

Application reference: 23/0529/FUL TEDDINGTON WARD

Date application received	Date made valid	Target report date	8 Week date
28.02.2023	28.02.2023	25.04.2023	25.04.2023

Site:

Rear Of, 35 Twickenham Road, Teddington, TW11 8AH

Proposal:

Erection of one detached villa comprising two semi-detached dwelling houses with associated parking and landscaping

Status: Pending Consideration (If status = HOLD please check that all is OK before you proceed any further with this application)

APPLICANT NAME

Mr J Foster Kenny
21 Melville Road
London
SW13 9RH

AGENT NAME

Mrs Fiona Jones
3 Elizabeth Gardens
Ascot
SL5 9BJ

DC Site Notice: printed on 14.03.2023 and posted on 24.03.2023 and due to expire on 14.04.2023

Consultations:

Internal/External:

Consultee

LBRuT Ecology
LBRuT Lead Local Flood Authority
LBRUT Transport
14D POL

Expiry Date

28.03.2023
28.03.2023
28.03.2023
28.03.2023

Neighbours:

24 Manor Road, Teddington, TW11 8AB -
10 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
8 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
6 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
4 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
2 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
41D Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
12 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
49D Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
47D Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
47B Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
45D Twickenham Road, Teddington, TW11 8AH, -
45A Twickenham Road, Teddington, TW11 8AH, -
43D Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
43B Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
11 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
9 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
7 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
5 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
3 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
1 Blakeney House, 51 Twickenham Road, Teddington, TW11 8AJ, - 14.03.2023
41A Twickenham Road, Teddington, TW11 8AH, -

49B Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
41C Twickenham Road, Teddington, TW11 8AH, -
41B Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
39A Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
49C Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
49A Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
47C Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
47A Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
45C Twickenham Road, Teddington, TW11 8AH, -
45B Twickenham Road, Teddington, TW11 8AH, -
43C Twickenham Road, Teddington, TW11 8AH, -
43A Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
33A Twickenham Road, Teddington, TW11 8AQ, - 14.03.2023
37 Twickenham Road, Teddington, TW11 8AH, -
Flat 9, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 8, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 7, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 6, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, -
Flat 5, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 4, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 3, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 2, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 1, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 12, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 11, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Flat 10, High Wigsell, 35 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
25 Manor Road, Teddington, TW11 8AA, -
28 Manor Road, Teddington, TW11 8AB, -
26 Manor Road, Teddington, TW11 8AB, -
23 Manor Road, Teddington, TW11 8AA, - 14.03.2023
21 Manor Road, Teddington, TW11 8AA, - 14.03.2023
23A Manor Road, Teddington, TW11 8AA, - 14.03.2023
30 Manor Road, Teddington, TW11 8AB, - 14.03.2023
27 Manor Road, Teddington, TW11 8AA, - 14.03.2023
First Floor Flat, 39 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
Ground Floor Flat, 39 Twickenham Road, Teddington, TW11 8AH, -
Top Flat, 39 Twickenham Road, Teddington, TW11 8AH, - 14.03.2023
62 Michelham Gardens, Twickenham, TW1 4SB -
30 Avenue Gardens, Teddington, TW11 0BH -

History: Development Management, Appeals, Building Control, Enforcements:

Development Management

Status: PCO

Application: 23/0529/FUL

Date:

Erection of one detached villa comprising two semi-detached dwelling houses with associated parking and landscaping

Recommendation:

The determination of this application falls within the scope of Officer delegated powers - YES

I therefore recommend the following:

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

This application is CIL liable YES* NO
 (*If yes, complete CIL tab in Uniform)

This application requires a Legal Agreement YES* NO
 (*If yes, complete Development Condition Monitoring in Uniform)

This application has representations online (which are not on the file) YES NO

This application has representations on file YES NO

Case Officer (Initials): EMC

Dated: 12.07.23

I agree the recommendation: CTA

Team Leader/Head of Development Management/Principal Planner

Dated:11/08/2023.....

This application has been subject to representations that are contrary to the officer recommendation. The Head of Development Management has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

Head of Development Management:

Dated:

REASONS:
CONDITIONS:
INFORMATIVES:
UDP POLICIES:
OTHER POLICIES:

The following table will populate as a quick check by running the template once items have been entered into Uniform

SUMMARY OF CONDITIONS AND INFORMATIVES

CONDITIONS

INFORMATIVES

Reference	23/0529/FUL
Address	Rear Of 35 Twickenham Road Teddington TW11 8AH
Proposal	Erection of one detached villa comprising two semi-detached dwelling houses with associated parking and landscaping
Determination Date	EOT 11.08.23

1. INTRODUCTION

This application is of a nature where the Council's Constitution delegates the authority to make the decision to Officers rather than it being determined by the Planning Committee.

Before preparing this summary report the planning officer considered any relevant previous planning applications in relation to the development and considered any comments made by those interested in the application such as consultees with specialist knowledge and nearby residents.

By indicating that the development proposal does not comply with relevant Local Plan Policies, the planning officer has considered the information submitted with the application, any previous relevant applications, any comments received in connection with the application and any other case specific considerations which are material to the decision.

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

The application site formally contained 6 garages which were granted via 61/0077. This planning permission did not link the garages to No. 35 Twickenham Road or any other property. There was a condition applied that the garages should only be used for the garaging of motor vehicles. According to the officer report in 16/2171/FUL the garages were leased individually (not specifically associated with any property) until they became boarded up. The site was vacant at the time of 16/2171/FUL. The site has been visited and has been found to remain boarded up and vacant. The site is hence considered a Sui Generic use.

The site received consent for a residential development in 2017 (No. 1 detached 4 bedroom house) which has since expired and has not been implemented.

This application is for the erection of one detached villa comprising two semi-detached dwelling houses with associated parking and landscaping.

The surrounding character of the area is residential. The site is in Teddington Village. It is in the Cambridge Road and Surrounds Village Character Area 2 Hampton Wick & Teddington Village Planning Guidance.

The site is in Flood Zone 1 but is in an Area Susceptible to Groundwater Flooding. The site is subject to an Article 4 Direction (Basements). The site is in a Critical Drainage Area. The site is located in a Main Centre Buffer Zone which does not have to apply the Sequential Test (for Flood Risk) as set out in Local Plan Policy LP21.

3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

Application Site - History

17/0788/FUL - Demolition of lock up garages to provide 1 no. detached 4-bedroom dwellinghouse with associated parking, cycle and refuse stores, new boundary fence and hard and soft landscaping – Planning permission granted on 17/11/2017 with S106 securing AHC - £36,085, Monitoring fee - £1,805. Legal Fee £685.

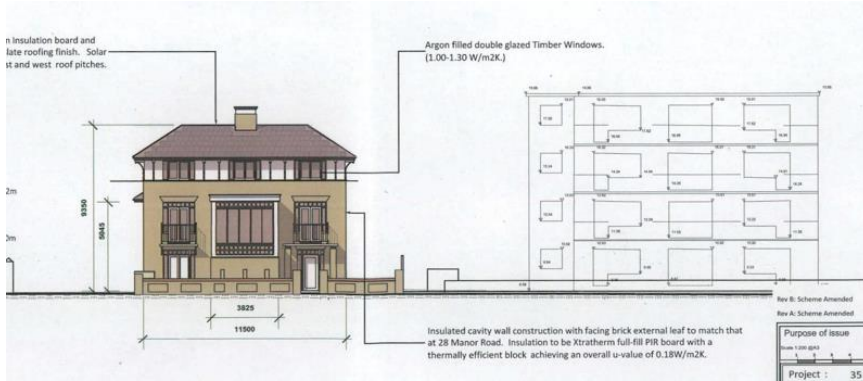


Figure 1. Proposed Front Elevation

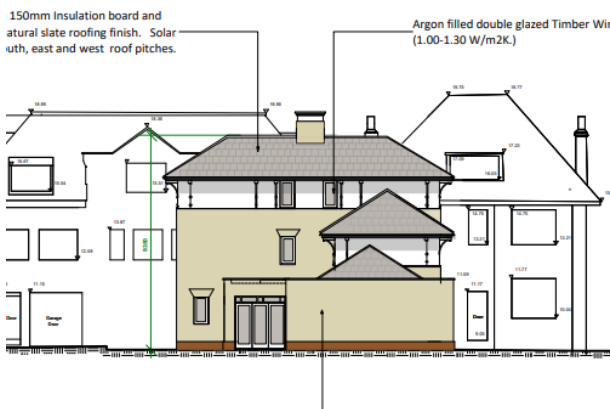


Figure 2. Proposed Rear Elevation

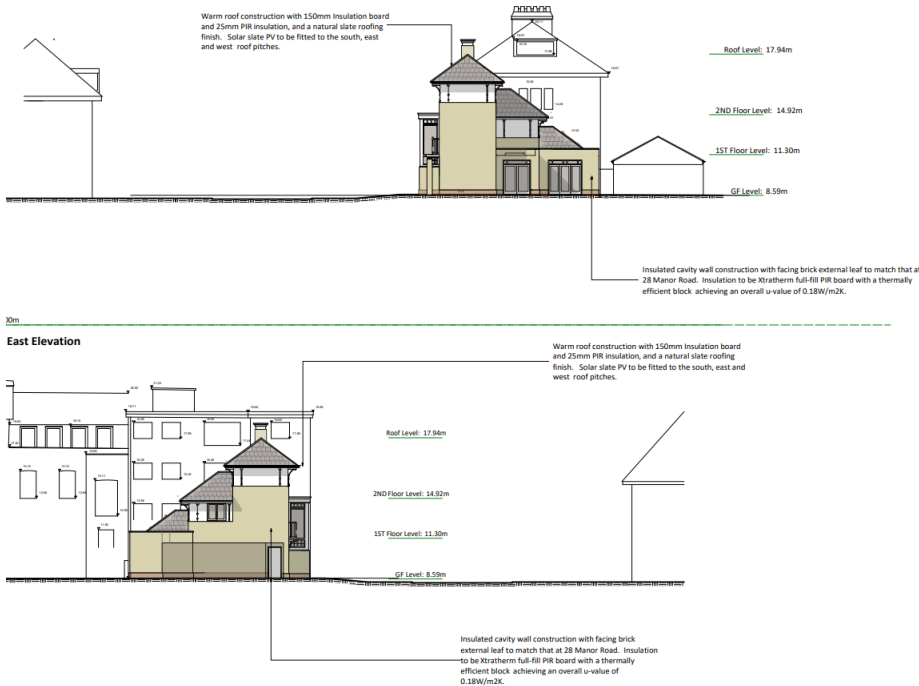


Figure 3. Proposed Side Elevations

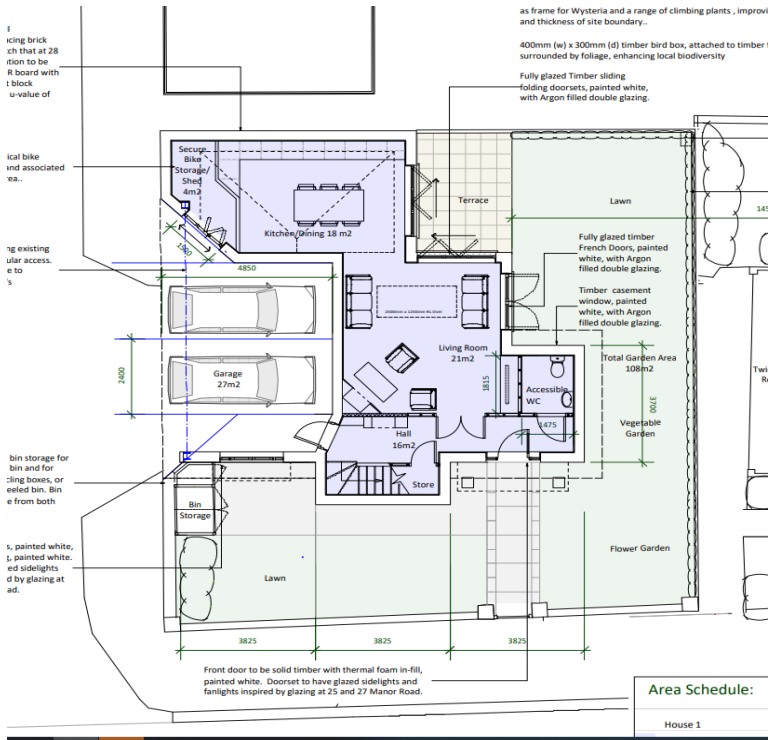


Figure 4. Site Plan

16/2171/FUL Demolition of 6 garages and construction of 2No. semi-detached dwelling units with associated garages and landscaping on land to the rear of 35 Twickenham Road. Refused Permission on 02/11/2016

