two car parking spaces. The Local Plan requirements for cycle parking would be in line with requirements of the London Plan.
- 7.12.3. Policy T5 of the London Plan requires two cycle parking spaces per residential unit; therefore, the development would need to provide six units across the entire development for the proposed three units.
- 7.12.4. Local Plan policy would require the site to deliver two car parking spaces per residential unit and therefore six parking spaces must be provided on the site, two for each unit.
- 7.12.5. The proposed development provides each residential unit with two cycle parking spaces and two car parking spaces each. Therefore, a total of six cycle parking spaces and six car parking spaces are proposed on site, in line with policy.
- 7.12.6. A Transport Statement has also been submitted as part of this application and sets out the transport requirements and impacts of the proposal on future residents and the surrounding area.
- 7.12.7. The Transport Statement outlines the impact of the proposal would result in a negligible net increase of traffic on the local highway network in the peak hour with a total of eight two-way journeys across the 14-hour day.
- 7.12.8. Furthermore, the Transport Statement reiterates the level of car parking and cycle parking provided and access to the site is compliant with local and regional planning policy.
- 7.12.9. The proposed development would meet the requirements of Policy LP 45 of the Local Plan and Policy T5 of the London Plan by providing six car parking spaces and six cycle parking spaces in line with the policy requirements. Therefore, the proposed level of cycling and car parking spaces should be considered acceptable.

## **7.13 ENVIRONMENTAL MATTERS**

### **FLOODING**

- 7.13.1. Policy LP 21 sets out the policy requirements relating to flood risk and flood defences. This policy is a key consideration given the site is located within the functional floodplain and Flood Zone 3a.
- 7.13.2. Part A of Policy LP 21 requires all developments to avoid, or minimise, contributing to all sources of flooding whilst considering impacts of climate change.

- 7.13.3. The policy states that redevelopment of existing developed sites will only be supported if there is no intensification of the land use, and a net flood risk reduction is proposed.
- 7.13.4. London Plan Policy SI 12 (Flood Risk Management), part C states that development should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 7.13.5. The submitted Flood Risk Assessment sets out the strategy of the proposal to address flooding and drainage related issues and considerations.
- 7.13.6. The entrance level of the ground floor for each property has been raised to 6.9m aOD, which is 600mm above the design flood level. All areas of the building below this level will be of formidable flood proof construction.
- 7.13.7. The proposal would see a decrease in footprint from the existing site and therefore ensuring there is no increase in flood compensation storage at the site.
- 7.13.8. With consideration to the ground levels, the flood hazard associated with access and egress from the site remains the same as for the current property on the site.
- 7.13.9. This has been done in line with comments received during pre-application discussions with the EA and LBRuT.
- 7.13.10. Therefore, the proposal would satisfy the policy requirements of the Local Plan and London Plan Policy SI 12.

## **DRAINAGE**

- 7.13.11. Policy LP 21, Part C will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Any forthcoming proposal will have to demonstrate that they achieve a reduction in surface water discharge to greenfield run-off rates where feasible. If greenfield run-off rates are not feasible, this will need to be demonstrated and proposals will need to achieve at least a 50% attenuation of the site's surface water runoff at peak times.
- 7.13.12. The Surface Water Drainage Strategy has been developed in line with national and local policy requirements.
- 7.13.13. All flows from the site will discharge into the tidal Thames via a short length of Thames Water Sewer beneath Ranelagh Drive.
- 7.13.14. Green roofs are provided on areas of flat roof for each residential dwelling which discharges into rainwater butts for non-potable uses. Excess flows will be re-routed into the permeable paving.
- 7.13.15. The strategy proposed follows all required SuDs principles and therefore satisfies the policy requirements of Policy LP 21 of the Local Plan.

## **BIODIVERSITY, ECOLOGY AND LIGHTING**

- 7.13.16. Policy LP 15 (Biodiversity) states that the Council will protect and enhance the Borough's biodiversity, protecting biodiversity in existing habitats and features of biodiversity value.
- 7.13.17. Policy LP 15 outlines the Council's support for enhancements to biodiversity as well as placing an expectation for sites that maximise the provision of soft landscaping in order to contribute to the borough-wide Biodiversity Action Plan.
- 7.13.18. An ecological survey of the site was undertaken to determine the existence and location of any ecologically valuable areas and evidence of any protected species on the site.

- 7.13.19. The ecological survey paid particular attention to badgers, bats, herpetofauna and otters.
- 7.13.20. Overall, the ecological survey found there are no habitats of international, national, county or local importance that would be directly affected by the proposal. The site is of overall low ecological value.
- 7.13.21. Furthermore, as detailed in the trees section of this report (para 7.13.26), the proposal would not impact any of the existing trees on site. Furthermore, the proposal would include greens roofs and further soft landscaping features in the amenity space.
- 7.13.22. Therefore, the proposal would comply with Policy LP 15 of the Local Plan and Policy G6 of the London Plan.

