



Application for: Demolition of the existing garages and first floor apartment and erection of a block of 4x flats (2 x 1 bedroom and 2 x 2 bedroom) with hard and soft landscaping and solar panels and rooflights within the roofscape

At: Hunters Lodge, Friars Lane, Richmond, TW9 1NX



PLANNING STATEMENT

PREPARED BY
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1.0 INTRODUCTION

- 1.1 This statement has been prepared in support of a full planning application for the demolition of the existing garages and first floor apartment block known as Hunters Lodge, within the south-west corner of Hunters Court off Friar's Lane in Richmond to provide 4x flats (2 x 1 bedroom and 2 x 2 bedroom) with hard and soft landscaping and solar panels and rooflights within the roofscape.
- 1.2 Following the last refusal of planning permission for a similar scheme, extensive discussions have been held with the planning officers at LBRUT to ensure that this proposal met with their policies, guidelines and standards. Significant work has gone into this proposal to ensure it has met all the reasons for refusal of the previous schemes.
- 1.3 The proposal has addressed the reasons for refusal from the last application in the following ways:
- 1) **Amenity** – the building has been reduced in size and sited further away from the residents of no.1 Hunter's Court to ensure the impact on their amenity is acceptable and would not be overbearing or unneighbourly.
 - 2) **Residential standards** – the habitable rooms would meet the residential space standards and following advice from the LPA, due to the constrained site and inability to provide dormers, a slight reduction in size of the 2 bedroom flats that this can be acceptable. A full layout has been shown to show the flat provides a decent standard of accommodation with both bedrooms exceeding space standards. Sufficient cycle parking and waste storage is to be provided.
 - 3) **Sustainability** – an up-to-date Energy Statement, Sustainable Construction Checklist and GLA Carbon Emissions Reporting Spreadsheet have been submitted with the application. Energy efficiency measures proposed are the installation of a heat pump hot water cylinder into each apartment as well as a total of 22 x 400W photovoltaic panels installed on the southwest orientated rear roof of the building. The residual emissions are 0.923 tonnes, which requires a carbon offset payment of £2,631 (based on the carbon offset payment of £2,850 per tonne).

- 4) **Flooding** – the proposal is supported with a Flood Risk Assessment which development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.
- 5) **Affordable housing** – the decision of whether a financial contribution is required for this proposal will be determined through the application process. A viability assessment has been provided by S106 Management which concludes that the proposal would not be able to justify any payment.
- 6) **Design/heritage** – The design has been amended and reduced in scale to ensure it does not harm the character and appearance of the conservation area and adjacent listed wall as well as the surrounding site.

1.4 The site is located within a residential area in the heart of Richmond, close to The Green. The adjoining wall is Grade II Listed and the site is located within Richmond Green Conservation Area.

1.5 Paragraph 70 of the National Planning Policy Framework (NPPF) 2023 states that:

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.

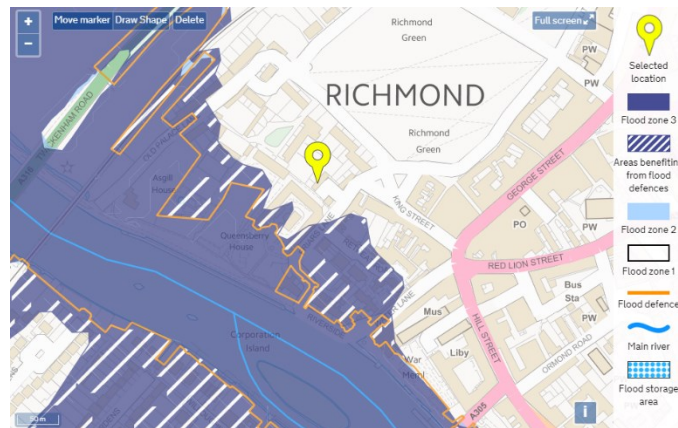
1.6 The statement describes the site and proposal and sets out how the proposal complies with the policies and guidance as set out in the NPPF, the London Plan and the London Borough of Richmond upon Thames Local Plan. We therefore request that planning permission should be granted.