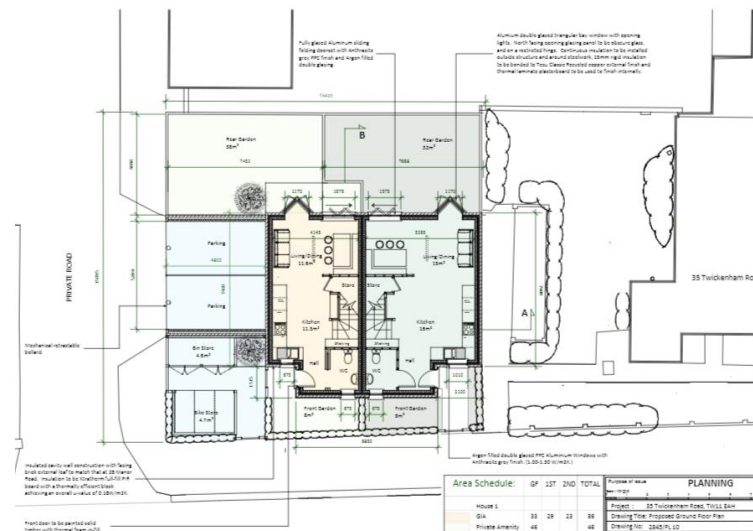


Figure 5. Site Plan

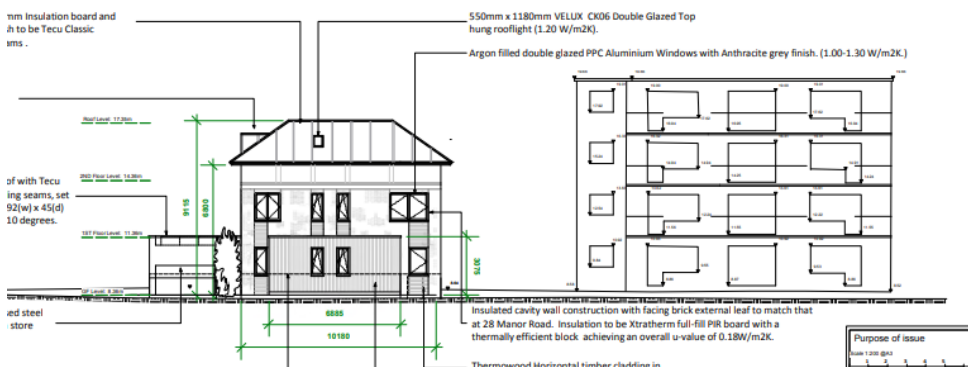


Figure 6. Proposed Front Elevation

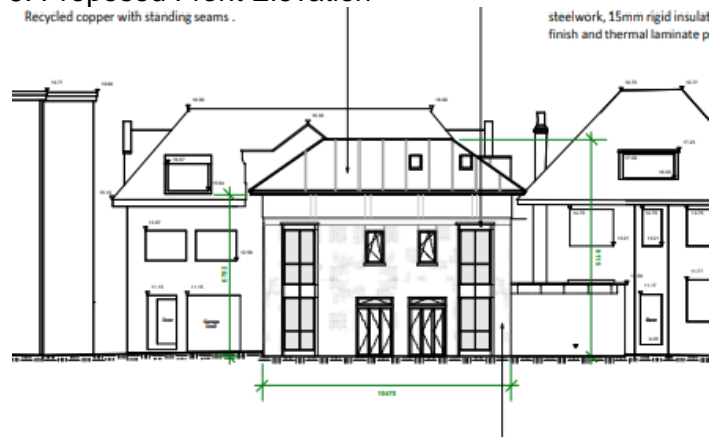


Figure 7. Proposed Rear Elevation

Reasons for refusal (5)

Affordable Housing

In the absence of a legal agreement to secure an appropriate contribution towards off-site affordable housing, the scheme fails to address the recognised housing need and will be contrary to, in particular, policy CP15 of the Core Strategy (2009), DM HO6 of the Development Management Plan (2011), Pre-Publication Local Plan Affordable Housing Policy LP 36, Supplementary Planning Document on Affordable Housing (2014) and the National Planning Policy Framework.

Neighbour amenity

The proposed pair of semi-detached properties by reason of its size, siting, and close proximity to the boundary of the site would have a visually overbearing impact on the neighbouring properties, No. 37 and 35 Twickenham Road and would result in an unreasonable loss of light to the ground floor flats at 35 Twickenham Road, and would therefore be detrimental to the amenities of the occupiers thereof. It would thereby be contrary to policy DM DC 5 of the Development Management Plan and Supplementary Planning Document: Small and Medium Housing Sites.

Design

The proposed dwellings by reason of their poor design, massing and siting in close proximity to the site boundaries with 35 and 37 Twickenham Road, would result in a congested and intrusive form of overdevelopment which would be incongruous and detrimental to the character and appearance of the streetscene and the setting of the surrounding Buildings of Townscape Merit. The proposal would thereby be contrary to policy, particularly CP7 of the London Borough of Richmond upon Thames adopted Core Strategy, policy DM HD3, DM DC1, DM HO2 and DM HO4 of the Richmond upon Thames Development Management Plan and Supplementary Planning Documents: Small and Medium Housing Sites and Design Quality.

External amenity

The proposed houses by reason of restricted plot size fail to meet the Council's minimum external amenity space standards and detrimental to the amenities of the future occupants thereof. As such, the proposal is contrary to policy DM HO 4 and DM DC1 of the Development Management Plan 2011 and Council's Supplementary Planning Document: Residential Development Standards 2010.

Sightlines

The proposal provides refuse and cycle storage facilities that obstruct sightlines at the vehicular access giving rise to an inconvenient and unsafe form of development prejudicial to pedestrian and highway safety.

The proposal is therefore contrary to policies DM TP 6 and 7 of the London Borough of

Richmond Upon Thames Development Management Plan 2011 and Supplementary Planning Documents: 'Small and Medium Housing Sites' and 'Front Garden and Other Off-Street Parking Standards'.

95/1075/FUL Erection Of 2 No 1 Bedroom Flats Above Car Parking Bays. Refused Permission on 28/09/1995.

Reason for Refusal:

The proposal, by reason of its size, excessive site coverage with buildings, hard surfaces and vehicles and close proximity to neighbouring residential properties would result in a cramped, vehicle dominated, and intrusive overdevelopment of the site, detrimental to the visual amenities of the locality in general, and the occupiers of adjacent residential properties in particular. As such, the proposal is contrary to Policies ENV 16, 20 and HSG 6 (Interim) of the Richmond upon Thames Local Plan and ENV 21, 26 and HSG 11 of the Council's Unitary Development Plan deposit draft.

61/1109 Erection of six garages. Refused Permission on 06/12/1961.

Reason for Refusal:

That the development as proposed will be injurious to the amenities of the area by reason of siting and if re-located to conform with the required building line to Manor Road, will leave insufficient manoeuvring room between the row of approved garages and the proposed development

61/0077 Erection of six garages. Granted Permission on 22/02/1961.

Adjacent Site - History

35 Twickenham Road - 19/1390/FUL- Construction of new 1bed (2 Persons) rooftop apartment with roof terrace, green roof and new external staircase thereto. Refurbishment of the existing block of flats installing new doors and windows, new glazed balustrading and supports to existing balconies, rendering of brickwork and addition of decorative pilasters and cornices. Refused Permission on 19/09/2019 Appeal Dismissed on 08/10/2020.

Heritage, Character & Design : The proposed new 1 bed (2 persons) rooftop apartment by reason of its excessive height, scale, bulk and mass would result in an unsympathetic and dominant form of overdevelopment which fails to appear subordinate and proportionate to the original block of flats to the detriment of the overall appearance of the original building, the adjoining terrace containing a row of Buildings of Townscape Merit in particular (Nos 37 - 49)(odd) and the setting of the Teddington Lock Conservation Area.

Furthermore, the development would appear an incongruous feature when viewed from the rear of the adjoining property No. 37 adversely impacting on the visual amenity of occupants thereof.

As such, the proposal fails to comply with, in particular, NPPF Paras 196 and 197, policies LP1, LP3, LP4 and LP8 of the Local Plan, the Hampton Wick and Teddington Village Planning Guidance SPD and the Teddington Lock Conservation Area Statement.

Affordable Housing : In the absence of a binding legal agreement to secure an appropriate contribution towards off-site affordable housing, the scheme fails to address this recognised housing need and will be contrary to, in particular, policy LP 36 of the Local Plan and Supplementary Planning Document on Affordable Housing (2014).

60/1248 Erection of a block of 12 flats. Granted Permission on 23/01/1961

60/1156 Erection of a building comprising 12 bed/sitting room flatlets. Granted Permission on 23/01/1961

60/0907 Erection of a building comprising 12 bed/sitting room flatlets and 2 one bedroom flats.
 Refused Permission on 08/12/1960. Reason for Refusal

The proposal would result in an excessive density of population beyond that provided for in the County Development Plan.

Preapplication advice via 22/P0172/PREAPP was also obtained.

4.CONSULTATIONS CARRIED OUT

Consultees	
LBRUT Transport	Objection to the proposed crossover is contrary to the Council Transport SPD 2020.
LBRUT Ecology	No objection subject to conditions addressing landscaping and biodiversity improvements.
LBRUT EH Contamination	No objection subject to conditions for site investigation works prior to commencement.
LLFA	No comment owing to the scale of the proposal. .

58 neighbours have been consulted. The adjacent neighbours include flats 1-12 at 35 High Wigsell, No.37 Twickenham Road, Flat 39A, ff Flat 39, Flat 39 and Top Flat 39 Twickenham Road, 28 Manor Road. Nos 21 – 23A Manor Road are opposite the site to the south who have been included in the consultation. The site notice expired on 14.04.23.

An objection form Councillor Phil Giesler was received calling for the application to be heard at Planning Committee were officers minded to approve the case. The Councillor objected to the application on the following grounds.

