

ATLAS

PLANNING GROUP

PLANNING STATEMENT

Land at Rear of 19-23 Friars Stile Road,
Richmond, TW10 6NH

September 2023

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Appendix A – Pre-application feedback

1. SITE DESCRIPTION

1.1 The application site is to the rear of 19-23 Friars Stile Road, with a frontage and existing access via Onslow Road. Currently the site comprises a row of redundant garages as shown in the photograph below. The site area amounts to circa 150sqm.



Figure 1: Site photograph

1.2 Adjoining the site to the south are the rear gardens of properties that front Friars Stile Road. To the north and west is Onslow Road, a street of residential properties.



Figure 2: Aerial view of the site (facing east)

1.3 The site is within the St Matthias Conservation Area, and Nos 19-23 are recognised by the London Borough of Richmond upon Thames as a Building of Townscape Merit (BTM) – a non-designated heritage asset for the purposes of the NPPF. Heritage considerations are discussed in detail within the Heritage Statement by HCUK Group which accompanies this submission.



Figure 3: Site Location



Figure 4: 19-23 Friars Stile Road (a BTM)

2. PLANNING HISTORY

2.1 The relevant planning history for this site is summarised below:

PRE-APPLICATION – 22/P0367/PREAPP

2.2 Pre-application advice was received from Richmond in December 2022. The feedback (included at Appendix A) provided was generally positive and can be summarised as follows:

- Subject to compliance with criteria set out at LP39, and demonstration that the loss of the garages will not lead to overspill parking the principal of the proposal can be considered acceptable on this site.
- A 3-bed home meets the criteria of preferring family sized dwellings in this location.
- No objection to demolishing the existing unattractive garages.
- Design approach supported and could represent enhancement to the site.
- The proposed house is set back from the road and appears subservient to other properties along Friars Stile Road
- The proposed stair core alterations are an improvement to existing and there are no objections.
- Further detail required regarding Daylight Sunlight Report.
- An alternative access/parking arrangement was recommended to be investigated.
- A Transport Statement should be provided.
- A full CMP should be provided.
- A sustainable Construction Checklist should be provided.
- An Energy Report should be provided.
- Affordable housing commuted sum calculation should be provided.
- SUDS details will be required.
- Fire Safety Statement required for validation.

2.3 Overall, the principal of the proposal was considered acceptable but further information would be required to address the above points.

PLANNING APPLICATION – 97/2684/FUL

2.4 The only application of particular relevance is 97/2684/FUL which was refused in 1998 and proposed the demolition of existing garages and the erection of seven garages with office space above.