## **TREES**

- 7.13.23. Policy LP 16 (Trees, Woodlands and Landscape) sets out the policy requirements of the Council's local plan for proposals. Part A of Policy LP 16 outlines that the Council will require the protection of existing trees and the provision of new trees that complement and enhances the existing, or create new, high quality green areas.
- 7.13.24. Policy 16 states that to ensure developments protect, respect, contribute to and enhances trees and landscapes, the Council, will resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value. The policy requires that the site design/layout of a proposal ensures a harmonious relationship between trees and their surroundings. Importantly, the Council will resist development which is likely to result in pressure to significantly prune or remove trees.
- 7.13.25. Furthermore, Policy G7 (Part C) of the London Plan outlines the requirements for development proposals to ensure that, where possible, existing trees of value are retained on site. The policy also encourages the planting of additional trees in new developments.
- 7.13.26. Given the sites location within the conservation area, all trees on the site are protected. At pre-application stage that Council stated that where trees maybe impacted replacement planting will need to be on a minimum of a 1:1 ratio with no net loss of trees for the conservation area.
- 7.13.27. An arboriculture report has been prepared and submitted alongside this planning application.
- 7.13.28. The report outlines that a one tree (T1) will be removed from its existing location however a suitable replacement tree, of a similar size and location has been provided. Therefore, there will be no net loss of trees on the site.
- 7.13.29. The proposal would also include the provision of a new weeping silver birch trees on the site.
- 7.13.30. Protective fencing will be installed on site during construction to prevent unnecessary access into protected areas and to stop construction activities impact the protected space.
- 7.13.31. Therefore, the proposed works would protect the existing trees on the site and would not lead to a net loss of the existing trees in the conservation area as well as planting new trees on the site. The removal of tree T1 will be offset by a replacement of similar size, location, and type. The proposal therefore meets the policy requirements of LP 16 and Policy G7 of the London Plan.

## 8 CONCLUSIONS

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- 8.1.1. This PS has been prepared in to support an application for full planning permission on behalf of The Boathouse Twickenham Ltd to support a planning application at The Boathouse, Twickenham.
- 8.1.2. Planning permission is sought for the following:  
*“Demolition of existing building and outbuildings to provide three residential dwellings including associated landscaping works, provision of parking and works to the public realm.”*
- 8.1.3. The scheme has benefitted from extensive pre-application engagement with the LBRuT and HE as well as input and comments regarding the withdrawn application, which have positively contributed towards the submitted design proposals.
- 8.1.4. The proposed three, family sized residential dwellings development fully accords with the adopted local, regional and national policies. The proposal will assist in delivering a development of high design quality and character appropriate in the context of the sites location within the conservation area. Overall, the principle of development is acceptable.
- 8.1.5. This PS has provided a detailed analysis of the design of the proposed development in the context of its impact on the surrounding environment and the site. With particular focus on the public realm element and the sites’ location within the conservation area, Flood Zone 3a and MOL.
- 8.1.6. The development has been tested against all relevant standards and will provide high-quality, family accommodation to future occupiers whilst retaining the amenities of existing residential properties in the surrounding area. The scheme incorporates high-quality architectural design that will be a positive contribution to the local character and distinctiveness of the conservation area.
- 8.1.7. The demolition of the existing site has been considered acceptable at pre-application stage and it has been determined the current site is not of any design or character value in the surrounding area and conservation area. Demolition of the existing site will allow for the delivery of a proposal of higher design quality and one that is in line with the existing local character.
- 8.1.8. Overall, the development would deliver the following benefits:
- Retention of three residential dwellings.
  - Providing three high quality family residential dwellings, exceeding all space standards and private amenity space standards.
  - Improved design from the previous withdrawn submission.
  - Utilisation of space on and around the site to deliver high quality amenity space and public facilities.
  - Improved short and long distance views within the Conservation Area and in the setting of listed heritage assets.
  - Improvement of the public realm, including widening of the public footpath to improve accessibility.
  - Landscaping elements including a sedum roof, contributing to improvements in biodiversity and design.
  - Contribution to the heritage of the site through design and an art instalment.

- The applicant is willing to take less of a profit of the scheme, as set out within the Financial Viability Assessment and offer £100,000 towards affordable housing.

- 8.1.9. This PS has assessed the proposal against all other key planning considerations, including flooding, heritage, and sustainability.
- 8.1.10. This PS and all supporting documents outline the benefits which arise directly from the proposed scheme, and it is evident that the proposal will provide improvements to the conservation area and local area. Overall, the scheme is compliant with national, regional and local planning policies and guidance. It should, therefore, be approved without delay in accordance with the NPPF.





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