Councillor Objections	
Character and Design: significantly larger than, an application on the same site from 2016 (16/2171/FUL)	Please see the 'Character and Design' section below.
Neighbour Amenity: The new building would be in the close proximity of the house to site. Boundaries. Visually overbearing impact and unreasonable loss of light. The new application not only has a larger footprint but also is significantly taller than 16/2171/FUL	Please see the 'Neighbour Amenity' section below.
External Amenity Space: Minimum external amenity space	Please see the 'External Amenity Space' section below.
Sightlines: Parking arrangements outside the house do not give adequate sightlines for traffic or pedestrians passing close to the property.	Please see the 'Highways and Transport' section below.
Application has failed to address the reasons for refusal in 16/2171/FUL. Neighbour amenity issue not addressed. The external amenity, sightlines and design issues were not addressed. Failed to take account of the successful application 17/0788/FUL.	Please see the 'Reasons of Refusal' section below.

19 public objections have been received by 15 third parties.

Public Objection	
Overshadowing: The building overshadows and overlooks the High Wigsell communal gardens, especially the afternoon sunny lawn, which would be the only private area for the	Please see the 'Neighbour Amenity' section below.

tenants of the 12 flats and which would be lost during the afternoons	
Neighbour Amenity Impacts: Harmful to the enjoyment of our property through the resulting loss of privacy, daylight/sunlight, outlook, and creating an increase in the sense of enclosure. Over dominant and overbearing structure. Outlook would be significantly compromised for surrounding residential properties.	Please see the 'Neighbour Amenity' section below.
Overlooking/Privacy: Unacceptable overlooking impacts on 37-39 Twickenham Road, No. 28 Manor Road and surrounding gardens. The proposal is 13m away from High Wigsell directly looking into people's living spaces. And their communal garden.	Please see the 'Neighbour Amenity' section below.
Daylight/Sunlight: the daylight and sunlight assessment is inaccurate.	Please see the 'Neighbour Amenity' section below.
Encroachment: The single storey element of the scheme will generate significant encroachment into No. 37's rear garden area.	Please see the 'Neighbour Amenity' and 'Character and Design' section below.
Unacceptable Design: Excessive in height and massing. Out of keeping with the properties along Manor Road. The new proposal results in an unrelenting 'tenement style' 17m brick wall towering over the gardens and windows of the River Terrace properties and is not in keeping with the area. The proposal is of an unacceptable height, angular and unattractive appearance.	Please see the 'Neighbour Amenity' and 'Character and Design' section below.
Construction Disruption: Noise during the construction and disruption. Unacceptable obstruction of access to private road and garages.	Please see the 'Highways and Parking' section below.
Residential Development Standards: Out of keeping with the residential development standards	Please see the 'Residential Standards' section below.
Emergency Vehicles/Servicing: The side access serves emergency vehicles and waste servicing. It is also used for access for adjacent properties and should not be obstructed. All fire escapes from the Victorian properties in Twickenham Road are at the rear of the properties, backing onto this private road and it is the only access for Blakeney House and numbers 24 and 25 Manor Road.	Please see the 'Highways and Parking' section below.
Spacing: Ignores the established spacing between dwellings, building line and height prevailing on the street. Shoehorning two properties in to such a small site will lead to two unsustainable properties with the bare minimum amenity space living cheek by jowl beside an already large apartment block	Please see the 'Principle of Development' and 'Character and Design' section below.
Unacceptable Parking: Unacceptable level of car parking which would generate car parking stress upon existing local residents. 1 car parking space per unit is a under provision of car parking. Controlled parking Zones have been installed to deal with the car parking stress. Unacceptable sightlines for parking, loading and turning. We consider that pedestrian and vehicular sight lines will be inadequate at the junction of the private road with Manor Road. Avoiding car parking spaces immediately adjacent to the windows of habitable rooms, to prevent visual intrusion and fumes.	Please see the 'Highways and Parking' section below.
Overdevelopment of the Site: The site is suitable for 1 not two dwellings. Squeezing 2 houses into of this space is unacceptable. Excessive bulk, scale and mass.	Please see the 'Principle of Development' and 'Character and Design' section below.
Height: Excessive Height. Not integrate with the prevailing character of the street. Unsympathetic	Please see the 'Character and Design' section below.
Side Access/Land Ownership: The space claimed for the two cars belonging to the two dwellings	Please see the 'Highways and Parking' section below.

<p>shown on the latest proposal's ground level plan view drawing would be obstructing the private road that would previously not have been part of the landowner's territory, only having rights of passage with no rights to park upon. The applicant does not own the freehold. I and River Terrace Residents have a legal easement to use the lane abutting the property. The proposal includes a parking site on this lane. Will cause a dangerous obstruction for residents as well as refuse trucks, delivery vehicles and the emergency services. It should also be noted that the lane abuts many properties with young children who enjoy the outdoor amenity of the grassed areas of the lane and therefore the risk of pedestrian safety is vastly increased by the additional parking proposed.</p>	
<p>Heritage: The applicant has failed to demonstrate that the proposed development would not harm the setting of the row of Buildings of Townscape Merit ('BTM') adjacent to the application site and of the Teddington Lock Conservation Area ('TCLA'). This development does nothing to add to the character or integrity of the conservation area and detracts significantly from the historical integrity of the Victorian buildings of River Terrace. Lack of a Heritage Impact Assessment.</p>	<p>Please see the 'Heritage, Character and Design' section below.</p>
<p>Character and Design: Fails to enhance the character and appearance of the area as set out in the Hampton Wick and Teddington SPD.</p>	<p>Please see the 'Character and Design' section below.</p>
<p>Reasons for Refused Application 16/2171/FUL not addressed. The proposal is larger in size and scale to the refused application. Development not of an equivalent standard to granted scheme 17/0788/FUL. Proposal larger in bulk scale and mass compared to the refused scheme.</p>	<p>Please see the 'Reason for Refusal' section below.</p>
<p>Noise and Light Pollution: Increased noise and light pollution will impact my property and all the residents of River Terrace, contrary to Richmond's Residential SPD 2010.</p>	<p>Please see the 'Neighbour Amenity' section below.</p>
<p>Amenity Space: The new proposal has inadequate external space provided to sustainable outdoor amenity space for two family houses.</p>	<p>Please see the 'Amenity Space' section below.</p>
<p>Excessive Hard Standing: Open expanses of hard standing are generally unattractive and are unlikely to gain permission.</p>	<p>Please see the 'Character and Design' and 'Highways and Parking' section below.</p>
<p>Planning Statement: Inadequate. Does not consider impact of proposal on surrounding residential properties.</p>	<p>Please see the 'Principle of Development' section below.</p>
<p>Accuracy: The street view drawing, which appears to exaggerate the space between No. 28 Manor Road and the proposed dwelling.</p>	<p>Please see the 'Other Matters' section below.</p>
<p>Access/Construction: Although the two parking spaces are now both on their own land, this would not prevent the purchasers of these two dwellings and their guests from parking on the private road's corridor (currently grassy) adjacent to their properties. The architect's building planning documents and drawings also demonstrates that there would be parking of their construction vehicles on this land and in front of two garage driveways, blocking access for the landowners' cars to these garages during construction.</p>	<p>Please see the 'Highways and Parking' and 'Other Matters' section below.</p>
<p>Crossover: The new driveway now proposed is running off Manor Road, which would be resulting in even less on-street parking for the neighbourhood by taking the space from the on-street parking, in order to provide access across the pavement, only providing a single off-</p>	<p>Please see the 'Highways and Parking' section below.</p>

<p>street parking space in the place of the on-street parking space that they have taken. In effect, they have not provided any overall parking benefit for the neighbourhood and are in fact taking one (or more) of the on-street parking spaces for access to a single off-street parking space and consequently not providing for the replacement parking space that was indicated from the original drawing. The update does not appear to have considered the requirements, which resulted from the private road owners' rejection of the sale of this strip of land for parking purposes.</p>	
<p>Waste/Amenity Space: This update also seriously limits the available outside (garden) space for the major dwelling in order to provide a parking space alternative for the minor dwelling (and when also including a space for both dwellings' refuse bins). This raised platform parking and utilities space blocks much of the light to the adjacent basement windows.</p>	<p>Please see the 'Highways and Parking' and 'Amenity Space' section below.</p>

Residents Associations:

<p>The Blakeney House Residents Association: Objection</p>	
<p>I have been instructed by the Board of The Blakeney House Residents' Association Ltd to write to you with the following comment in respect of the planning application to build 2 houses adjacent to the entrance of the rear driveway to Blakeney House flats. The Residents' Association is the freeholder of the rear driveway. The planning application shows that a strip of land on the driveway is to be used to provide car parking space for one house. Our understanding is that this strip of land is presently part of the driveway that we own. The Board of Directors has resolved that the strip of land will not be disposed of for the purposes of car parking.</p>	<p>Please see the 'Highways and Parking' and the "Other Matters' section below.</p>

<p>The Teddington Society: Public Observation</p>	
<p>The proposed fenestration shown in this application is very stark, lacking in any detail that would relate this building to the fine adjacent houses in Manor Road - which are Buildings of Townscape Merit.</p>	<p>Please see the 'Character and Design' section below.</p>

5. MAIN POLICIES RELEVANT TO THE DECISION

NPPF (2021)

The key chapters applying to the site are:

- 2. Achieving sustainable development Paragraphs 7 to 14
- 3. Plan-making Paragraphs 15 to 37
- 4. Decision-making Paragraphs 38 to 59
- 5. Delivering a sufficient supply of homes Paragraphs 60 to 80
- 11. Making effective use of land Paragraphs 119 to 125
- 12. Achieving well-designed places Paragraphs 126 to 136
- 14. Meeting the challenge of climate change, flooding and coastal change Paragraphs 152 to 173
- 16. Conserving and enhancing the historic environment Paragraphs 189 to 208

These policies can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

London Plan (2021)

The main policies applying to the site are:

- GG1 Building strong and Inclusive communities
- GG2 Making the best use of land
- GG4 Delivering the homes Londoners need
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- D3 Optimising site capacity through design-led approach
- D4 Delivering good design
- D5 Inclusive Design
- D6 Housing quality and standards
- D7 Accessible Housing
- D8 Public Realm
- D12 Fire Safety
- H1 Increasing Housing supply
- H2 Small sites
- H4 Delivering Affordable housing
- H6 Affordable Housing tenure
- H7 Monitoring affordable housing
- H8 Loss of existing housing and estate redevelopment
- H9 ensuring best use of stock
- H10 housing size mix

These policies can be found at: <https://www.london.gov.uk/what-we-do/planning/london-plan>

Richmond Local Plan (2018)

The main planning considerations applying to the site and the associated Local Plan policies are:

Issue	Local Plan Policy
Local Character and Design Quality	LP1
Designated Heritage Assets	LP3
Non-Designated Heritage Assets	LP4
Archaeology	LP7
Amenity and Living Conditions	LP8
Local Environmental impact, Pollution and Land Contamination	LP10
Green Belt, Metropolitan Open Land and Local Green Space	LP13
Biodiversity	LP15
Trees, Woodland and Landscape	LP16
Climate Change Adaptation	LP20
Flood Risk and Sustainable Drainage	LP21
Sustainable Design and Construction	LP22
Waste Management	LP24
New Housing	LP34
Housing Mix and Standards	LP35
Affordable Housing	LP36
Sustainable Travel Choices	LP44
Parking Standards and Servicing	LP45
Parking Standards	Appendix 3

These policies can be found at:

https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf

Richmond Publication Local Plan (Regulation 19 version)

The Richmond Publication Version Local Plan (Regulation 19 version) and its supporting documents, including all the Regulation 18 representations received, was considered at Full Council on 27 April. Approval was given to consult on the Regulation 19 Plan and, further, to submit the Local Plan to the Secretary of State for Examination in due course.