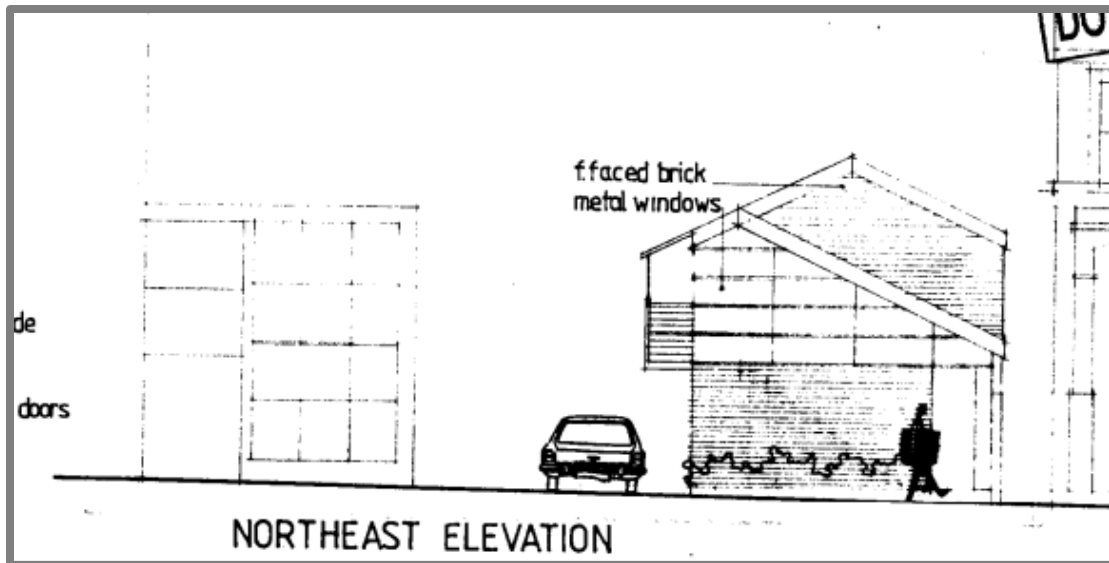


Figure 3: Refused scheme plan extract

2.5 The application was refused due to the two following reasons:

1. *“The proposed development by reason of its size, siting and design, would form an obtrusive feature in the streetscene and result in an overbearing and unneighbourly form of development which would be detrimental to the residential amenities of the locality, the setting of the adjacent Building of Townscape Merit and the character and appearance of this part of the St Mathias Conservation Area. The proposal is thereby contrary to Policies ENV 10, 13, 19 and 24 of the Unitary Development Plan.”*
2. *“The Proposal fails to provide sufficient off-street parking to accord with the Council’s car parking standards and as such is likely to result in obstruction caused by goods vehicles servicing the site and would thereby prejudice the free flow of traffic and conditions of general safety upon the highway. The proposal is thereby contrary to Policies TRN 22 and 23 of the Unitary Development Plan.”*

3. THE PROPOSAL

3.1 The application seeks permission for the demolition of the existing garages and the erection of a 3-bedroom residential dwelling (Use Class C3), parking, landscaping, store, and associated works, together with alterations and improvements to the existing rear stair core to 19-23 Friars Stile Road.



Figure 4 - Visualisation of new dwelling from Onslow Road

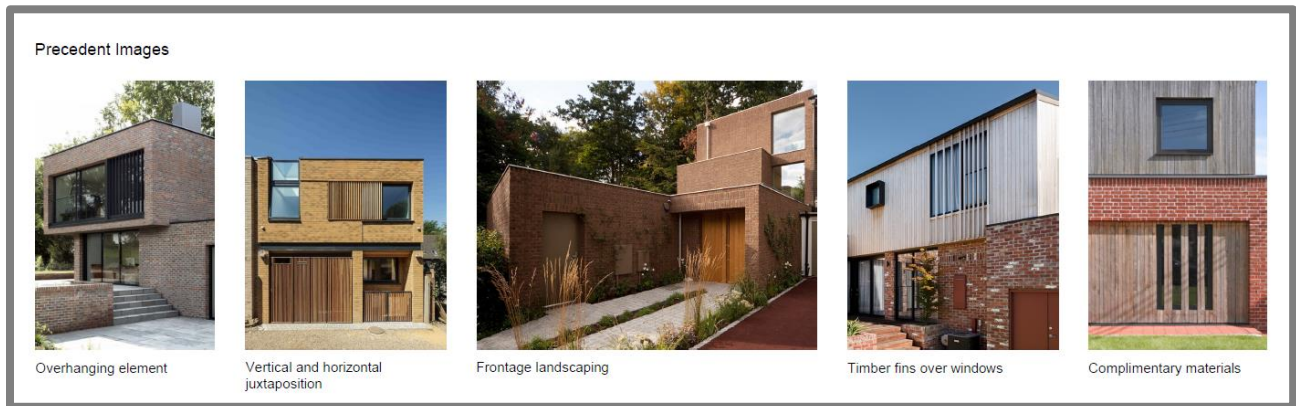


Figure 5 - Precedent Images

THE APPLICANT

3.2 The Malins Group, the applicants and owners of the site, are a second-generation family business whose commercial activities include both residential and commercial property investment and development.

3.3 The investment division owns and manages a selection of multi let commercial and residential assets. The development division specialises in the restoration of historic or interesting buildings and the regeneration of redundant or failing tertiary commercial areas.

3.4 Examples include:

- The Apple Apartments, a listed building, with a blue plaque, sympathetically restored to enhance the original history of the building.
- The Book House, locally listed building, with blue plaque, that was the home of The Booker Prize and a notable building during the Second World War. Beautifully refurbished retaining all original features.
- The Metal Works in Clapham, built on the site of the former Art Metal Works of William Bainbridge Reynolds, was brought back to its former glory through painstakingly returning all removed period features back to the site. This site now also has a worthy blue plaque.
- North Street Arcade and The Carisbrooke Centre are both examples of tertiary shopping areas that were successfully regenerated by the Malins Group, to provide a thriving mixed-use environment despite today's rather bleak outlook for our high streets.

