

## Application reference: 23/2824/FUL EAST SHEEN WARD

Date application received	Date made valid	Target report date	8 Week date
18.10.2023	18.10.2023	13.12.2023	13.12.2023

**Site:**

Electric Vehicle Charging Points Adjacent To, 334 - 336 Upper Richmond Road West, East Sheen, London

**Proposal:**

Planning application for the installation of Electric Vehicle Charging Infrastructure adjacent to 334 - 336 Upper Richmond Road, London, SW14 7JR.

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

**APPLICANT NAME**

/  
Palestra House  
197 Blackfriars Road  
London  
SE1 8NJ

**AGENT NAME**

Laura Stritch  
Palestra House  
197 Blackfriars Road  
London  
SE1 8NJ  
United Kingdom

**DC Site Notice:** printed on and posted on and due to expire on

**Consultations:**

**Internal/External:**

**Consultee**

LBRUT Transport  
LBRUT Highways  
14D Urban D

**Expiry Date**

06.11.2023  
06.11.2023  
06.11.2023

**Neighbours:**

Flat 1,459 Upper Richmond Road West,East Sheen,London,SW14 7PR, - 23.10.2023  
Flat 2,1 Grand Parade,East Sheen,London,SW14 7PS, - 23.10.2023  
4 Grand Parade,East Sheen,London,SW14 7PS, - 23.10.2023  
459 Upper Richmond Road West,East Sheen,London,SW14 7PR, - 23.10.2023  
459A Upper Richmond Road West,East Sheen,London,SW14 7PR, - 23.10.2023  
Flat 1,459A Upper Richmond Road West,East Sheen,London,SW14 7PR, - 23.10.2023  
Flat 2,459A Upper Richmond Road West,East Sheen,London,SW14 7PR, - 23.10.2023  
3 Grand Parade,East Sheen,London,SW14 7PS, - 23.10.2023  
1 Grand Parade,East Sheen,London,SW14 7PS, - 23.10.2023  
Flat 2,459 Upper Richmond Road West,East Sheen,London,SW14 7PR, - 23.10.2023  
332 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
First Floor Flat,334 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
Ground Floor,334 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
338 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
336 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
Ground Floor Flat,336 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
Top Flat,334 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
Flat 1,336 Upper Richmond Road West,East Sheen,London,SW14 7JR, - 23.10.2023  
56 Gilpin Avenue,East Sheen,London,SW14 8QY -

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

Development Management

Status: PCO

Date:

Application:23/2824/FUL

Planning application for the installation of Electric Vehicle Charging Infrastructure adjacent to 334 - 336 Upper Richmond Road, London, SW14 7JR.

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<b>Application Number</b>	<b>23/2824/FUL</b>
<b>Address</b>	Electric Vehicle Charging Points Adjacent To 334 - 336 Upper Richmond Road West East Sheen London
<b>Proposal</b>	Planning application for the installation of Electric Vehicle Charging Infrastructure adjacent to 334 - 336 Upper Richmond Road, London, SW14 7JR.
<b>Contact Officer</b>	<b>Jeremy Maclsaac</b>

## 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 has 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 complies with relevant Local Plan Policies, the planning officer is taking into account 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 subject site is directly south of 334 – 336 Upper Richmond Road West East Sheen Richmond. This is a busy high street and nos. 334 and 336 are Buildings of Townscape Merit and part of Upper Richmond Road West East Sheen Village Character Area.

The application site is designated as:

- Article 4 Direction Basements
- CIL – East Sheen
- Village Character Area – Upper Richmond Road West (East Sheen) – Character A
- Area Susceptible to Groundwater Flood
- Critical Drainage Area
- Increased Potential for Elevated Groundwater
- Risk of Flooding from Surface Water

## 3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

Planning application for the installation of Electric Vehicle Charging Infrastructure adjacent to 334 - 336 Upper Richmond Road, London, SW14 7JR.

The comprehensive list of planning history can be found above however the most relevant planning history is as follows:

There is no relevant planning history associated with the site.

## 4. CONSULTATIONS CARRIED OUT

The list of neighbours notified of this application are listed above.

1 letter of observation has been received and the comments can be summarised as follows:

- Loss of existing parking is not a disbenefit to the retailers, residents and others in the area.
- Lack of response from neighbours is not considered support.