The Publication Version Local Plan, including its accompanying documents, have been published for consultation on 9 June 2023. Together with the evidence, the Plan is a material consideration for the purposes of decision-making on planning applications.

The weight to be given to each of the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. As the Council considers the emerging Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Note that it was agreed by Full Council that no weight will be given to Policy 4 in relation to the increased carbon offset rate, and therefore the existing rate of £95/t will continue to be applied; in addition, no weight will be given to Policy 39 in relation to the 20% biodiversity net gain requirement at this stage; all other aspects and requirements of these policies will apply.

Where relevant to the application under consideration, this is addressed in more detail in the assessment below.

Issue	Publication Local Plan Policy	Compliance	
Living Locally and the 20-minute neighbourhood	1	Yes	No
Spatial Strategy: Managing change in the borough	2	Yes	No
Place-based Strategy for Teddington & Hampton Wick		Yes	No
Tackling the climate emergency	3	Yes	No
Minimising Greenhouse gas emissions and promoting energy efficiency	4	Yes	No
Energy Infrastructure	5	Yes	No
Sustainable construction standards	6	Yes	No
Waste and the circular economy	7	Yes	No
Flood risk and sustainable drainage	8	Yes	No
Infill and Backland Development	15	Yes	No
Small Sites	16	Yes	No
Managing the impacts of development on local surroundings	19	Yes	No
Local character and design quality	28	Yes	No
Designated heritage assets	29	Yes	No
Non-designated heritage assets	30	Yes	No
Views and vistas	31	Yes	No
Biodiversity and Geodiversity	39	Yes	No
Trees, Woodland and Landscape	42	Yes	No
Design process	44	Yes	No
Amenity and living conditions	46	Yes	No
Sustainable travel choices, Vehicular Parking, Cycle Parking, Servicing and Construction Logistics Management	47, 48	Yes	No
Local Environmental impacts	53	Yes	No

these policies can be found at

https://www.richmond.gov.uk/media/fomccpcf/publication_local_plan_low_resolution.pdf

Supplementary Planning Documents

- Design Quality
- Transport
- Refuse and Recycling Storage Requirements
- Residential Development Standards
- Hampton Wick & Teddington Village Planning Guidance
- Teddington Local Conservation Area Statement
- High Street Teddington Conservation Area Statement

These policies can be found

at: https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance

Other strategies or publications material to the proposal are:

- Community Infrastructure Levy
- Basements Article 4 Direction
- Teddington Local Conservation Area Statement
- High Street Teddington Conservation Area Statement

6. AMENDMENTS

The applicant originally submitted the application on 28th February 2023. They sent a full revised set of plans upon their own volition on the 9th May 2023.

7. EXPLANATION OF OFFICER RECOMMENDATION

The key issues for consideration are:

- Principle of Development - Sui Generis to Residential
- Heritage, Character and Design
- Neighbour Amenity
- Basement Development
- Highways and Parking
- Flood Risk
- Affordable Housing
- Residential Standards
- Biodiversity
- Trees
- Sustainability
- Waste
- Contamination
- Fire Strategy
-

Principle of Development - Sui Generis to Residential

Housing Growth

There is a strong drive for new homes under NPPF chapter 5. Delivering a sufficient supply of homes. Paragraph 69 sets out that a “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.”

London Plan (2021) Policy H2 Small sites outlines that ‘boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making.’

The Council's Local Plan LP34 outlines "the Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies."

A key policy in the determination of new housing applications is LP39 Backland & Infill Development which is set out below. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:

1. Retain plots of sufficient width for adequate separation between dwellings;
2. Retain similar spacing between new buildings to any established spacing;
3. Retain appropriate garden space for adjacent dwellings;
4. Respect the local context, in accordance with policy LP 2 Building Heights;
5. Enhance the street frontage (where applicable) taking account of local character;
6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;
7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;
8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;
9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.

The above policy requirements are discussed in the relevant section below. A Planning Statement by Cameron Jones Planning has been supplied dated February 2023. It is noted that objections have been received that the Planning Statement is inadequate.

There is no in principle objection to the change of use from Sui Generis (Garages) to accommodate a residential scheme. As noted, the planning history shows that residential has already been granted on this site via 17/0788/FUL which is now extant. Subject to the detailed requirements in the NPPF (2021), London Plan (2021) and LBRUT Local Plan (2018) the Council are supportive of an appropriate residential scheme coming forward in this location.

It should be noted that the site is not allocated in the current or emerging Local Plan. In the event housing were to come forward, it would be a windfall site which would support housing delivery in the Borough. Whilst there is some reliance on windfall sites, which play a valid role in achieving the Council's housing target, the site is not deemed critical to the Borough achieving this objective. Any residential scheme must adhere to the Council's Backland & Infill Development Policy LP39 as well as other relevant policies in the statutory Development Plan.

New Housing

Policy LP 35 Housing Mix and Standards sets out that "Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location." Unit 1 is for a 3-bedroom dwelling and unit 2 is for a 4-bedroom dwelling.

The Council welcomes family accommodation which is in high demand in the Borough. There is no objection in this regard. It is considered unusual however that unit 2 has a floor dedicated to providing two reception rooms when it already contains a reception room on the lower ground floor. While the Council would question the necessity of this, the layout would not warrant a refusal.

Character and Design

NPPF (2021) Paragraph 134 sets out that "development that is not well designed should be refused, especially where it fails to reflect local design policies."

London Plan Policy D3 Optimising site capacity through the design-led approach seeks to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and

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emerging street hierarchy. It outlines that developments should “respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.” Furthermore, developments should be “be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan.”

Policy LP1 of the Local Plan 2018 seeks to maintain and, where possible, enhance the high architectural and urban design quality which contributes to the character and heritage of the area. In order to achieve this, the following criteria must be assessed:

- Compatibility with local character
- Sustainable design and construction
- Layout, siting and access
- Space between buildings
- Inclusive design, connectivity, permeability (as such gated developments will not be permitted)
- natural surveillance and orientation
- Suitability and compatibility of uses

LP39 sets out that infill developments should meet the following criteria: Retain plots of sufficient width for adequate separation between dwellings; Retain similar spacing between new buildings to any established spacing; Respect the local context, in accordance with policy LP 2 Building Heights; Enhance the street frontage (where applicable) taking account of local character; and Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;

Emerging Local Plan Policy 28. Local character and design quality “Ensure the proposal is compatible with the local character, including the relationship to existing townscape, development patterns, views, local urban grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing”. It also states that developments should “Ensure the development takes account of the existing urban grain and development patterns, including relationship of heights to widths.”

The site is currently undeveloped and rundown, formerly being used as a series of garages on the site (Sui Generis). The area is now formed of an area of hardstanding, situated just outside of the Teddington Lock Conservation Area and the High Street Teddington Conservation Area. There are also a number of BTMs in the immediate vicinity of the site including no 28 Manor Road & 30 Manor Road adjacent to the west, Nos 25 – 29 Manor Road opposite the site and Nos 39 to 49 Twickenham Road north of the site.



Figure 6. Proposed Front Elevation

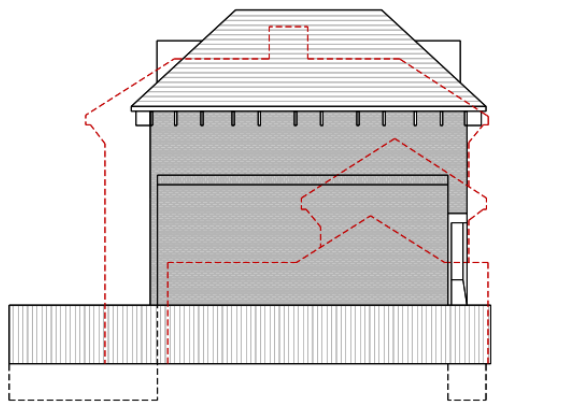


Figure 7. Proposed Rear Elevation



Figure 8. Proposed Side Elevation



Figure 9. Proposed Side Elevation



Figure 10. Street View

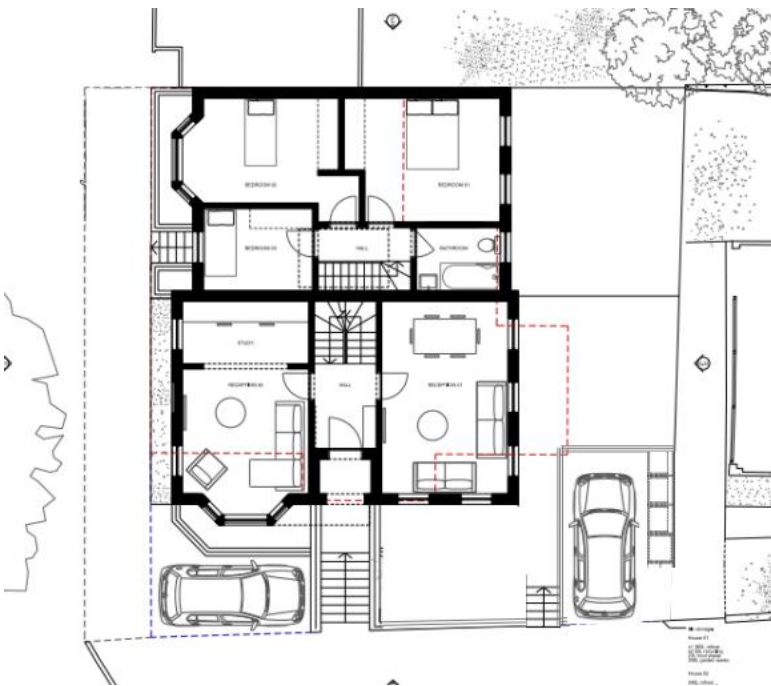


Figure 11. Roof Plan

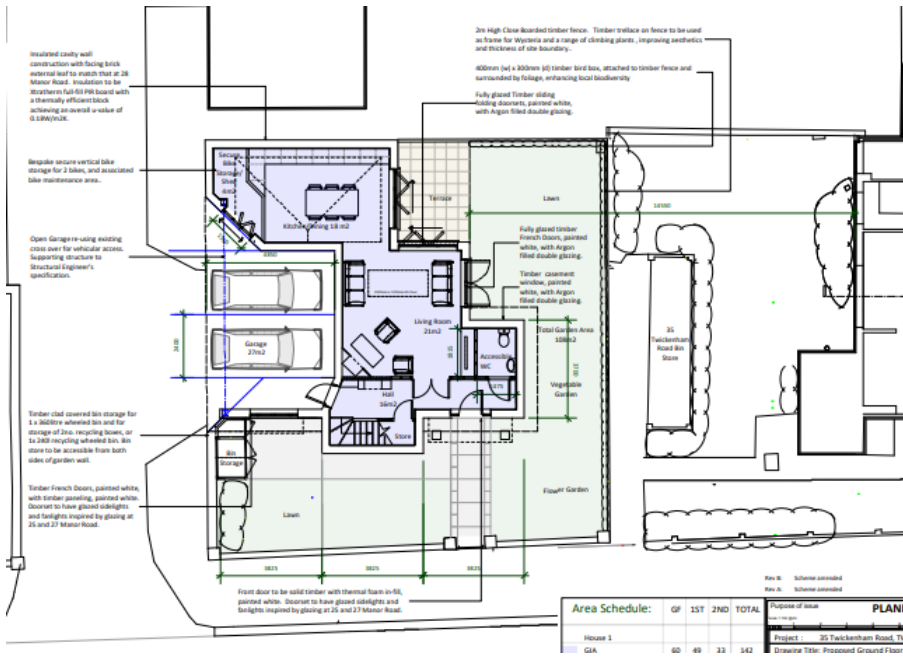


Figure 12. Proposed Layout 17/0788/FUL

Compatible with local character

It is noted that a Design and Access Statement dated Jan 2023 by Flower Michelin has been supplied. The site is located in the Cambridge Road and Surrounds Village Character Area 2 Hampton Wick & Teddington Village Planning Guidance.