3.5 As a company they are passionate about community and heritage, and we trust that this is evident from the quality of the proposals presented.

4. PLANNING CONSIDERATIONS

PRINCIPLE OF DEVELOPMENT

4.1 The proposal seeks to demolish the existing dilapidated garages and replace them with a modern family home within a predominantly residential area.

4.2 Policy LP39 *'Infill, backland and backgarden development'* sets out how the following factors should be addressed:

- 1. Retain plots of sufficient width for adequate separation between dwellings**
- 2. Retain similar spacing between new buildings to any established spacing**
- 3. Retain appropriate garden space for adjacent dwellings**
- 4. Respect the local context, in accordance with policy LP2 Building Heights**
- 5. Enhance the street frontage (Where applicable) taking account of local character**
- 6. Incorporate or reflect materials and detailing on existing dwellings**
- 7. Retain or re-provide features important to character, appearance or wildlife**
- 8. Result in no unacceptable adverse impact on neighbours including loss of privacy to existing homes or gardens**
- 9. Provide adequate servicing, recycling and refuse storage as well as cycle parking**
- 10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.**

4.3 The next sections of this Statement demonstrate how these 10 criteria have been met by the proposals.

4.4 Additionally, Policy LP 36 requires contributions to affordable housing from all small sites. In accordance with Policy LP36, a commuted sum calculation based on 5% is submitted as part of the application (£50,143).

CHARACTER AND APPEARANCE OF THE AREA

4.5 As existing, the application site comprises a set of run down, redundant garages with asbestos roofs, hardstanding, cluttered 'back of house' of the Friars Stile Road commercial units and unattractive stair core to 19-23 Friars Stile Road.

4.6 These are seen together in views from both Onslow Road and the junction with Friars Stile Road. In contrast to the quality of the immediate surroundings, this neglected composition is a considerable detractor to the conservation area, particularly given the relative prominence of its position.



Figure 6 - Application site from Onslow Road



Figure 7 - Application site from Onslow Road

4.7 Given this existing condition, there is therefore an exciting opportunity for the creation of a unique, high quality scheme which can improve the character and appearance of this part of the conservation area, and better reveal the significance of the Building of Townscape Merit. As detailed in the Heritage Report, *“this design response improves, as well as secures, the long-term use of a small, neglected, backland plot, restoring quality to an existing Building of Townscape Merit and helping to better reveal, and make reference to, the connection to the well-known architects Eric Lyons, Geoffrey Paulson Townsend and Span Developments, providing a stimulating environment to inhabit”*.

4.8 Indeed, once redundance and neglected infill plots such as this site, are an incredibly valuable resource for Londoners. They play a role in windfall housing supply, but perhaps more importantly they present opportunities to create high quality, often surprising, innovative architecture driven by their tight constraints. Across London there are numerous examples of how similar plots to this have been utilised creatively and playfully to create high-quality, award-winning architecture.

4.9 The pre-app feedback commended the design stating, *“whilst contemporary in build, it is considered that due to the high standard of design with relation to Friars Stile Road facing BTM, coupled with the subservient nature to the properties along Onslow Road, that the scheme would not result in harm to the conservation area nor the nearby BTMs and could be acceptable subject to other policy compliance”*.

4.10 Lastly, the pre-app feedback also supported the stair core alterations noting them as an improvement to the existing situation.

PRECEDENTS - HIGH QUALITY INFILL

WITTERING HOUSE, HACKNEY

4.11 Careful design has allowed this two-bedroom house to occupy a very small street facing plot in-between neighbouring Victorian Villas. The architecture is sympathetic to its location and subservient to the historic villas whilst still maintain its own contemporary identify. Careful choice of materials has further allowed the new home to blend with its neighbours.

4.12 Wittering House has since the achieved the top prize, the Grand Prix Trophy, at the Evening standard New Home Awards 2018, and is featured within the Mayor’s Housing Design SPG as an exemplar of high-quality infill.