2.0 SITE AND SURROUNDINGS

- 2.1 The site comprises a terrace of garages with residential accommodation at first floor level within a flat roofed building situated to the front of a row of terraced housing known as Hunters Court. The site is off Friar's Lane and is close to The Green in Richmond. The photograph below shows the view of the site taken from Hunter's Court. More photographs are submitted with this application in a separate document.



- 2.2 The site is within the Richmond Green Conservation Area and adjoins a grade II Listed wall. Queensberry House to the south-west of the site and a number of the properties along Friars Lane to the north-east are designated as Buildings of Townscape Merit (BTM). The site is also located within an area of Archaeological Priority and within the Main Centre Buffer Zone of Richmond. The site is not within a flood zone, as shown below from the Environment Agency's map. However, the site is within an area at greater than 50% risk of Groundwater Flooding flood risk.



2.3 The buildings within the immediate vicinity of the site are all of differing styles with no one style which should be replicated. This is confirmed in the Richmond and Richmond Hill Village Planning Guidance from 2016 which states:

“Friars Lane has the most diverse townscape character of those linking the centre to the river. There is a wide mix of building styles and scales. Buildings of note include Queensberry House and The Retreat, where high walls and mature trees give a sense of enclosure”.

3.0 PLANNING HISTORY

- 3.1 On 16th November 2023, planning permission was refused for the demolition of the Hunters Lodge (existing garage and apartment building) and creation of 4 new units with associated terraces and landscaping (ref. 23/1319/FUL) for six reasons: amenity (impact on 1 Hunter's Court), residential space standards (sub-standard living conditions and environment), sustainability (absence of Energy Report), flooding (absence of FRA), affordable housing (absence of a legal agreement to secure an appropriate contribution towards offsite affordable housing) and design/heritage (dominant, unsympathetic and incongruous form of development).
- 3.2 On 9th August 2022, planning permission was refused for demolition of the Hunters Lodge (existing building) and creation of 4 two-bed units with basement (ref. 22/1648/FUL).
- 3.3 On 9th August 2022, planning permission was refused for the demolition of the Hunters Lodge (existing building) and creation of 4 new units (2 x two-bed and 2 x 1-bed). (22/1649/FUL).

Pre-application advice

- 3.4 On 13th December 2023, amended plans were submitted to the planning department for further pre-application advice. The architect had pulled the roadside elevation in by 1m and the Court elevation in by 1m also. The front elevation and rear are the same. It was not been possible to reduce the roof line but the windows facing Hunters Court have been minimised. To ensure the 2 bed flats are 70sqm in size the provision of dormers are required.
- 3.5 On 26th January 2023, a meeting was held between the Council officers and the applicant's team. It was concluded that:
- There should be no connection to the wall. Ensure this is referenced in the DAHS and that the SE should avoid anything to do with the wall.

- Note that the bins and bikes stores do not and will not interfere with the wall – show specifics of the enclosure.
- Archaeological and GLAAS info is ok, will be newly reviewed.
- Traditional design is acceptable. Footprint was issue with dormers, simpler design is preferred. Dormers to be removed. Will affect the Sq M by 2.6 m. but the LPA should accept shortfall in lieu of removing dormers.
- Happy with revised footprint. Subject to loss of dormers, massing improved.
- Review the landscape and mark softer.
- Rooflights - Conservation style.
- Integrated panels preferred.
- Air source heat pumps – Plant noise assessment required and show location.
- Residential amenity – show full screen at FF and show spec to all sides.
- BRE daylight and light report to be submitted.
- Make sure the FRA is specific and updated.

4.0 RELEVANT PLANNING POLICY

- 4.1 The development plan comprises the Richmond upon Thames Local Plan (2018) and the London Plan (2021). The National Planning Policy Framework (NPPF) 2023 is also a material consideration. Relevant policies are set out below:

National Planning Policy Framework (2023)

- 4.2 Paragraph 38 of the National Planning Policy Framework (2021) states that:

“Local planning authorities should approach decisions on proposed development in a positive and creative way ... Decision-makers at every level should seek to approve applications for sustainable development where possible”.