It is important to consider the relationship to existing townscape, development patterns, views, local urban grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing when assessing if a development would be compatible with the local character.

The site has been subject of previous applications for development on this site, with the most recent being the residential consent of 17/0788/FUL. The proposals seek to amend the 17/0788/FUL application permission with a change to the form and height of the development. The traditional villa design approach is to be continued however the roof form of the northern section is to be simplified. It is noted that the proposed development would be taller with a flat roof over a rear 2-storey element.

The height of the development would not exceed the height of the adjacent buildings No. 28 Manor Road and No. 35 Twickenham Road. The front roof dormers are a defining characteristic of the area.

Objections have been received setting out that the application is larger than the refused scheme 16/2171/FUL and that this reason for refusal has not been addressed.

The overall design concept is considered acceptable, with the design reflecting the traditional villas of the surrounding buildings along Manor Road. However, a lower height and greater set back is required to ensure that the development would be subservient to the surrounding developments. The flat roof is also out-of-keeping with the Villa typology and is unsightly. Overall, its combined form, height and massing is considered significantly excessive.



Figure 13. Surrounding Context Cambridge Road and Surrounds Village Character Area

Layout, siting and access/space between buildings

The limited amenity space contains two car parking spaces. The surrounding residential dwellings typically benefit from generous plots. The limited amenity space is out of character with the surrounding buildings. The development would appear cramped on the plot. Additionally, it is noted that the consented scheme 17/0788/FUL benefits from a more spacious layout. Unit 1 contains 3 x reception rooms, 2 of which have no obvious function. In light of the constraints of the plot and the pattern of development in the immediate area, it is considered that the layout is overdeveloped.

Space between buildings

Objections have been received that there is inadequate spacing between dwellings. There is circa 12 - 14m separation between the flank wall of the proposed development and the rear wall of the block of flats at no. 35 Twickenham Road (depending on where the measurements are taken from as the walls are stepped). Again, the proposal appears overly cramped on the plot with insufficient separation distances being retained with surrounding buildings.

Detailing

One observation was received that the proposed fenestration shown in this application is very stark, lacking in any detail that would relate this building to the fine adjacent houses in Manor Road - which are Buildings of Townscape Merit. Had this application proven otherwise acceptable, a condition would be applied for further detailing of the fenestrations and materials to ensure that

these were up to standard. It is not considered that window details would equate to a reason for refusal.

Overall, it is considered that the plot layout is contrary to LP1 and LP39 of the Local Plan (2018) .

Heritage

Paragraph 203 of the NPPF states ‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

LP 3 also 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 4 Non-Designated Heritage Assets sets out that “the Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.”

It is noted however that the conservation area for Teddington Lock has since been extended to include the terraced group to the north of the application site.



Figure 14. Locally Listed Buildings (yellow)

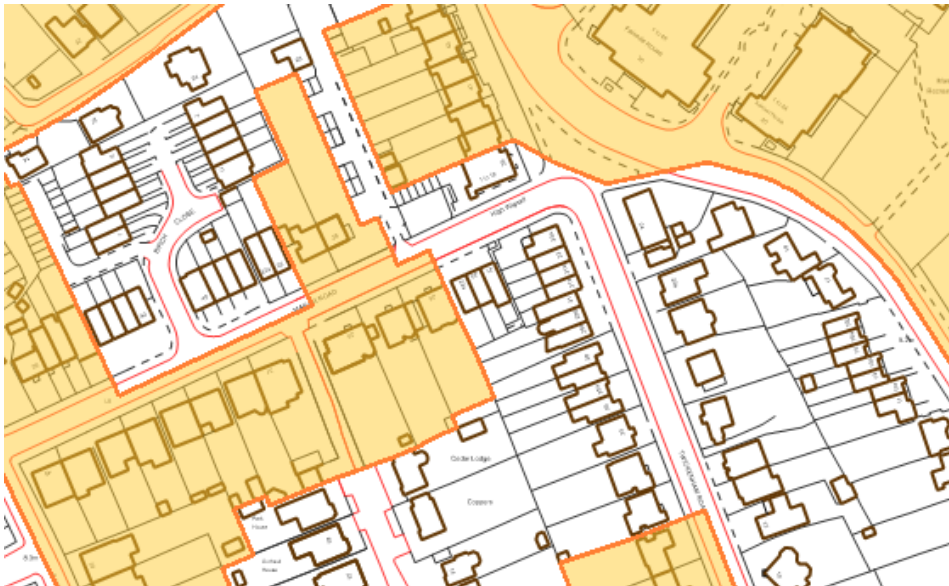


Figure 15. Conservation Areas

Heritage Significance

It is noted however that the conservation area for Teddington Lock has since been extended to include the terraced group to the north of the application site. The immediate surrounding BTMs include Nos 25 – 31 Manor Road. Opposite the site Nos 28 – 30 Manor Road. Nos 37 – 49 Twickenham Road to the North. The area is now formed of an area of hardstanding, situated just outside of the Teddington Lock Conservation Area and the High Street Teddington Conservation Area. The heritage significance is enshrined in the original traditional features of the residential dwellings along Manor Road.

Harm

The site is not in a Conservation Area, however it is located in its setting. The design of the development is traditional and sets out to reflect the overall character of the BTMS. The proposal is overly cramped on the plot, too bulky and the flat roof is unsightly; it is considered to detract from the setting of nearby BTMs and would cause 'less than substantial harm' to the appearance, character and views in and out of the Conservation Area.

Neighbour Amenity

London Plan Policy D6 sets out that "the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space."

Local Plan Policy LP8 states that development must protect the amenity and living conditions of existing, adjoining and neighbouring occupants. Design must allow for good daylight standards, avoid overlooking or noise disturbance, avoid visual intrusion, overbearing impacts or harm to the reasonable enjoyment of the uses of buildings and gardens. Harm may arise from various impacts such as noise, air pollution, odours or vibration.

Local Plan LP 39 sets out that developments should: result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions and result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.

Emerging Local Plan Policy 46. Amenity and living conditions

A. All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:

1. Ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;

2. Ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height massing or siting, including through creating a sense of enclosure;
3. Ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through the sense of enclosure;
4. Ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climate effects

A number of objections have been received on neighbour amenity grounds (in particular upon loss of daylight/sunlight, light pollution, overbearing, overshadowing, dominance, incongruous, unneighbourly) especially on residents within Nos 35, 37 and 39 Twickenham Road and No. 28 Manor Road.

Flats 1 – 12 No. 35 Twickenham Road

The proposal would be set back circa 11.7m from No.35 Twickenham Road (containing flats 1-12) rear projection. The front element of the proposal would be circa 11m (h) from ground level and 6m (w), with a two-storey rear extension at 5.75m (h) at the rear. The proposal's rear projection would be 14m from the primary rear wall of No. 35 Twickenham Road.



Figure 16. No 35 Twickenham Road

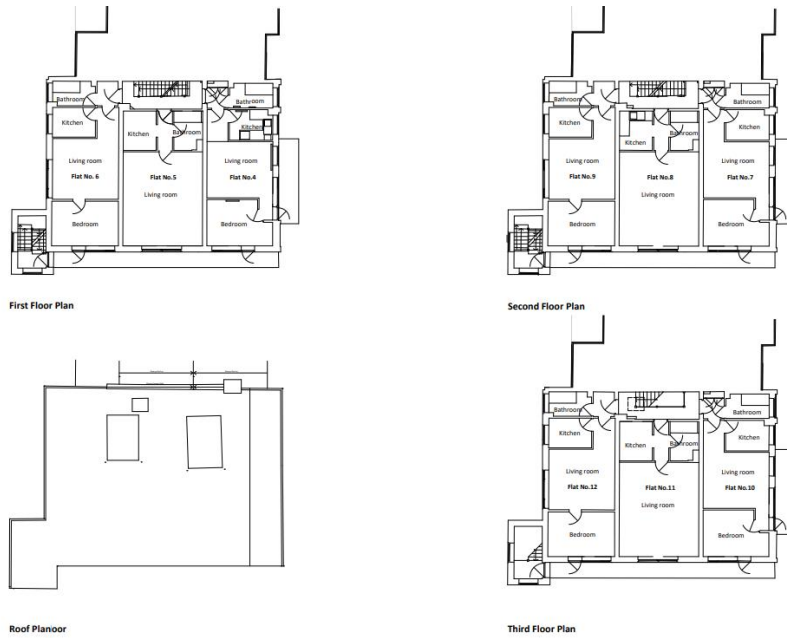


Figure 17. Floor Plans No. 35 Twickenham Road 19/1390/FUL

Daylight

The Daylight and Sunlight Assessment by Richard W Staif dated March 2023 sets out that “The attached analysis results demonstrates that that all windows bar one to 35 Twickenham Road retain daylight levels in excess of 27% VSC which is a level of daylight deemed acceptable in any circumstance. The window to 35 Twickenham Road who's retained VSC is below 27%, the reduction in daylight approximately 20% and therefore would not be discernible to the human eye.”

Vertical sky component (VSC) is the measure of the amount of light reaching a window. It is the ratio of that part of illuminance, at a point on a given vertical plane. The BRE Guidance (2022) at paragraph 2.2.6 sets out that an obstruction angle less than 25 degrees or at least 27% on a conventional window will usually give reasonable results. A VSC between 15% and 27% would according to the BRE Guidance require special measures i.e., larger windows and changes in room layout.