Figure 8 - Wittering House - High quality contemporary infill in Hackney

GINGERBREAD HOUSE, HACKNEY

4.13 Built on the site of a former box factory, Gingerbread House makes the most of a small urban plot in Hackney. The two-storey home sits behind the reconstructed factory wall, and tall, north-facing windows overlap the mismatched brickwork and avoid overlooking surrounding neighbours. The upper level of cedar shingle earned the property – designed for the architect herself – its nickname, and inside, walls and ceilings are lined with timber panels.



Figure 9 - Site of the Gingerbread House as existing



Figure 10 - Gingerbread House upon completion

GAP HOUSE, BAYSWATER

4.14 At just 8ft wide, and a former side alley, Gap House cleverly sits between two listed buildings in a conservation area. Contemporary, but complementary materials, ensure the building is in-keeping, whilst retaining its own unique character. The architect's stated aim with the project was to create a 'listed building of the future' and the quality of the property has been recognised with multiple RIBA awards where the judges commented '*The house is a fine example of design in a tight urban site*'.



Figure 11 - Gap House, Bayswater



Figure 12 - Gap House, Bayswater

SUNKEN HOUSE, HACKNEY

4.15 Sunken House by David Adjaye is a 3000sqft, three storey infill dwelling in the De Beauvoir conservation area, Hackney. It sits amongst Victorian semi-detached villas and when seen in the street, the minimal cube appears simple but marks architectural punctuation by being sympathetic and unblended in the existing streetscape.



Figure 13 - Sunken House, De Beauvoir conservation area



Figure 14 - Sunken House, De Beauvoir conservation area

MARYLAND HOUSE, STRATFORD

4.16 Distinctly contemporary, marking the end of a Victorian terrace, Maryland House feels immediately modern, yet respectful to its traditional neighbours. Use of London stock brick references the materials and tonality of the Victorian and post-war neighbours.



Figure 15 - Maryland House, Stratford

THE DESIGN PROPOSALS

4.17 As detailed within the accompanying Heritage Statement, 19-23 Friars Stile Road was designed by Eric Lyons, and is highly reflective of his now well know Span housing developments. In reverence to this, the new dwelling is proposed in a modernist style, in-keeping with the Lyons vernacular. Articulated volumes and simple architectural detailing is proposed, forming clean lines and avoiding visual clutter.

4.18 The dwelling has been intentionally set back from the existing row of houses to the north so as not to compete visually in the streetscene, with a clear subservience to traditional neighbouring properties of the conservation area.

4.19 The proposal takes references from the surrounding area in terms of materiality and tone. Red brick is used to tie the building with 19-23 Friars Stile Road, whilst timber cladding is used as a secondary, accent material which reflects the tone of the London stock brick prevalent on dwellings along Onslow Road and the wider conservation area.



Figure 16 - Proposed visualisation from Onslow Road

4.20 In addition, the now poor-quality stair core fronting the road will be rebuilt. This element will be reconstructed to draw the new dwelling and original Lyons' development together in terms of form and materiality, reinstating the important visual cohesion that has been lost.

4.21 Overall, it is considered that the proposals will be viewed as a positive addition to the conservation area, resulting in an enhancement as a whole.

QUALITY OF ACCOMMODATION

4.22 Policy LP35 (B) requires new housing to comply with the nationally described space standard (NDSS) The NDSS states the following:

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

4.23 The proposal seeks to create a 3 storey 3b6p dwelling with a GIA of 153sqm and as such far exceeds the NDSS of 108sqm. All habitable rooms have been designed with good access to natural light and ventilation.

4.24 Policy LP8 outlines that developments will be required to protect the amenity and living conditions of the new occupants of the building. In terms of external amenity space, standards are set within the Residential Development Standards SPD. This seeks a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm for each additional occupant. The proposed garden space exceeds the minimum requirements given c.30sqm is provided.

IMPACT UPON NEIGHBOURS

4.25 Policy LP 8 of the Local Plan outlines that in considering proposals for development, the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

4.26 In terms of overlooking, windows are orientated front and back to prevent any views of near neighbours at 19-23 Friars Stile Road and 1 Onslow Road.

4.27 In terms of loss of sunlight / daylight to neighbouring properties, an assessment has been prepared by Right of Light Consulting. This concludes that all neighbouring windows (that have a requirement for daylight

or sunlight) pass the relevant BRE diffuse daylight and direct sunlight tests. The development also passes the BRE overshadowing to gardens and open spaces test.