[Emphasis Added]

Housing

- 4.3 Paragraph 61 sets out the overall thrust of the planning policy approach towards housing provision at a national level has been to boost significantly the supply of housing. The Framework gives a clear and concise statement of Government policy on the matter of housing supply, commencing at paragraph 60 which seeks to “boost significantly the supply of homes” and that it is “important that a sufficient amount and variety of land can come forward where it is needed, that the needs of specific housing requirements are addressed”.

- 4.4 Paragraph 61 states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance.

[Emphasis Added]

Heritage assets

- 4.5 Paragraph 196 states that local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

4.6 Paragraph 208 states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

4.7 Paragraph 209 states that “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.

Achieving well-designed and beautiful places

4.8 Paragraph 131 states: The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

4.9 Paragraph 135 states that decisions should ensure that development, inter alia, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; 40 c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

4.10 Paragraph 139 stated that:

“... significant weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”.

[Emphasis Added]

Carbon and Climate Change

- 4.11 Paragraph 152 states that: “The planning system should support the transition to a low carbon future in a changing climate”.

National Design Guide (2019)

- 4.12 The National Design Guide states at Paragraph 51 that well-designed buildings and spaces:

- a. Have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion;
- b. Have a character that suits the context, its history, how we live today and how we are likely to live in the future; and
- c. Are visually attractive, to delight their occupants and other users.

London Plan (2021)

- 4.13 The main London Plan policies applying to the site are:
- Policy GG2 Making the best use of land
 - Policy D4 Delivering good design
 - Policy D6 Housing quality and standards
 - Policy D12 Fire Safety
 - Policy H1 Increasing housing supply
 - Policy H2 Small sites
 - Policy HC1 - Heritage Conservation and Growth

- Policy SI 13 Sustainable Drainage
- Policy T6.1 Residential parking

LBRUT's Local Plan (2018)

4.14 The main Local Plan policies applying to the site are:

- LP1 Local Character and Design Quality
- LP3 Designated Heritage Assets
- LP4 Non-Designated Heritage Assets
- LP7 Archaeology
- LP8 Amenity and Living Conditions
- LP11 Subterranean developments and basements
- LP15 Biodiversity
- LP16 Trees, Woodlands and Landscape
- LP20 Climate Change Adaptation
- LP22 Sustainable Design and Construction
- LP24 Waste Management
- LP34 New Housing
- LP35 Housing Mix and Standards
- LP36 Affordable Housing
- LP44 Sustainable Travel Choices
- LP45 Parking Standards and servicing

LBRUT Supplementary planning documents and guidance:

- Design Quality SPD (February 2006),
- Richmond and Richmond Hill Village Planning Guidance SPD (2016),
- House Extensions and External Alterations SPD (May 2015),
- Residential Development Standards SPD (March 2010),
- Small and Medium Housing Sites SPD (February 2006),
- Richmond Green Conservation Area Statement.
- Transport SPD (June 2020).

Richmond Publication Local Plan (Regulation 19 version)

4.15 The Richmond Publication Version Local Plan (Regulation 19 version) was considered at Full Council on 27th April 2023. 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, was published for consultation on 9 June 2023 which ended on 24th July 2023. Together with the evidence, the emerging Local Plan is now 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. 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, the policies will be addressed in more detail below.

- Place-based Strategy for Richmond and Richmond Hill
- Policy 3: Tackling the climate emergency
- Policy 4: Minimising Greenhouse gas emissions and promoting energy efficiency
- Policy 5: Energy Infrastructure
- Policy 6: Sustainable construction standards
- Policy 8: Flood risk and sustainable drainage
- Policy 19: Managing the impacts of development on local surroundings
- Policy 28: Local character and design quality
- Policy 29: Designated heritage assets
- Policy 33: Archaeology
- Policy 39: Biodiversity and Geodiversity
- Policy 42: Trees, Woodland and Landscape
- Policy 44: Design process
- Policy 46: Amenity and living conditions
- Policy 47: Sustainable travel choices
- Policy 48: Vehicular Parking, Cycle Parking, Servicing and Construction Logistics Management