## 5. MAIN POLICIES RELEVANT TO THE DECISION

### NPPF (2023)

The key chapters applying to the site are:

- 4. Decision-making
- 9. Promoting sustainable transport
- 12. Achieving well-designed places
- 16. Conserving and enhancing the historic environment

These policies can be found at:

<https://www.gov.uk/guidance/national-planning-policy-framework>

### London Plan (2021)

The main policies applying to the site are:

- SI1 Improving air quality
- T6 Car parking
- D5 Inclusive Design
- D12 Fire Safety
- HC1 Heritage conservation and growth

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	Compliance	
Local Character and Design Quality	LP1	Yes	No
Impact on Non-Designated Heritage Assets	LP4	Yes	No
Impact on Amenity and Living Conditions	LP8	Yes	No
Sustainable Travel Choices	LP44	Yes	No
Parking Standards and Servicing	LP45	Yes	No

These policies can be found at

[https://www.richmond.gov.uk/media/15935/adopted\\_local\\_plan\\_interim.pdf](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 will continue to be used; in addition, no weight will be given to Policy 39 in relation to the 20% biodiversity net gain requirement; all other aspects and requirements of these policies will apply.

Overall, the weight afforded to each policy at this stage will differ depending on the nature of representations received to that policy. Where relevant to the application under consideration, this is addressed in more detail in the assessment below.

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Issue	Publication Local Plan Policy	Compliance	
Local character and design quality	28	Yes	No
Non-designated heritage assets	30	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
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These policies can be found at

[https://www.richmond.gov.uk/media/16749/hpn\\_plan\\_2018\\_to\\_2033\\_january\\_2019.pdf](https://www.richmond.gov.uk/media/16749/hpn_plan_2018_to_2033_january_2019.pdf)

### Supplementary Planning Documents

Buildings of Townscape Merit

Transport

These policies can be found at:

[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/supplementary\\_planning\\_documents\\_and\\_guidance](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance)

### Other

London 2030 Electric Vehicle Infrastructure Strategy

London Electric Vehicle Infrastructure Delivery Plan

Richmond Air Quality Action Plan 2020-2025

Richmond Electric Vehicle Recharging Strategy (2016-2026)

Mayors Transport Strategy

## 6. EXPLANATION OF OFFICER RECOMMENDATION

The key issues for consideration are:

- i Principle of development
- I Design and heritage assets
- ii Neighbour Amenity
- iii Transport

### Issue i – Principle

At the heart of the NPPF is the presumption in favour of sustainable development. Chapter 2 Achieving Sustainable Development sets out that the environmental objectives of sustainability are to minimise pollution and to adapt to climate change including moving to a low carbon economy. Chapter 9 Promoting Sustainable Transport endeavours to offer a genuine choice of transport modes, reduce emissions, improve air quality and in turn, public health. In regard to electric vehicles in particular, it states that development in this regard should be designed to enable charging of low emissions vehicles in safe, accessible and convenient locations. The proposal seeks to provide electric charging points affecting parking bays which will encourage the use of electric and hybrid vehicles. These types of vehicle produce fewer emissions which results in an improvement in air quality than in comparison with conventional petrol or diesel vehicles. The provision of charging points also contributes to available transport options through increasing the viability of electric vehicle use. Upper Richmond Road West is considered to be a convenient location in that it is close to shops and facilities. As such, the proposal is considered to be NPPF compliant.

The London Plan contains policy which seeks to minimise carbon dioxide emissions and policy which covers the strategic approach in regard to switching to more sustainable modes of transport and promoting a greater use of low carbon technology. In particular, these policies highlight that ground-based transport is a major source of carbon emissions and that promoting the use of electric vehicles is an important factor in tackling climate change. As such, the proposal to provide electric charging points will encourage the use of sustainable transport via a low carbon mode and so will assist in reducing ground-based transport emissions. Therefore, the proposal is in accordance with the London Plan.