Daylight Analysis		Floor Name	Window Name	VSC Existing	VSC Proposed	Meets BRE Criteria
35 Twickenham Road	Ground (Living Room)	W1	28.34	22.48%	No	
35 Twickenham Road	Ground (Kitchen)	W2	35.82	31.76%	Yes	

Figure 18. Figures taken from Daylight Sunlight Assessment

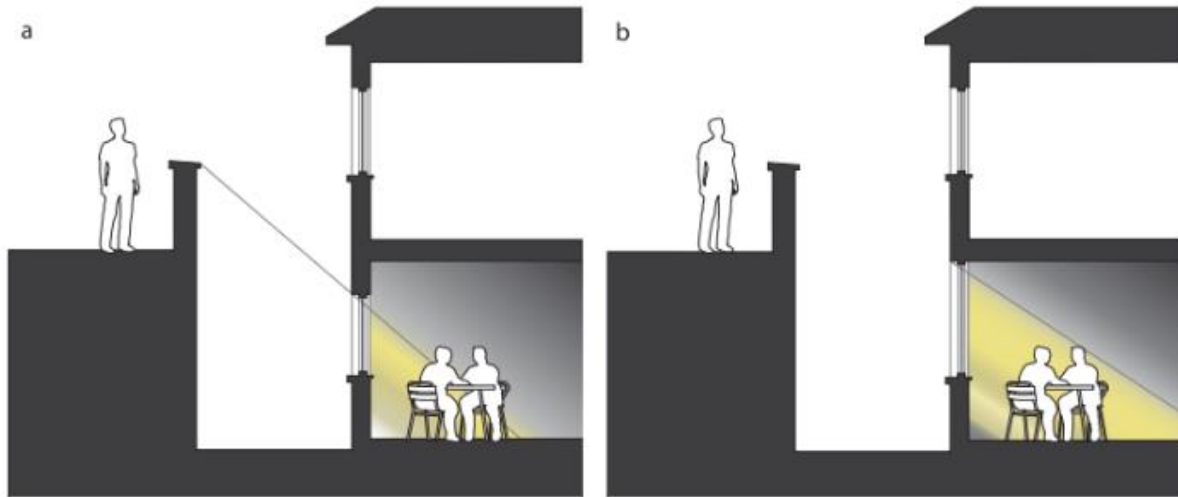


Figure 19.. BRE Guidance (2022) Extract Daylight Penetration Example (a) (15% - 27%) (b) Improved by Raised Window

The Council do not accept that the daylight levels of 22.48% VSC for window W1 are acceptable as 27% is the BRE baseline acceptable level. A lower percentage to this requires special measures as described in paragraph 2.1.6.

The approved scheme 17/0788/FUL was accompanied by a Daylight and Sunlight Report by Waterslade dated 29 June 2017. The approved scheme was set back a similar distance as this proposal with a graduated layout.

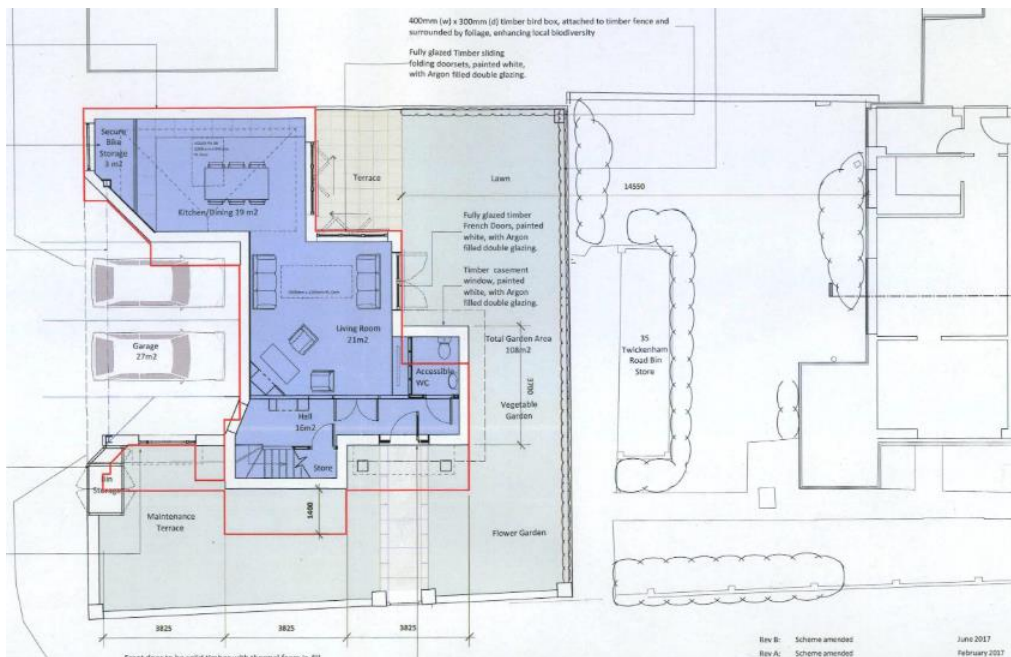


Figure 20. Site Plan Approved Scheme 17/0788/FUL



Figure 21. Approved Scheme 17/0788/FUL

The approved scheme was approximately 9.5m (h) with a chimney. The lower height and graduated design of the three tier pitched rooves serve to soften the development’s impact on No. 35 Twickenham Road in terms of overshadowing and visual impact.

The two lowest light levels for No. 35 Twickenham Road are set out below. It is evident that the proposal passed the BRE VSC test here upon this property.

Daylight Analysis	Floor Name	Window Name	VSC Existing	VSC Proposed	Meets BRE Criteria
35 Twickenham Road	R3/10 (Living Room)	W3/10	31.7	28.5	Yes
35 Twickenham Road	R3/11 (Living Room)	W3/11	33	31.2	Yes

Figure 22. Figures taken from Daylight Sunlight Assessment 17/0788/FUL

Sunlight

“With regard to sunlight, only the fenestration to 35 Twickenham Road meets the criteria for detailed analysis. One window does not achieve guidance, but this can be explained by the orientation of the window - being only just within 90 degrees of south - and the self obstruction of the outrigger to the property restricting the access to winter sun.”

The existing winter sunlight from window W1 be reduced from 5 to 1. It is recognised that the window had poor light levels anyway however this would make a poorly lit room dark which is unacceptable. This would be coupled with the loss of daylight as described above.

Sunlight Analysis	Floor Name	Window Name	Winter Existing	Winter Proposed	Meets BRE Criteria
35 Twickenham Road	Ground	W1	5	1	No
35 Twickenham Road	Ground	W2	15	9	Yes

Figure 23. Figures Taken From Daylight/Sunlight Assessment

The Council are concerned the development would result in unacceptable impacts on daylight and sunlight levels and the supplied report does not alleviate or address this.

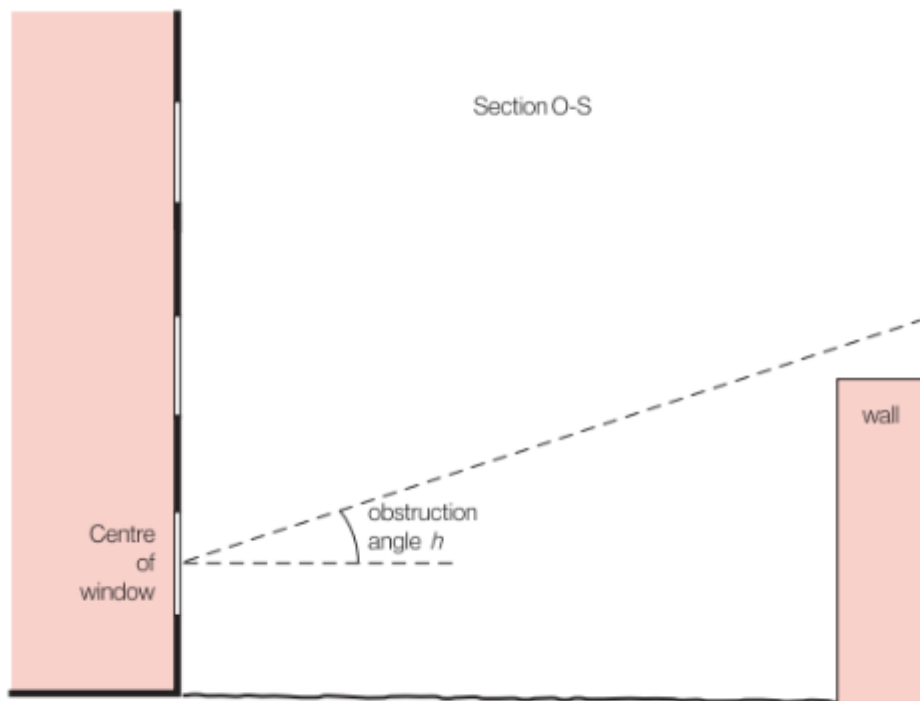


Figure 35: For passive solar gains in winter the sector AOB 30° either side of due south is important. To guarantee winter sun from this sector, obstructions within it should not subtend more than the critical angle h when measured in section. Table 1 gives values for h .

Figure 24. BRE (2022) 'Overshadowing'

Overall, the loss of daylight and sunlight upon No. 35 Twickenham Road is not considered acceptable.

No. 37 Twickenham Road

No. 37 Twickenham Road is sited to the north. The application site does not contain any rear windows. The proposal contains a number of side windows. The lower ground windows would contain glazed doors and a shower room window. The proposal contains 5 side windows serving a bedroom and a bathroom. At a roof level there is a window serving a bedroom. The proposal would involve some mutual overlooking however there is not a direct line of sight into No. 37 Twickenham Road which is further north. Owing to the siting between properties it is not considered that the proposal would warrant a refusal. The development would border No. 37's Rear garage.

Whilst there would be some overshadowing on No. 37's rear garden, it is not considered that this would be detrimental to the enjoyment of their rear amenity space.

Manor Road

There is over 14 metres from the flank wall of the application site and the flank wall of no. 28 Manor Road. The development would include 6 ground floor side windows serving habitable rooms, one first floor window serving a bedroom and 1 dormer window also serving a bedroom. The sites are bordered by landscaping. Owing to the degree of separation, and the site conditions, it is not considered that the proposal would result in overlooking such to warrant a refusal.

Noise

Objections were received in regard to noise and light pollution. Noise pollution would be addressed by a Construction Management Plan were this application to be acceptable.

Basement Development

Policy LP 11 Subterranean Developments and Basements sets out the below criteria that must be achieved in basement developments:

- extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);
- Demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.
- use natural ventilation and lighting where habitable accommodation is provided;
- include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, 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 Flood Risk and Sustainable Drainage;
- demonstrate as part of a Construction Management Statement (CMS) that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with the Local Environmental Impacts, Pollution and Land Contamination policy of this Plan) and will allow most vehicles to park and the doors to open sufficiently for passengers to alight.”

The ground floor is set below ground level. As such the proposal will need to meet the criteria of LP11 as set out above. The basement would not project significantly from the footprint of the existing dwelling. It is not adjacent to a listed building. Were this application to be acceptable, a CMS would be required via a condition. The applicant has supplied a Flood Risk Assessment including at Section 6 a Surface Water Drainage Strategy has been prepared by Aegaea dated November 2022. This sets out that the development would not increase or otherwise exacerbate flood risk on the site or beyond. There are no objections to the basement aspect of this proposal.

Approval in Principle by a Highway Structures Engineer

The applicant proposes to have a lower ground floor - the basement of 53 sqm for House 1 and 45 sqm for House 2. The proposed basement is close enough to the highway to require an approval in principle from the London Borough of Richmond's Highway Structures Engineer to ensure that the structural integrity of the highway is maintained when the basement is being built and throughout its lifespan. This approval in principle must be secured via a pre-commencement planning condition. Please see the link below for advice on what to include in this document: https://www.richmond.gov.uk/services/planning/basement_developments

Highway and Parking

London Plan (2021) T6 Car Parking sets out that “B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by

public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy."

Local Plan Policy LP44 states that in part D. that the Council should "ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks."

Local Plan LP45 sets out that "new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3."

Local Plan Policy LP 39 sets out that developments should "result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking."