5.0 PROPOSAL

- 5.1 The application seeks the demolition of the existing building (redundant garages with an apartment above) and the erection of a new bespoke 2 storey building to be subdivided into 2no. 2bedroom flats and 2 no. one bedroom flats. A rear yard would be provided for the ground floor flat (unit 1) with rear terraces provided for the upper floor flats (where a terrace currently exists). The roof would be hipped and include accommodation with the provision of rooflights to provide adequate light and ventilation into the bedrooms and bathrooms. Solar panels would also be installed onto the rear roofslope.
- 5.2 An area for bin storage would be provided against the southern wall with bike storage provided behind the existing car parking spaces (to the front of houses 1 and 2 Hunter's Court). Further bin storage would be located to the side of the building on the south-west of the site behind the high boundary wall.
- 5.3 Materials would comprise of traditional brick to match the neighbouring housing and slate roof tiles. All windows and doors would be made from hard timber. Photovoltaics would be installed onto the rear roof slope.
- 5.4 The landscaping would comprise the following: The 4 existing trees on the grassed area opposite the building would be retained the area improved with enhanced planting and new edging. Neutral beige sawn sandstone paving to be provided by the front of the site. Parking and drive areas to be neutral grey permeable paving with associated edging kerb. The existing paving across frontage of Hunters Court to be retained with repairs /connections to new hard landscaping. A granite set rumble strip detail to be added to the entrance of the site. A new planted strip to be added to front the proposed building (details to be provided via a condition to the permission). New sandstone footpaths connecting pavement, new building, and amenity spaces. 3no car parking spaces with adjacent planted space to landscape design spec. Accessible bin and recycling space. Accessible bin and recycling space covered with sedum roof and secure enclosure for 7no bicycles.

6.0 PLANNING CONSIDERATIONS

- 6.1 The main planning issues relate to the principle of redeveloping this site for housing, housing need, the impact on the character and appearance of the Richmond Conservation Area, adjoining listed wall, archaeology, neighbouring locally listed buildings, the standard of accommodation provided, impact on neighbouring properties, parking, trees, flooding, sustainability and impact on neighbouring properties.

Principle

- 6.2 The pre-application response received on 26th February 2024 confirmed that this proposal is much improved and positively responds to the comments made in January 2024 by the Team Leader for Richmond. As with the previous applications, there is no objection in principle to demolishing the garages and redeveloping the area to provide residential accommodation, subject to a satisfactory structural report to ensure the stability of the adjoining Listed wall can be maintained and adequate justification in regard to the loss of garages. The proposal will deliver housing and therefore supports the Government's objective of significantly boosting the supply of homes. Paragraph 70 of the National Planning Policy Framework (NPPF) details that small sites such as this, can make an important contribution to meeting the housing requirements of an area.
- 6.3 Policy H2 of the London Plan 2021 states that boroughs should pro-actively support well-designed new homes on small sites through planning decisions in order to significantly increase the contribution of small sites to meeting London's housing needs as well as to diversify the sources, locations, type and mix of housing supply. The policy also notes that boroughs should recognise that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites.
- 6.4 The London Plan 2021 supports incremental intensification within PTALs 3-6 and that can include infill development and redevelopment of residential garages where this results in net additional housing provision (para 4.2.4). This site falls within a PTAL of 5 and therefore complies with this London-wide policy and expectation to better use small wind-fall sites in sustainable locations. The supporting text to London Plan policy H2

also specifically states that incremental intensification can take a number of forms such as “redevelopment or extension of existing buildings, including ... residential garages, where this results in net additional housing provision.”