4.28 Following pre-app advice, further feedback from Right of Light Consulting has been sought and accompanies the application submission. In summary, Right of Light's letter dated 19/05/23 reiterates that they are comfortable the adjoining property would not be affected by daylight/sunlight impacts.

IMPACT UPON HIGHWAYS

4.29 Paragraph 111 of the NPPF states that development should only be prevented or resisted if the residual or cumulative impacts on the highway would be severe. Local Policy LP 45 details the Council's 'Parking Standards and Servicing' requirements details how new development must make provision for the accommodation of vehicles in order to provide for the needs of the development whilst minimising the impact of car-based travel.

4.30 The proposed parking arrangement has been amended since pre-app stage, as shown below:



Figure 17: Pre-app arrangement

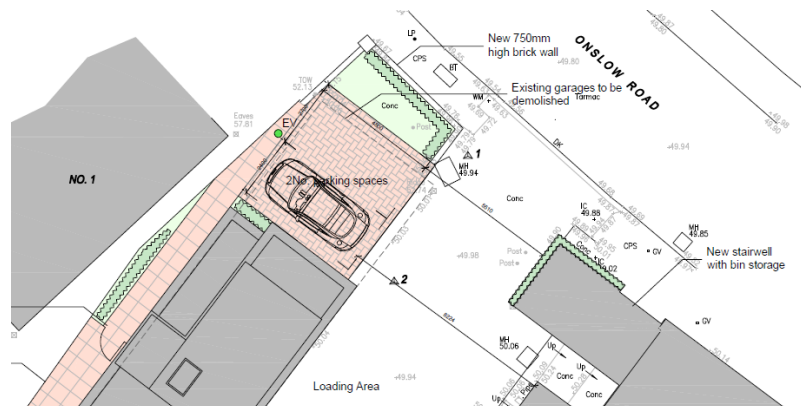


Figure 18: Proposed arrangement

4.31 Paul Basham Associates have provided a Technical Note to accompany the application. Their note can be summarised as follows:

- Pedestrian facilities within proximity of the site are excellent.
- Richmond train station is an approximate 12-minute walk away.
- Two parking spaces is appropriate having regard to the Parking SPD
- Cycle parking for two bicycles will be provided
- Refuse collection will occur from Onslow Road.
- A fire tender is able to get within 45m of all parts of the building.
- The change in trips generated by the site is likely to be negligible, or indeed could constitute a reduction given that the garages could generate a higher number of trips within their lawful use.

4.32 Taking the above into account, the proposals are considered acceptable with regard to highway safety.

ENERGY

4.33 Policy LP 22 '*Sustainable Design and Construction*' states that developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change.

4.34 Jaw have prepared an Energy and Sustainability Statement to accompany the application which demonstrates the proposal is achieving an improvement of 60.96% CO2 emissions.

4.35 This CO2 improvement follows the energy hierarchy, incorporating passive design measures and energy efficient equipment. The development employs an efficient building fabric, including highly efficient insulation and highly efficient glazing, and an ASHP to maximise carbon savings for the site.

4.36 Water fittings will be specified with the following or similar flow rates to meet the target water consumption of 105L/per person/per day:

- Wash basin taps – 6.5l/min
- Showers – 7.5l/min
- Bath – 120l to overflow
- Dishwasher – 1.2l/place setting
- Washing machine – 9l/kg load
- WC – 6/4 litre dual flush

- Kitchen taps – 6.5 l/min

4.37 Overall, the proposal will be a modern and sustainably designed dwelling according with the requirements of Policy LP22, the London Plan and the NPPF.

DRAINAGE

4.38 Policy LP 21 '*Flood Risk and Sustainable Drainage*' sets out how 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. It also requires the use of sustainable drainage systems in all development proposals.

4.39 Farrow Walsh have prepared a Flood Risk Assessment and Drainage Strategy to accompany the application. The report concludes:

- The site is at very low risk of flooding from overland flow routing from surface water and can be mitigated against by raising vent bricks and electrical sockets, as well as using sealed doors on all access points
- The proposed surface water discharge rate offers a betterment to the existing brownfield runoff rates for all storm events with the use SUDS to treat and delay runoff entering the watercourse network.
- The site is at negligible risk of flooding from its own private drainage systems; however, this can be mitigated against by regular maintenance in accordance with the maintenance strategy.