Emerging Local Plan Policy 47. Sustainable travel choices Policy 47. Sustainable travel choices (Strategic Policy) A. The Council will work with others to bring about safe, sustainable, accessible transport solutions to reduce traffic congestion, reduce air pollution, including carbon dioxide emissions, improve public health, and improve access to services and employment.

A number of objections have been received on access to the site via the adjacent Private Road, car parking, sightlines, servicing and the proposed crossovers,

Access

Unit 1 is sited directly on Manor Road. Pedestrian access is off Manor Road with steps to the main house and steps into its lower ground floor. A car parking space is also located off Manor Road. Manor Road is a Highways Maintained Road.

For House 2, is located behind unit. Both pedestrian and vehicle access is off a Private Road. The applicant has failed to demonstrate that they have served notice on the owner(s) of this private road. Representations have been received which set out that the landowner(s) of this private road strongly object to its use as a form of access to this development. Whilst landownership issues are not a planning matter,

Were this application to be acceptable, a clear red line plan showing both the pedestrian and vehicle access routes to the site need to be produced. Evidence needs to be provided that adequate notice has been served on all of the landowners within the red line through a certificate B form. Evidence that due diligence in this regard has been followed has not been provided. From an access perspective this application is not acceptable.

Vehicular Parking

The applicant has included two off-street vehicular parking bays. For House 1, one off-street vehicular parking bay and for House 2, one on-street (pathway) vehicular parking bay, both include one electrical charging point.

PTAL of 2 and is not in a Controlled Parking Zone (CPZ). The applicant would need to provide for each dwelling two off-street parking bays to meet the maximum off-street vehicular parking standards set out in Appendix 3 of the Local Plan and one spaces to meet the maximum off-street vehicular parking standards set out in chapter 10 of the London Plan (2021).

The applicant initially tried to meet this standard by providing one parallel parking space on the private access road west of the site and one space on the site and accessed from the private road. They have not demonstrated that they have a right to park on this road.

A revised block plan was received to provide the additional space Updated Block Plan - Parking Layout 17 Apr 2023. This replaces the parking space from the side road to Manor Road, however as there is no crossover serving this car parking space. It is noted that the absence of sightlines on the drawings was a reason for refusal in 16/2171/FUL. In this case the car parking spaces were off the adjacent private road. However, they are necessary. There is also a lamppost in close proximity to this proposed car parking space which is completely unacceptable.

The Council's Transport SPD sets out that "5.19 Crossovers will be required to be located at least 2.5 metres from lamp columns, telegraph poles and other street furniture and road features such as speed cushions. This will ensure that the street furniture does not interfere with vehicle access and sightlines and the road features do not cause damage to vehicles when accessing a property."



Figure 25. Car Parking Layout

Additionally, the visibility splays of 2.4m by 2.1m as shown on the diagram below need to be achieved.

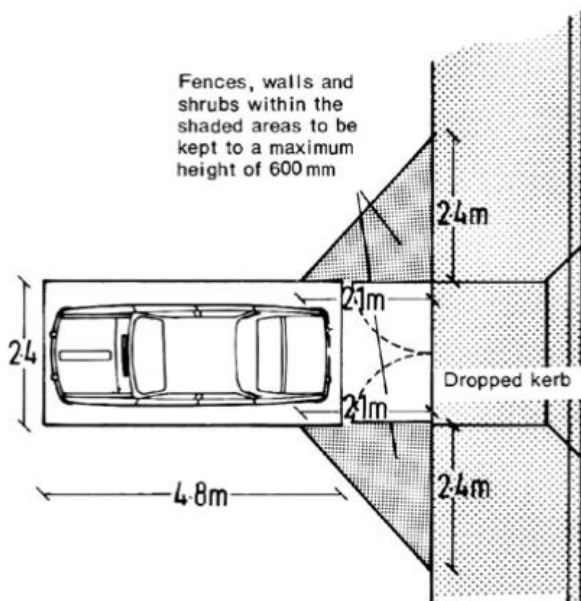


Figure 26. Transport SPD Extract Visibility Splays//Sightlines

This second car parking space is accessed from the private road but is parallel to the public footway and appears to be only 4.8m long and 2.4m wide. The adequate visibility splays have not been provided for this car parking space for the second car parking space.

Overall, the application's proposed access routes, proposed crossover and car parking spaces are inadequate such that would prejudice highways safety. The car parking spaces lack visibility splays and the car parking space 1 is in close proximity to a street light.

Cycle Parking

London Plan Policy T5 Cycling sets out that "developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3."

LP44 outlines sets out that the Council will "Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks."

Local Plan Policy LP45 states that new development should provide appropriate cycle access and sufficient, secure cycle parking facilities.

A minimum of two secure, covered cycle spaces are required per unit in line with policy T5 per unit. These have been provided. Were this application to be acceptable, the cycle spaces would be secured by condition.

Construction Management Plan

Objections have been received on vehicle access, noise and disruption during the construction phases. A draft Construction Management Plans have been supplied. These are not adequate. Were this application to be acceptable a construction management plan would be required through a condition.

Flood Risk

London Plan Policy SI 12 Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

London Plan Policy SI 13 Sustainable drainage outlines that "B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy: 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation) 2) rainwater infiltration to ground at or close to source 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens) 4) rainwater discharge direct to a watercourse (unless not appropriate) 5) controlled rainwater discharge to a surface water sewer or drain 6) controlled rainwater discharge to a combined sewer. C Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways. D Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation."

Local Plan LP 21 Flood Risk and Sustainable Drainage outlines that "all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere."

Basements and subterranean developments	
B. Basements within flood affected areas of the borough represent a particularly high risk to life, as they may be subject to very rapid inundation. Applicants will have to demonstrate that their proposal complies with the following:	
Flood Zone 3b (Functional Floodplain)	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will <u>not be permitted</u> .
Flood Zone 3a (Tidal / Fluvial)	<p>In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> • New basements: <ul style="list-style-type: none"> ○ restricted to Less Vulnerable / Water Compatible use only. ○ 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. Bedrooms at basement levels will not be permitted. ○ 'Highly Vulnerable' such as self-contained basements/bedrooms uses will not be permitted. • Existing basements: <ul style="list-style-type: none"> ○ No basement extensions, conversions or additions for 'Highly Vulnerable' uses. ○ 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. <p>In areas of Low or No Breach Hazard (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> • New basements: if the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms. • Existing basements: basement extensions, conversions or additions may be permitted for existing developments where they are <u>not</u> self-contained or used for bedrooms. <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
Flood Zone 2	<p>In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> • New Basements: if the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms. • Existing Basements: basement extensions, conversions or additions may be permitted for existing developments where they are <u>not</u> self-contained or used for bedrooms. <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
Flood Zone 1	No restrictions on new or extensions to existing basements

Figure 27. LP21 Extract Basements

Emerging Local Plan Policy 8 Part A. All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.

The site is in an Area Susceptible to Groundwater Flooding. It is in Flood risk Zone 1. This application includes a basement level.

A Statement of Sustainable Drainage Systems (SuDS) is required for all development where there is evidence of risk from flooding from other sources such as surface water, ground water and sewer flooding. A Flood Risk Assessment including at Section 6 a Surface Water Drainage Strategy has been prepared by Aegaea dated November 2022. Subject to a condition securing the measures in the flood risk assessment and surface water drainage strategy, there are no flood risk objections.

Affordable Housing

Local Plan Policy LP36 states some form of affordable housing contribution will be expected on all new housing sites. The Council will seek the maximum reasonable amount of affordable housing when negotiating on private residential schemes, further details are set out in the Affordable Housing SPD.

An Affordable Housing Statement has been supplied by Cameron Jones Planning dated February 2023. An Affordable Housing Viability Report has also been supplied by Andrew Gollard Associates dated November 2022. This has been independently reviewed by the Council's Viability Assessors Bespoke.

They have set out that an affordable housing contribution of £150,890 is viable. This has been agreed by the applicant. This would need to be secured by a legal agreement.

Residential Standards

Internal Space Standards

London Plan Policy D6 sets out that “housing development should be of high-quality design and provide adequately sized rooms (with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.”

Local Plan Policy LP 35 (B) requires new housing to comply with the nationally described space standard. These are set out in the London Plan Table 3.1 and the NDSS. It states the Council will only grant planning permission for new dwellings that provide adequate internal space and appropriate external private and/or communal amenity space to meet the needs generated by the development.

Objections have been received in regard to the space standards of the proposal. A Residential Standards Statement has been supplied by Cameron Jones Planning dated 28 February 2023.

Unit 1	3 bed x 4 person
Lower Ground	1x Reception Room
	1x Kitchen/Dining
	1x Shower Room
Ground Floor	1 x 2 person bedroom 2 x 1 person bedrooms 1 x 1 Bathroom
GIA	91 sqm
Amenity Space	36 sqm

Unit 2	4 bed x 8 person unit
Lower Ground	1 x Reception Room
	1x Kitchen/Dining
	1x Utility
	1 x Bathroom
Ground Floor	2 x Reception Rooms
First Floor	2 x 2 Person bedrooms
	2 x Bathrooms
Second Floor	2 x 2 person bedrooms
GIA	187 sqm
Amenity Space	43 sqm

Figure 28. Proposed GIA

Head height is at least 2.5m for a minimum of 75% of the gross internal floor in line excess of requirement and in line with the London Plan 2021.

Policy LP35 sets out that “90% of all new build housing is required to meet Building Regulation Requirement M4 (2) ‘accessible and adaptable dwellings’. A condition would be applied to secure this were the scheme to be acceptable. It is considered that the space standards have been adequately achieved. There is no objection to this.

Amenity Space

The requirements of Local Plan Policy LP35 Housing Mix and Standards and the Residential Development Standards SPD continue to apply to external amenity space.

The current Residential Development Standards SPD was adopted in March 2010 and sets out general guidance on amenity space. It seeks a minimum of 5 sqm of private outdoor space for 1-2 person dwellings and an additional 1sqm for each additional occupant. Policy LP 35(D) notes that amenity space for new dwellings, including conversions should be;

- private, usable, functional and safe
- easily accessible from living areas
- orientated to take account of need for sunlight and shading
- of a sufficient size to meet the needs of the likely number of occupiers
- accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space

Objections have been received in relation to the external amenity space. The proposal would exceed the open space requirements as set out in the Development Standards SPD. Unit 1 would contain circa 36 sqm of amenity space for 4 people. Unit 2 would contain 43 sqm of amenity space for 8 people. Were this application to be acceptable, a condition would be applied to ensure that this is functional, usable and of the standard set out in LP35 above.

Biodiversity

Local Plan Policy LP 15 Biodiversity sets out that the “Council will protect and enhance the borough's biodiversity. This will be achieved by “protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value.”

Emerging Local Plan LP39 sets out at Part 5. requiring the following development proposals to provide at least a minimum of 20% contribution towards delivering measurable Biodiversity Net Gain (BNG):

- a. small-scale householder applications which increase the footprint and/or floorspace of the existing dwelling;
- b. all development proposals, including conversions or changes of use, that result in 1 dwelling unit or more;
- c. non-residential development proposals which increase the footprint and/or floorspace;

The applicant has provided a Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment both by Phlorum dated November 2022. The site would introduce 0.12 biodiverse units comparable to its existing condition which is 0.01. An overall net gain of 2,292.03% in habitat units from the existing baseline has been calculated.