In June 2019, the London Electric Vehicle Infrastructure Delivery Plan was published. This evidences a need for the expansion of public charging points as the lack of infrastructure is currently the most immediate barrier to electric vehicle use at city level. This document also sets

out there is an increase in the number of registered hybrid vehicles with a forecast growth of between 145,000 to 335,00 by 2025 in London as a whole. It is stated that consideration should also be given to suitable locations of this infrastructure in preventing street clutter causing car vs pedestrian conflict. The proposal seeking to form electric charging points will help to overcome the issue of a lack of infrastructure and will provide for additional electric and hybrid vehicle demand forecast.

When considering the proposal at the level of the London Borough of Richmond Upon Thames, it is also noted that Richmond declared a climate emergency in July 2019 and as such, there is a presumption in favour of developments which seek to address this concern. The Richmond Air Quality Action Plan 2019-2024 supports the continuation of rolling out electrical vehicle charging points throughout the borough. The submitted planning statement also puts forward that the Richmond Air Quality Management Plan gives an estimate of 7,362 more electric vehicles by 2024 which is considered to be a reasonable assumption given that this is a mid-range estimate of the currently available data. This demonstrates a need at borough level. The Richmond Electric Vehicle Recharging Strategy (2016-2026) also highlights an increase number of requests by Richmond residents for electric vehicle charging points near their homes and states that Richmond has the largest potential uptake rates according to TFL analysis. This document also estimates that up to 45% of electric vehicles may require on street parking demonstrating a need for on-street parking to serve those who do not benefit from on-plot/off-street parking with private charge point. As such, the proposal is considered to be providing for an identified need within the borough for on-street charging facilities.

The Air Quality SPD which was adopted in June 2020 designates some Air Quality Focus Areas within the borough, one of which includes Richmond Town Centre and extends across to East Twickenham. The SPD sets out that all development proposed in or adjacent to these areas must play their part in ensuring that air quality in these areas does not worsen and must contribute towards an overall improvement in air quality. The application site is directly within this Air Quality Focus Area, supporting policy objectives in that it offers a mode of transport which does not emit pollutants.

Within the Richmond Local Plan, Policy LP45 covers Parking Standards and Servicing and Policy LP44 which promotes sustainable transport solutions which minimise the impacts of development relating to air pollution and carbon dioxide emissions. The proposal seeking to provide electric vehicle charging points is considered to be in accordance with these policies.

Therefore, the principle of development is considered to have been established in accordance with the above relevant policies and guidance.

#### **Issue ii – Design and impact on heritage assets**

*Policy LP1 of the Local Plan 2018 seeks to maintain and, where possible, enhance the high architectural and urban design quality which contributes to the character and heritage of the area. Proposals should demonstrate an understanding of the site and its context when considering the design including layout, siting and access and the compatibility of the works to the neighbouring uses.*

*Policy LP4 states that development shall preserve the significance, character and setting of non-designated heritage assets.*

The East Twickenham Village Planning Guidance, in particular Character Area 1 in which the application site is located does not highlight street clutter to be an issue.

The closest piece of street furniture to the application site comprise a lamppost and camera. The proposed feeder pillar and electric charge point is proposed to be sited between these existing features and so do not result in excessive street clutter.

There is an example of an electric vehicle charging point on Upper Richmond Road West to the front of a parade of shops slightly further to the west.

In addition to being sited away from areas of existing street clutter, the proposed feeder pillar and charging point are of modest scale. Their height is limited. Both the feeder pillar and charging point are proposed to be dark in colour and so will not draw attention in the streetscene.

The proposed location is to the front of a terrace of distinctive BTM houses, which has a relatively clear footway, in contrast to the adjoining shopping parades. The group of BTMs are noted for their 'consistent character' in the Village Guidance for East Sheen Character Area 1. The benefits provided by the proposed electric vehicle charging port will outweigh the slight detraction from the consistency of these BTMs along Upper Richmond Road West. The proposed electric vehicle charging port will be located 1.8m from the boundary of the nearest BTM (334).

Further, policy LP22 supports the use of renewable energy on existing properties, as such in view of the sustainability benefits of the proposal, which weighs significant in favour of the proposal when assessed as part of the overall planning balance, the electric vehicle charger and associated works are considered to be acceptable.

The proposed scheme is considered acceptable in terms of design/visual amenity. The proposal is not considered to detrimentally impact the character of the wider area or setting of adjacent buildings of townscape merit and is in line with the aims and objectives of policies LP1, LP4 & LP22 of the Local Plan (2018), Policies 28 and 30 of the Richmond Publication Local Plan and relevant supplementary planning documents.