4.40 Overall, the proposal accords with local and national planning policies that have regard for flood risk and drainage.

5. CONCLUSION

5.1 The application site comprises a row of existing garages set behind a row of commercial units with flats above. The proposal subject of this application seeks permission for the demolition of the existing garages and the erection of a 3-bedroom residential dwelling (Use Class C3), parking, store, landscaping and associated works, together with alterations and improvements to the existing rear stair core to 19-23 Friars Stile Road.

5.2 The proposal has been carefully designed to ensure that:

- ✓ It complies with local and national planning policies, particularly LP39;

- ✓ It will respect and enhance the character and appearance of the area;
- ✓ It will ensure a high standard of residential amenity is maintained for the nearest neighbours;
- ✓ It will provide a high standard of residential amenity for the future occupants; and
- ✓ It provides safe access and sufficient parking for future occupiers.

5.3 We therefore comment the proposals to you.

A

Environment Directorate
PLANNING

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website: www.richmond.gov.uk

Our ref: 22/P0367/PREAPP

Contact: Jack Davies
Telephone: 02088911411
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Dan
dan@atlasplanninggroup.co.uk

12 December 2022

BY EMAIL ONLY

Dear Dan,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

LOCATION: REAR OF 19-23 FRIARS STILE ROAD RICHMOND
PROPOSAL: DEMOLITION OF THE EXISTING GARAGES AND THE ERECTION OF A 3-BEDROOM RESIDENTIAL DWELLING (USE CLASS C3), PARKING, LANDSCAPING AND ASSOCIATED WORKS, TOGETHER WITH ALTERATIONS AND IMPROVEMENTS TO THE EXISTING REAR STAIR CORE TO 19-23 FRIARS STILE ROAD.

I write in reference to your request for pre-application advice received 14 November 2022. The following is a summary of the video meeting held on Tuesday 06 December.

- It is understood that this pre-application scheme is in relation to the demolition of existing garages and erection a 3 bedroom detached dwelling over 3 storeys and a basement. The scheme also includes alterations to the existing stair core of 19-23 Friars Stile Road.
- The proposal site, whilst addressed on Friars Stile Road actually fronts Onslow Road. The site is located within the St Matthias Richmond Conservation Area. The property to which the site is to the rear of is designated as a BTM as is the row of buildings to the west of the subject site along Onslow Road. The site features a row of garages along the western boundary with the rest of the site covered by tarmac, with what appears to be service and refuse storage areas for the ground floor commercial properties which front Friars Stile Road.
- The local Planning Policies relevant to the application would be as follows:
 - Local Plan 2018
 - Policy LP1 Local character and design Quality
 - Policy LP3 Designated Heritage Assets
 - Policy LP4 Non-Designated Heritage Assets
 - Policy LP8 Amenity and Living Condition
 - Policy LP22 Sustainability
 - Policy LP24 Waste Management
 - Policy LP34 New Housing
 - Policy LP35 Housing Mix and Standards
 - Policy LP36 Affordable Housing
 - Policy LP39 Infill, Backland and Backgarden Development
 - Policy LP44 Sustainable Travel Choices

- Policy LP45 Parking standards and servicing

Supplementary Planning Documents

- Refuse and Recycling
 - Design Quality
 - Sustainable Construction Checklist
 - Buildings of Townscape Merit
 - Residential Development Standards
 - Refuse and Storage Requirements
 - Transport
 - Conservation Areas
- The London Plan policies relevant to the application would include:
 - G1 Building strong and Inclusive communities
 - G2 Making the best use of land
 - G4 Delivering the homes Londoners need
 - D3 Optimising site capacity through design-led approach
 - D4 Delivering good design
 - D5 Inclusive Design
 - D6 Housing quality and standards
 - D7 Accessible Housing
 - D12 Fire Safety
 - D14 Noise
 - H1 Increasing Housing supply
 - H2 Small sites
 - H10 housing size mix
 - HC1 Heritage conservation and growth

Principle

- The applicant seeks advice relating to the demolition of the existing garages and construction of 1 x three bed dwelling over 3 storeys.
- The application site is located on land to the rear No.19-23 Friars Stile Road, and therefore the proposals comprise 'backland development'. Local Plan Policy LP39 provides guidance on backland development, stating:

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.
- Subject to compliance with the above and demonstration that the loss of garages will not lead to overspill parking harmful to highway safety, the principle of the proposal can be considered acceptable on this site.
- It is noted that the subject site is located outside of a main centre boundary and therefore family sized dwellings are preferred. The proposed 3 bedroom house meets this criteria.