- 6.5 The proposed new dwellings would be slightly larger than the existing building but the redevelopment of this section of land is in the spirit of the London Plan policy direction. As such, it is considered that the London Plan supports incremental intensification in the form of infill development in this location, given that it would result in net additional housing provision.
- 6.6 The existing four garages are owned by the applicant, Richmond Green Developments but they are too small to function as garages for vehicular parking being less than 3m x 6m in size internally. The garage doors are only 2065mm wide and the garages have an internal width of 2550mm with a depth of 5555mm. Therefore, they are substandard in size for modern day cars and therefore their loss should not be objected to. They are currently used for storage purposes.
- 6.7 The supporting Structural Engineering Report in relation to the adjacent grade II listed wall has been prepared in order to provide evidence that the proposal can be constructed without undermining the structural stability of the adjoining Grade II Listed Wall. The report concludes that:
- “It is of our opinion that, providing the works are carried out by a skilled contractor experienced in such operations, the proposals can be built safely and without significant structural impact on the existing wall in question. The proposed development can be achieved using standard construction techniques and materials, and can be constructed in a controlled and predetermined sequence”.*
- 6.8 The ownership of the garages has been confirmed within this application (see the Certificates on the application form).

Design/Visual Amenity and impact on Richmond Green Conservation Area

- 6.9 As demonstrated with the street scene elevations, the proposed building would not be significantly larger than the existing block nor overwhelm the adjoining houses in Hunter's Court. Although the other buildings which front the road are significantly taller, this proposed building would remain subservient to the houses in Hunters Court and thus would appear acceptable in the street scene. In fact, the addition of the roof would improve the appearance of the building as the flat roofed existing building is very much of its 1960s era. Thus, the proposal would improve the character and appearance of the character and appearance of the Richmond Green Conservation Area and would not harm the setting of the listed wall.
- 6.10 A full archaeological assessment is submitted with this application and the applicant is aware that the application will need to be referred to GLAAS who may impose conditions including a watching brief during the works.
- 6.11 Although the building line of the new block of flats would extend forward into the site, the pre-application response confirmed that there would be no harm from the fact this would obscure some of the view of the houses to the rear. The building would be 1.9m further forward than the existing building and 2.5m closer to the front boundary wall. However, this is essential to ensure the viability of the scheme. The pre-app accepts that the proposal could be closer to the front boundary wall as long as a gap is maintained between the side wall to ensure people can walk along this space. This is achieved with access to bins along this space. The enlargement of the building would not be so harmful to the character of the streetscene or upon heritage assets to warrant refusal. Further, the building would be 1m further closer to Hunter's Court. However, again this would not be discernible within the context of the existing building. The new roof would be hipped and thus reduce any visual impact.
- 6.12 The brick finish to match the existing housing is an appropriate design response. Use of traditional materials and white painted timber framed windows reflect the predominant character of the locality. The previous pre-application response confirmed that there is "no objection to the revised traditional external design and proportions which will be closer to that of the existing houses on the site and will therefore be more visually unified. The updated design will also fit positively into the existing townscape".

- 6.13 Space has been retained to the rear of the new building providing an opportunity to reveal the significance of the listed wall. Hence, listed building consent is not required in this instance.
- 6.14 The application has been supported with a very thorough Heritage Statement from Heritage Collective. Overall, the proposal complies with policies LP1 and LP3 of the Local Plan.

Residential Amenity

- 6.15 The application site is adjoined by Nos. 1 – 4 Hunters Court to the north west and apartments within Queensbury House to the south west. To the north east of the site are Nos. 1 & 2 Elystan Court. To the south east are properties fronting Friars Lane.
- 6.16 The proposed replacement building would have a hipped roof. This application includes a BRE assessment to ensure that the properties within Queensbury House and Hunter's Court as well as the immediate properties fronting Friars Lane are not impacted from the additional built form at roof level.
- 6.17 The existing building is two storey with a rear terrace (as shown in the photographs) and therefore the only change for the neighbours in terms of bulk and massing is the addition of the hipped roof. This is set back from the sides of the building to ensure it appears subservient and would not dominate over the neighbouring properties both in Hunter's Court or Queensbury House. Therefore, the outlook would be similar to that at present. The outlook at first floor is very similar to the current situation for the first floor flat, with a view of the boundary wall but the distance is significant enough to ensure there is adequate outlook.
- 6.18 There is currently a window at first floor level which overlooks no.1 Hunter's Court and the only window at first floor level on the proposed building would facilitate a stairwell (non-habitable). However, a condition could be attached to ensure this is obscure glazed and non-openable below 1.7m to ensure there is no loss of privacy.
- 6.19 The proposal would comply with Local Plan Policy LP8 which requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. This includes ensuring adequate light is achieved, preserving privacy and ensuring proposals are not visually intrusive.