The Council's Ecologist has reviewed the evidence. Subject to conditions on external lighting, ecological enhancements, hard and soft landscaping works, a construction environmental management plan there is no objection to the development.

Sustainability

As of 1 January 2023, all major and non-major development should be assessed against the requirement for 35% on-site reduction above Part L 2021 (rather than Part L 2013). This requires a 55% reduction in CO2 emission reductions over Part L 2013.

Local Plan Policy LP 22 Sustainable Design and Construction sets out that all development that results in a new residential dwelling or unit including conversions, reversions, change of use and extensions that create one or more new dwellings need to meet the following standards: 35% reduction in CO2 emissions over Building Regulations (2013); submit energy statement; achieve National water standards - 110 l/p/d; and Submit Sustainable Construction Checklist.

Policy LP 10 stipulates that “the Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.”

Policy LP 20 sets out that “new development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption.”

Emerging Local Plan Policy 4 All development:

1. to reduce greenhouse gas emissions on-site in accordance with the London Plan’s Energy.

Hierarchy: a. Be lean: use less energy and manage demand during operation.

b. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. c. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and d. Be seen: monitor, verify and report on energy performance.

The applicant has supplied a Energy Report by Create Consulting Engineers LTD. This sets out that through the instillation of ASHPs and PV panels the scheme will achieve an improvement over the baseline scenario of approximately 59%, over Building regulations (2013) which is acceptable. This would be secured by a condition.

The applicant has supplied a National Water Standards Statement by Aegaea. This sets out that the scheme will achieve 105.69 litres/per person/per day including the 5 litres per person per day for external use. This is less than the maximum water consumption 110 litres per person per day. This is acceptable.

The applicant has supplied a Sustainable Construction Checklist. The development would score a total of 74 which ranks as an (A) the ‘Project strives to achieve higher standard in energy efficient sustainable development.’

Waste

Local Plan Policy LP24 sets out that “all developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities.”

Local Plan Policy LP39 also sets out that developments should “provide adequate servicing, recycling and refuse storage as well as cycle parking.”

Emergency Local Plan Policy 7 Waste and the circular economy. “All developments need to ensure that the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of the scheme, in accordance with policies on Local Character and Design.”

Refuse and Recycling Storage Requirements SPD December 2022 sets out that new residential developments should provide the following waste storage:

Number of bedrooms	Required refuse storage capacity (litres)	Number of 90 litre dustbins	Number of 55 litre recycling boxes	Number of 23 litre food waste containers	Number of 240 litre bins for garden waste (residential units with gardens only)
1*	100	2	2	1	1
2	170	2	2	1	1
3	240	3	2	1	1
4	310	4	2	1	1
5	380	5	2	1	1

*Incl. studio flats

Figure 29. LBRUT Refuse and Recycling Storage Requirements SPD December 2022 Extract

The site could be serviced off Manor Road and there is no objection to this. The applicant has provided one refuse and recycling bin store off-street for the two dwelling which need accommodate for 1 x 360l and 1 x 240l refuse bins and 4x 55l recycling boxes, 2 x 23l food waste containers and 2x240l bins for garden waste in accordance with the London Borough of Richmond’s supplementary planning guidance, and that these bins will be serviced from Manor Road. Four small bin areas have been provided on the eastern side of unit 1. No waste area is

shown for unit 2. The size of the waste areas are completely inadequate to serve two residential units of this size. Whilst waste details can be secured by a condition, there appears to be very limited scope to provide the minimum areas for the storage of waste for both units on the proposed block plan. The waste bins could be obstructed by the parked car on collection day. It is not clear how the residents of unit 2 at the back could get their bins out if the residents of unit 1 had car parked here. The Council object to the proposed waste areas. This aspect needs to be revised in any future submission.

Contamination

Policy LP10 outlines that “the Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.”

The Council’s Environmental Health Team have been consulted. The site is previously developed land which is currently vacant. To ensure that any new occupants of the future proposed housing scheme would not be subject to land contamination, were this application to be acceptable a condition would be applied requiring a Preliminary Risk Assessment (PRA) on the site. If contamination were to be discovered, further site investigation works would also be required.

Fire Safety

London Plan Policy D12 requires the submission of a Fire Safety Statement on all planning applications. The need for a fire statement became a policy requirement with the recent adoption of the new London Plan. Policy D12A states:

In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space: a) for fire appliances to be positioned on b) appropriate for use as an evacuation assembly point
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

A Fire Safety Statement by Cameron Jones Planning was supplied to the Council on 28 Feb 2023. This contains sections on means of escape, evacuation and equipment for firefighting. It is considered that this is adequate.

The applicant is advised that alterations to existing buildings should comply with the Building Regulations. This permission is NOT a consent under the Building Regulations for which a separate application should be made.

Reasons for Refusal 16/2171/FUL

The application 16/2171/FUL was for the demolition of 6 garages and construction of 2No. semi-detached dwelling units with associated garages and landscaping on land to the rear of 35 Twickenham Road. Refused Permission 02/11/2016

Affordable Housing

In the absence of a legal agreement to secure an appropriate contribution towards off-site affordable housing, the scheme fails to address the recognised housing need and will be contrary to, in particular, policy CP15 of the Core Strategy (2009), DM HO6 of the Development Management Plan (2011), Pre-Publication Local Plan Affordable Housing Policy LP 36, Supplementary Planning Document on Affordable Housing (2014) and the National Planning Policy Framework.

Affordable housing will be a reason for refusal in this application. See the Affordable Housing Section above.

Neighbour amenity

The proposed pair of semi-detached properties by reason of its size, siting, and close proximity to the boundary of the site would have a visually overbearing impact on the neighbouring properties, No. 37 and 35 Twickenham Road and would result in an unreasonable loss of light to the ground floor flats at 35 Twickenham Road, and would therefore be detrimental to the amenities of the occupiers thereof. It would thereby be contrary to policy DM DC 5 of the Development Management Plan and Supplementary Planning Document: Small and Medium Housing Sites.

The plot layout between the two developments are different, however this proposal would have a detrimental impact on the neighbour amenity of No. 35 Twickenham Road. This aspect of the above reason for refusal has not been addressed. See the Neighbour Amenity Section above.

Design

The proposed dwellings by reason of their poor design, massing and siting in close proximity to the site boundaries with 35 and 37 Twickenham Road, would result in a congested and intrusive form of overdevelopment which would be incongruous and detrimental to the character and appearance of the street scene and the setting of the surrounding Buildings of Townscape Merit. The proposal would thereby be contrary to policy, particularly CP7 of the London Borough of Richmond upon Thames adopted Core Strategy, policy DM HD3, DM DC1, DM HO2 and DM HO4 of the Richmond upon Thames Development Management Plan and Supplementary Planning Documents: Small and Medium Housing Sites and Design Quality.

Whilst there is a greater separation distance between this application and 35 Twickenham Road the proposal is taller than this refused scheme and overall is excessive in its bulk and mass. See the Character and Design Section above.

External amenity

The proposed houses by reason of restricted plot size fail to meet the Council's minimum external amenity space standards and detrimental to the amenities of the future occupants thereof. As such, the proposal is contrary to policy DM HO 4 and DM DC1 of the Development Management Plan 2011 and Council's Supplementary Planning Document: Residential Development Standards 2010.

The minimum space standards have been achieved. A condition would be applied to ensure that the quality of the space achieves baseline standards.

Sightlines

The proposal provides refuse and cycle storage facilities that obstruct sightlines at the vehicular access giving rise to an inconvenient and unsafe form of development prejudicial to pedestrian and highway safety.

The proposal is therefore contrary to policies DM TP 6 and 7 of the London Borough of Richmond Upon Thames Development Management Plan 2011 and Supplementary Planning Documents: 'Small and Medium Housing Sites' and 'Front Garden and Other Off-Street Parking Standards'.

The two proposed car parking would prejudice highway safety in this scheme. See the 'Highways and Parking' section above.

8. LOCAL FINANCE CONSIDERATIONS AND OTHER MATTERS

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. The weight to be attached to a local finance consideration remains a matter for the decision maker. The Mayor of London's CIL and Richmond CIL are therefore material considerations.

On initial assessment this development is considered liable for the Mayoral and Richmond CIL however this is subject to confirmation by the CIL Administration Team.

This is to notify you that had this development received planning consent it would be liable for a chargeable amount under the Community Infrastructure Levy Regulations 2010 (as amended by the Community Infrastructure Levy Regulations 2012).

Community Infrastructure Levy	
Mayoral CIL	£24, 449.82
Borough CIL	£80, 178.01

9. OTHER MATTERS

It is noted that objections have been received that the Planning Statement is inadequate. The accuracy of the street scene drawing has been questioned. Were this application to be acceptable, further measurements on this drawing would be requested.

10. RECOMMENDATION

This recommendation is made following careful consideration of all the issues raised through the application process.

For the reasons set out above, it is considered that the adverse impacts of allowing this planning application would significantly outweigh the benefits, when assessed against the policies in NPPF (2021) and Development Plan, when taken as a whole.

Refuse planning permission for the following reasons

Character and Design/Heritage

The proposed dwellings by reason of their poor design, bulk, height, massing and siting in close proximity to the site boundaries with 35 and 37 Twickenham Road, would result in a congested and intrusive form of overdevelopment which would be incongruous and detrimental to the character and appearance of the site, the street scenes and wider Cambridge Road and Surrounds Village Character Area and detracts from the setting of surrounding Buildings of Townscape Merit, the Teddington Lock Conservation Area and the High Street Teddington Conservation Area. The proposal would therefore be contrary to NPPF paragraph 134, LBRUT Local Plan (2018) Policy LP1, LP3, LP4, LP39, Emerging LBRUT Local Plan (2023) policy 15, 28 and 29 and the Hampton Wick & Teddington Village Planning Guidance SPD and the adopted Supplementary Planning Documents: Design Quality and Small and Medium Housing Sites

Neighbour Amenity

The proposed dwelling by reason of its size, siting, and close proximity to the boundary of the site would have a visually overbearing impact on the neighbouring properties, 35 and 37 Twickenham Road. It would result in an unreasonable loss of light to the ground floor flats at 35 Twickenham Road and would therefore be detrimental to the amenities of the occupiers thereof. The proposal would thereby be contrary to LBRUT Local Plan (2018) Policy LP8, LP39, Emerging LBRUT Local Plan (2023) Policy 15 and 46. and the adopted Supplementary Planning Documents: Design Quality and Small and Medium Housing Sites.

Highways and Servicing

Inadequate vehicle access has been provided for the 2 proposed car parking spaces. The proposed crossovers would owing to their inappropriate siting, layout and insufficient sightlines be prejudicial to pedestrian and highway safety. Insufficient provision for refuse and recycling storage is also proposed. The proposal would thereby be contrary to LBRUT Local Plan (2018) LP44, LP45, LP39 and LBRUT Emerging Local Plan Policy 15, 47 and 48. and the adopted Supplementary Planning

Documents: Refuse and Recycling: Storage and Access Requirements for New Developments and Transport.

Affordable Housing

In the absence of a binding obligation securing an appropriate financial contribution towards the provision of affordable housing within the borough, the proposal would be prejudicial to meeting the Council's affordable housing objectives contrary to LBRUT Local Plan (2018) Policy LP36, LBRUT Emerging Local Plan Policy 11 and the adopted Supplementary Planning Document: Affordable Housing.