Design

- The existing garages are not considered to contribute to the importance of the Conservation Area, and therefore there is no objection to their demolition.
- It is considered that the proposed development could represent an enhancement to the existing situation with the removal of the run down, poor quality garages. It is noted that the proposed dwelling is of contemporary build and is much taller than the existing garages. Whilst contemporary in nature it is appreciated that the build has design elements which reflect the BTM to which it is rear of. The proposed alterations to the stair core of this BTM will front the street and soften the appearance of the new dwelling through the use of similar high quality materials.
- Whilst the proposed new dwelling does not reflect the appearance of the neighbouring BTMs along Orleans Road it is appreciated that the proposal is set behind the front building line of these properties and is much smaller thereby appearing subservient.
- It is noted that the existing situation allows views over the rear gardens of properties along Friars Stile Road. Due to the siting of the proposals there will remain views into the garden between the proposed development and the existing building at Nos 19-23. It is therefore not considered that the uplift in this location will be harmful in respect of the existing open views.
- As such, whilst contemporary in build, it is considered that due to the high standard of design with relation to the Friars Stile Road facing BTM, coupled with the subservient nature to the properties along Orleans Road, that the scheme would not result in harm to the Conservation Area nor the nearby BTMs and could be acceptable subject to other policy compliance.
- It is considered that the proposed stair core alterations are an improvement to the existing situation and there are no objections.

Residential Development Standards

- The proposed scheme must adhere to space standards prescribed in the 'Nationally Described Space Standards' - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf
- The London Plan prescribes the ceiling heights should be minimum 2.5m for 75% of the floor space. It was discussed that the current proposed floor to ceiling height is 2.4m. It is strongly advised to meet the London Plan requirement for 2.5m or else provide strong justification for shortfall.
- The requirements of Policy LP35 (C and D) and the Residential Development Standards SPD apply to external amenity space. A minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant. The proposals include outdoor space at the lower ground and ground floor levels.
- All habitable rooms should be of adequate size in accordance with the NDSS and should provide adequate access to sunlight and provide outlook.

Neighbour Amenity

- It is noted that the applicant has submitted a daylight sunlight report in which the conclusions are in favour of the proposed development. However it is noted that the report identifies that the proposals would be in contravention of the BRE guidance in terms of the Vertical Sky Component and Daylight Distribution Tests. The report justifies this contravention by detailing that: *However, the BRE guide explains that another important issue is whether an existing neighbouring building is itself a good neighbour, standing a reasonable distance from the boundary and taking no more than its fair share of light. The guide goes on to explain that where existing neighbouring buildings sit close to the boundary, as with 1 Onslow Road, alternative targets may be applied. The methodology for setting new targets is set out in Appendix F of the guide. The alternative Vertical Sky Component targets are derived by calculating the level of light that the window would achieve if obstructed by a hypothetical 'mirror-image' of the existing neighbouring building, an equal distance away from the boundary.*
- In this however, the application site is used for garages/servicing to the rear of a mixed use building where the scope for a 'mirror image building' is likely to be unattainable. Although the existence of side facing windows to No.1 Onslow Road may not be particularly neighbourly, given the urban existing context, No.1 being at the end of a consistent row of semi-detached dwellings

and constraints of the surrounds it is not considered unreasonable that side facing windows exist to benefit this property. The council therefore does not consider the approach in the sunlight/daylight report to be justified and as such the impact to the side facing windows of No.1 Orleans Road is not considered justified and the Council object on grounds of appearing overbearing, visually intrusive and resulting in loss of sunlight.