Housing Mix and Standards

- 6.20 Policy LP35 of the Local Plan details that *‘Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location’.*
- 6.21 The site falls into the main centre buffer of Richmond, and given it is located in a highly sustainable location, in close proximity to transport links and services, a higher proportion of smaller units would be more appropriate. The proposal provides 4 small units which complies with this policy.
- 6.22 The proposed units would also be required to comply with the Nationally Described Space Standard. This is achieved for the one bedroom flats but the two bedroom flats are 5sqm short of the standards. However, due to the constrained site and inability to provide dormers the LPA has verbally stated that this can be acceptable as a full layout has been shown to show the flat provides a decent standard of accommodation with both bedrooms exceeding space standards. The supporting Residential Space Standards provides more detail. In this town centre location in walking distance to The Green, the riverside and Old Deer Park it is not essential to provide a significant amount of outdoor amenity space for each residential unit. This was confirmed in an email on 24th October 2022 from Wendy Wong Chang (who we know has now left the Council but was the senior officer at the time of the pre-app). This was also confirmed at the recent pre-application meetings

Affordable Housing

- 6.23 Policy LP36 (Affordable housing) details that the Council expects a contribution towards affordable housing on all housing sites. A separate affordable housing statement has been prepared that will address the affordable housing contribution.

Highways and Parking

- 6.24 The site has a Public Transport Accessibility Level of 5 which means access to public transport is very good.

- 6.25 The application is accompanied with details of how the parking spaces are and will be allocated within the site to ensure no overspill onto surrounding roads or overprovision. The supporting Transport Statement provides further clarification on this issue. Parking is currently ad hoc within the private space fronting the buildings in Hunter's Court.
- 6.26 The proposal is as car-free with the on-site parking only catering for the occupants at 1-4 Hunters Court.
- 6.27 The site is located within Controlled Parking Zone A and the applicant accepts that he will need to enter into a S106 unilateral undertaking to restrict eligibility of all future occupants from applying for residents parking permits for the area as well as apply for season tickets to Council run car parks in mitigation.
- 6.28 Secure and sheltered cycle parking would be provided in accordance with standards set out in the current London Plan. Details of refuse store/management are shown and accords with requirements set out in the Refuse and Recycling Standards SPD. Further details can be conditioned to a planning permission.
- 6.29 The application is accompanied by a surface water drainage strategy which demonstrates that any increased surface water run-off volumes and rates can be accommodated on the site and meets local guidance.
- 6.30 A detailed Construction Traffic Management Plan is submitted, demonstrating how the works are to be carried out, including but not limited to: The number and type of vehicles that will be required, routing, methods of spoil removal and concrete supply, protection for other highway users and vulnerable pedestrians, the position of vehicles, skips, etc.

Flooding

- 6.31 LP21 requires the use of sustainable drainage systems in all development proposals. A Flood Risk Assessment and SUDS Strategy are submitted with this application. This demonstrates a reduction in surface water discharge to greenfield run-off rates. Given the current hardstanding on the site, the scheme presents an opportunity to improving surface water run-off conditions. The conclusions of the FRA are:

The scheme will be flood future-proofed for the lifetime of the scheme. The scheme:

- Reduces impermeable areas overall

- Incorporates formal SUDS storage of the highest form feasible at the constrained site
- o Includes sedum / green roof areas: Source Control and storage
- o Includes rain garden planters: Source Control and storage
- o Includes a rainwater butt (reducing potable water usage)
- o Includes permeable paving with integrated storage: Source Control and storage

Throughflow Screening:

Site is not within the Throughflow Zone. No further calculations are required.

- The scheme includes full flood resilience
- No novel or complex engineering requirements

The scheme will result in lifetime flood future-proofed dwellings.