### **Issue iii – Neighbour Amenity**

*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.*

Given scale, siting and nature of the proposals, the works are not considered to result in material impact on the residential amenity of neighbouring or surrounding dwellings.

The proposed scheme is considered acceptable in terms of neighbour amenity. The proposal is not considered to detrimentally impact the amenities of any neighbouring occupiers and therefore, is in line with policy LP8 of the Local Plan (2018), Policy 46 of the Richmond Publication Local Plan and relevant Supplementary Planning Documents/Guidance.

### **Issue iv – Transport**

*Policy LP44 of the Local Plan states 'The Council will work to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment.'*

*Policy LP45 of the Local Plan states 'The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and the local environment, and ensuring making the best use of the land.'*

#### *Transport SPD*

##### *10. Electric vehicle charging*

*10.1 Richmond is predicated to have a rapid take up of electric vehicles, requiring a commensurate supply of charging infrastructure. Development should make provision for 100% active electric vehicle parking. This does not mean that every parking space needs to be equipped with a charging point, as one fast or rapid charging point may cater for many vehicles. Developers should demonstrate that the development would be able to operate satisfactorily in the future expectation of all vehicles being electrically powered.*

*London Plan policy T6 requires that where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people*

The NPPF states at paragraph 109 that development should only be refused on highways ground if there are severe residual cumulative impacts. planning permission is not required for the reallocation of parking bay to electric vehicles only as this does not constitute development. It is also recognised that the proposal will not result in a loss of parking spaces, although the use of the bays would be restricted to electric vehicles only. The loss of bays which are not restricted by vehicle type does have the potential for short term harm, however this harm is not considered to be severe given its scale in that it only affects 2 bays and due to the associated benefits which in this instance is considered to outweigh the harm.

It is also considered necessary to apply a condition to this application that should the charging points no longer be required, they must be removed to ensure the infrastructure does not have a detrimental impact without the benefits of supporting electric vehicle use.

It is also necessary to ensure that the installation of these electric charging points and infrastructure does not cause conflict with pedestrian users when considering its siting on the footway. There will be a loss of footway because of this proposal, but pedestrians will still have a footway width of approximately 1.3m between the infrastructure proposed and the North border of the footway. While this is less than the 2m suggested by the Manual for Streets, it is sufficient for use by various types of pedestrians including wheelchair and pram users. The feeder pillar and charging points are sufficiently separated that the full width of the footway is available between the charging point to allow for waiting while other users pass by if necessary.

The required visibility for motorists from the Leinster Avenue/Upper Richmond Road West Junction is 2.4 meters x 14 meters in a southerly direction. (Manual for Streets). The proposal does not encroach on the existing visibility envelope.

As a result of the above, the proposed scheme complies with Policies LP44 and LP45 of the Local Plan, Policies 47 and 48 of the Richmond Publication Local Plan and the Transport SPD.

### **Other Matters**

#### **Trees**

There are no street trees in close proximity and the closest trees are of sufficient distance away that they would not be detrimentally impacted by the excavation necessary to install the charging points or the use of the charging points thereafter. As such, no objection is raised to the application in this regard.

#### **Fire Safety**

The applicant has provided a 'Reasonable Exception Statement (RES)' as required under policy D12 of the London Plan (2021).

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.

## **7. 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 not considered liable for the Mayoral or Richmond CIL however this is subject to confirmation by the CIL Administration Team

## **8. RECOMMENDATION**

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

Paragraph 11 of the Framework explains how the presumption in favour of sustainable development applies. For the reasons set out above, this application falls to be determined in accordance with the test under section 38(6) of the 2004 Act, the proposal is in general conformity with the Development Plan overall and there are no material considerations of sufficient weight to justify refusal.

**Grant planning permission with conditions**

#### **Recommendation:**

The determination of this application falls within the scope of Officer delegated powers - YES / NO

**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): JMA Dated: 12.12.2023

**I agree the recommendation:**

This application has been subject to representations. The Head of Development Management / South Area Team Manager has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

South Area Team Manager: .....ND.....

Dated: .....12.12.2023.....