- It was however noted at the meeting that the applicants are not aware of the internal layout of No.1 Orleans Road. It is noted that side facing windows are often incorporated to service bathrooms or stairwells. If evidence could be presented which demonstrates that the windows do not serve habitable rooms then the council could reconsider its objection.
- The proposal would project modestly rear of No.1 Orleans Road and it is not expected to appear overbearing to the rearwards openings.
- Given the separation from No.17 Friars Stile Road and the stepped design of the upper floors it is not considered the proposal will appear overbearing to this property. The rear opening of this property also have unobstructed outlook to the west.
- The impact on residential properties on Nos 19-23 Friars Stile Road is justified within the sunlight/daylight report. The applicant should demonstrate at application stage that the proposal does not appear overbearing to these properties. Knowing the internal arrangements would be beneficial.
- It is noted that the only side facing window is high level which is appropriate to ensure privacy is safeguarded. The front facing windows are distanced from the properties on the adjacent side of Friars Stile Road so as not to result in opportunities to overlook. The rear facing windows, although overlooking back gardens it is acknowledged that a mutual degree of overlooking already exists due to rear facing upper floor windows on other properties.

Highways/Parking

- The site has a public transport accessibility level (PTAL) of 1b, so would be required to meet the car parking requirements of the London Plan which currently a maximum of 2 spaces.
- It is observed that the applicant proposes access to the site on the southern side of Onslow Road. With cars to be parked at 90 degree angles to the road. However, to facilitate this the existing crossover would need to be widened to an extent which is contrary to the maximum crossover width guidance within the Borough's Transport SPD. This will result in a very wide crossover which could have pedestrian and vehicle safety Impact and would be unlikely to get approval from the Borough Engineer. An alternative arrangement should be investigated.
- It is however noted that the site is located within a Controlled Parking Zone (CPZ) 'A2 - Richmond Hill.' Times: Monday to Saturday 8:30am to 6:30pm (Bank and Public holidays free). If the applicant can demonstrate that the site is constrained and the parking is not feasible a car free scheme could be considered subject to the applicant entering into a legal agreement with Council precluding future occupants from obtaining parking permits.
- The proposed plans shows space for cycle parking. 2 x spaces are required for this type of development. This should be covered and secure.
- The refuse storage requirements would be 1 x 240l refuse bin and 2 x 55l boxes for paper and mixed recycling to be stored.
- The applicant will need to justify the displacement of the existing garages. A Transport Statement should be provided in this regard and possibly a parking survey to demonstrate any potential cars parked within the garages by owners who reside within 200m radius of the site can be satisfactorily accommodated in the locality.
- Drawings should be submitted which demonstrates vehicles can enter and exit the site in a forward gear.
- A full Construction Management Plan should be submitted with any future application.

Sustainability

- Local Plan Policy LP22 outlines councils sustainability requirements for new dwellings and change of use.
- Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.

- Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).
- Developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. The proposed development is required to achieve a 35% reduction and this will need to be demonstrated by an Energy Report.
- Should any new plant to service the dwellings be proposed, a noise assessment will be required to accompany the application.

Affordable housing

- Policy LP36 requires contributions to affordable housing from all small sites, further details are set out in the Affordable Housing SPD.
- The contribution would be 5%. A commuted sum calculation should be provided for validation.
- Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing. The developer will be required to underwrite the costs of a Council commissioned economic viability assessment

SUDS

- LP21 requires the use of sustainable drainage systems in all development proposals. Applicants will have to demonstrate a reduction in surface water discharge to greenfield run-off rates wherever feasible. Further guidance is available in the Council's SRFRA. Given the current hardstanding on the site, the scheme presents an opportunity to improving surface water run-off conditions.

Fire Safety

- A fire safety statement is a validation requirement.

Neighbour Consultation

- It is recommended to undertake a neighbour consultation prior to the submission of any planning application.

Summary

- The principle of the proposal can be acceptable.
- The existing garages do not contribute to the conservation area and the demolition of these are not objected to in regard to design. The proposed contemporary dwelling design is considered appropriate in this instance as is the alterations to the stair core of No.19-23 Friars Stile Road.
- There are concerns regarding the proposal appear overbearing and resulting in loss of sunlight to no.1 Onslow Road. At this stage the applicant is advised the Council objects to the application on these grounds.
- The current carparking arrangement is not considered acceptable and alternate arrangements should be investigated.

Without prejudice

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could

alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

In the meanwhile should you have any further concerns or enquiries please do not hesitate in contacting me.

Yours sincerely



Team Manager – South Area

Development Management

London Borough of Richmond Upon Thames