Based on the likely flooding risk, it is considered that the proposed development can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere and is therefore appropriate development in accordance with the NPPF/PPG.

Trees, landscaping and biodiversity

- 6.32 The application site is located within the Richmond Green Conservation Area and there are a number of trees within the site which are covered by statutory protection. In addition, tree T1 (Holly), T2 (Bay) and T5 (Conifer) are subject to statutory protection via a Tree Preservation Order (TPO), affording them singular protected status.
- 6.33 An Arboricultural Method Statement with tree protection plan has been submitted. This provides detailed documentation relating to tree protection measures and the impact of both direct and indirect construction activities on nearby trees, during the preparation, demolition, construction, and conclusion phases of the proposal.
- 6.34 Further, a landscape plan is provided which shows the careful consideration which has been given to the types of materials to be used and the improvement to the overall hardstanding to this area. The proposal is considered to comply with policy LP16 of the Local Plan.

6.35 A Preliminary Ecological Appraisal has been submitted which concludes:

- The proposed development incorporates a range of habitat enhancements such as native tree, shrub and hedgerow planting;
- The installation of bat boxes on the new building (or retained mature trees around the site boundaries) to provide additional roosting habitat for bats e.g. 2F Schwegler Bat Box (trees); 1FF Schwegler Bat Box (trees); or Vivara Pro Woodstone Bat Box (buildings or trees). Or a similar alternative brand – This element is to be confirmed through conditions.
- Gaps could be incorporated into new boundaries to allow the passage of hedgehogs through the site. The provision of hedgehog houses or brash piles along sheltered areas on the site boundaries could provide further opportunities for shelter;
- Planting of species of plants that encourage greater range of insects and butterflies across the site.

6.36 In conclusion, this scheme represents a great enhancement of the outdoor spaces and an opportunity to provide for biodiversity net gain across the site to comply with policy LP15 of the Local Plan.

Sustainability

6.37 Policy LP22 requires developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change.

6.38 The application includes a completed Sustainable Construction Checklist and an Energy Statement which demonstrates compliance with the maximum water consumption requirements and that the development can achieve the required 35% reduction in carbon emissions. It is proposed to install heat pump hot water cylinders into each apartment. In addition, the Roof Plan & Elevation demonstrates a total of 22 photovoltaic panels could be installed without detrimentally impacting on the aesthetics of the development (the output of the panels is assumed to be 400W).

Water Efficiency

- 6.39 The Council has adopted the national Building Regulations ‘higher standard’ for water consumption of 110 litres per person per day (including an allowance of five litres or less per person per day for external water consumption). All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target.
- 6.40 A National Water Standards Statement demonstrates water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) will need to be submitted as part of any future application.

Archaeology

- 6.41 Policy LP7 seeks to protect, enhance, and promote its archaeological heritage, both above and below ground. The application site is located within an area of Archaeological Priority and proposes a basement which will involve significant excavation.
- 6.42 A desk-based assessment and an archaeological field evaluation is submitted with this application which concludes that:

“in terms of above ground archaeology, the existing building abuts the Grade II listed south-west boundary wall and does not appear to be tied into it. A conservation methodology statement will be prepared prior to the development of this proposal to detail the approach to the careful dismantling of the existing building where it abuts the listed wall. A recording exercise of this section of the boundary wall may also be required, although it is noteworthy that the existing wall in this location appears to date from the later 19th century with later repairs and additions – there does not appear to be any extant Tudor brickwork.

Given the archaeological potential, limited past impacts and high archaeological interest of the subject site, the proposed excavation of a basement in this location is likely to have an adverse impact on any buried archaeology of potentially national or regional significance. In consultation with GLAAS advisors Mark Stevenson and Joanna Taylor, who have reviewed this Archaeological Desk-Based Assessment, additional archaeological evaluation will be required prior to the determination of a full planning

application (ref. Appendix 2). GLAAS concluded that the proposals “pose a significant risk to important above and below ground archaeology”.

- 6.43 The previous application accepted that a two-stage archaeological condition would provide an acceptable safeguard. The applicant accepts that a condition would comprise of an evaluation to clarify the nature and extent of surviving remains, followed by, if necessary, a full investigation. The applicant also accepts that a condition for a foundation design and construction method would be placed on the permission. Both conditions would be required in order to safeguard the archaeological interest on the site, and also to safeguard the adjacent listed wall. The proposal, would therefore, comply with Policy LP7.

Fire Safety

- 6.44 A Fire Safety Strategy Statement has been included as part of the application package of details. The applicant accepts that alterations to existing buildings should comply with the Building Regulations and that a condition can be included to ensure this is adhered to on an ongoing basis. Overall, the scheme is consistent with Policy D12 of the London Plan.

7.0 CONCLUSIONS

7.1 This application has been submitted following extensive input and advice from the planning team at LBRUT. The reasons for refusal of the last application have been addressed in the following ways:

1. Reduction in size of the building to ensure it is located further away from Hunter's Court and the front of the site by the wall. This ensures it is not a dominant, unsympathetic and incongruous form of development and would not harm the character and appearance of the conservation area and adjacent listed wall as well as the surrounding site.
2. The width and siting have been reduced to ensure that the building would not be an overbearing and visually intrusive form of development to the detriment of the residential amenity of nearby occupants, in particular, the occupants at 1 Hunters Court. A Sunlight/Daylight assessment has been submitted to demonstrate that there would be no harm to existing or future residents.
3. The scheme broadly accords with the residential space standards, will provide sufficient cycle parking and waste storage, and with an improved layout there is no harmful outlook from habitable rooms, the scheme represents an acceptable scheme which does not cause an over-intensification and over-development of the site.
4. An Energy Statement and Flood Risk Assessment have been provided to ensure the proposal complies with policies LP20, LP21 and LP22 of the Local Plan.
5. A review of the affordable housing contribution would occur as part of this application process and if a legal agreement is required then this will be negotiated with the planning authority.

7.2 Section 38(6) of the Planning and Compulsory Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. This approach is supported by the National Planning Policy Framework (NPPF) which details a presumption in favour of sustainable development which means approving development proposals that accord with an up-to-date development plan without delay.

- 7.3 A key requirement by the Government is to “boost significantly the supply of housing”. This scheme contributes to that aim and proposes four new dwellings in accordance with Government and Council policy to facilitate housing growth by providing quality homes throughout the Borough. The site is in a sustainable location close to all the amenities in Richmond town centre.
- 7.4 The National Planning Policy Framework (NPPF) states that the social objective to achieving sustainable development is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places. It is sustainable development of good design that will contribute positively to ensuring these new dwellings will provide energy efficient homes for local residents.
- 7.5 The NPPF states that “significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”. This proposal is wholly in keeping with this national requirement.
- 7.6 Paragraph 135 of the NPPF states that development should be “visually attractive as a result of good architecture and layout and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change”. Paragraph 203 also ensures that development sustains and enhances the significance of heritage assets. This statement has demonstrated that the proposal would not result in substantial harm to the character and appearance of the Richmond Green Conservation Area, listed buildings nor neighbouring properties.
- 7.7 The 2021 adopted London Plan has added a housing target from small sites for Richmond of 2,340 and also puts an emphasis on pro-actively supporting well-designed new homes on small sites in order to significantly increase the contribution of small sites to meeting London’s housing needs. This site is one such small site which is in a sustainable location, with good public transport links and close to amenities and services.

- 7.8 There would be no harm to the character and appearance of the Richmond Green Conservation Area nor the adjoining listed wall. Furthermore, there would be no harmful impact on the amenity of neighbouring residents and there are no highway safety implications or harm to nearby trees. Conditions could be attached to a permission to ensure that any archaeological features are preserved and not harmed during demolition and construction.
- 7.9 For the reasons given above, the proposal is considered to comply with the aims and objectives of the NPPF (2021), the London Plan (2021) and the London Borough of Richmond upon Thames Local Plan (2018).
- 7.10 Overall, it is considered to be fully policy compliant and planning permission should be duly granted.