



Application reference: 24/0690/FUL
TWICKENHAM RIVERSIDE WARD

Date application received	Date made valid	Target report date	8 Week date
15.03.2024	28.03.2024	23.05.2024	23.05.2024

Site:

193A Richmond Road, Twickenham, TW1 2NJ,

Proposal:

Removal of 7x existing windows to the front elevation, and 6x windows to the rear elevation, and replacement with energy efficient equivalents of traditional appearance - timber windows to the front elevation, PVCu windows to the rear elevation

APPLICANT NAME

Mr Roger Cole
 15 Crane Mews
 32 Gould Road
 Twickenham
 TW2 6RS
 UK

AGENT NAME

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DC Site Notice: printed on 28.03.2024 and posted on 05.04.2024 and due to expire on 26.04.2024

Consultations:

Internal/External:

Consultee

14D Urban D

Expiry Date

11.04.2024

Neighbours:

- 193B Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- Flat 3, 193A Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- Flat 1, 193A Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- Flat 2, 193A Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 193C Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- Flat 3, 193 Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- Flat 1, 193 Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- Flat 2, 193 Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 195 Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 193 Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 191D Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 191A Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- Flat C, 191 Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 191B Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 191 Richmond Road, Twickenham, TW1 2NJ, - 28.03.2024
- 1 Montpelier Row, Twickenham, TW1 2NQ, - 28.03.2024

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

Development Management

Status: GTD

Application: 47/2819

Date:24/11/1951 The use of the premises for upholstery and light bodywork repairs to cars.

Development Management

Status: GTD Application:11/1031/FUL
Date:18/05/2011 Change of windows to front and rear of property.

Development Management

Status: REF Application:24/0063/FUL
Date:08/03/2024 Removal of 7 x existing windows to the front elevation, and 6 x windows to the rear elevation, and replacement with energy efficient equivalents of traditional appearance.

Development Management

Status: PDE Application:24/0690/FUL
Date: Removal of 7x existing windows to the front elevation, and 6x windows to the rear elevation, and replacement with energy efficient equivalents of traditional appearance - timber windows to the front elevation, PVCu windows to the rear elevation

Building Control

Deposit Date: 13.01.2011 Installed a Gas Boiler
Reference: 11/FEN02606/GASAFE

Building Control

Deposit Date: 06.02.2016 Install a gas-fired boiler
Reference: 16/FEN00868/GASAFE

Application Number	24/0690/FUL
Address	193A Richmond Road Twickenham TW1 2NJ
Proposal	Removal of 7x existing windows to the front elevation, and 6x windows to the rear elevation, and replacement with energy efficient equivalents of traditional appearance - timber windows to the front elevation, PVCu windows to the rear elevation
Contact Officer	Jeremy Maclsaac

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 and 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

193 Richmond Road is an early 20th century shop unit with accommodation above within the Twickenham Riverside Conservation Area. It is two storeys (plus attic accommodation) in red brick under a slate roof. To the ground floor is a modern shopfront with the corbels and pilasters forming the only surviving historic features. 193A refers to the first and second floor flats.

The application site is designated as:

- Article 4 Direction – Basements
- CA8 Twickenham Riverside
- Area Susceptible to Groundwater Flood
- Critical Drainage Area
- Risk of Flooding from Surface Water Depth 1 in 1000 chance
- Risk of Flooding from Surface Water Extent 1 in 1000 chance
- Throughflow Catchment Area

3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

The development comprises removal of 7 x existing windows to the front elevation, and 6 x windows to the rear elevation, and replacement with energy efficient equivalents of traditional appearance.

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

24/0063/FUL – Refused Permission

Removal of 7 x existing windows to the front elevation, and 6 x windows to the rear elevation, and replacement with energy efficient equivalents of traditional appearance.

14/0256/FUL – replacement windows to front and rear (Flat 3). **Granted** proposing UPVC windows.

11/1031/FUL – Granted Permission

Change of windows to front and rear of property.

Amendment from the previous application (below) was to propose timber.

11/0325/FUL – Change of windows to front and rear of property. **Refused** for the following reason:

- *The proposed use of uPVC replacement windows, by reason of their material and design, would represent an unsustainable, unsympathetic and visually obtrusive form of development, detrimental to the appearance and character of the building and conservation area in general. It would thereby be contrary to policies BLT 2 and 11 of the emerging Unitary Development Plan - First Review and policies DM HD 3 and DM DC 1 of the Development Management Plan (public version), PPS5, and Supplementary Planning Guidance 'Design guidelines for house extensions and external alterations'.*

4. CONSULTATIONS CARRIED OUT

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

No letters of representation were received.

5. MAIN POLICIES RELEVANT TO THE DECISION

NPPF (2023)

The key chapters applying to the site are:

- 4. Decision-making
- 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:

- D4 Delivering good 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	Ne
Impact on Designated Heritage Assets	LP3	Yes	Ne
Impact on Amenity and Living Conditions	LP8	Yes	Ne
Impact on Flood Risk and Sustainable Drainage	LP21	Yes	Ne

These policies can be found at

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

Richmond Publication Local Plan (Regulation 19 version)

The Richmond Publication Version Local Plan (Regulation 19 version) was published on 9 June 2023 for public consultation which ended on 24 July 2023.

The Publication Version Local Plan, together with all the representations received during the representation period, the plan and its supporting documents were submitted to the Secretary of State

for examination on 19 January 2024. The submission documents do not form part of the statutory development plan for the Borough, however, by publishing and submitting the Borough Local Plan for independent examination the Council has formally confirmed its intention to adopt the Publication Plan.

The Publication Version Local Plan, including its evidence base, are material considerations for decision-making. 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 Borough Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations significant weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Therefore, the weight afforded to each policy at this stage will differ depending on the level and type of representation to that policy. This is addressed in more detail in the assessment below where it is relevant to the application.

Note that it was agreed by Full Council on 27 April, when the Publication Plan was approved, 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.

Issue	Publication Local Plan Policy	Compliance	
Flood risk and sustainable drainage	8	Yes	No
Local character and design quality	28	Yes	No
Designated heritage assets	29	Yes	No
Amenity and living conditions	46	Yes	No

Supplementary Planning Documents

Conservation Areas
 House Extension and External Alterations

These policies can be found at:
https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance

Other Local Strategies or Publications

Other strategies or publications material to the proposal are:
 Twickenham Riverside Conservation Area Statement
 Twickenham Riverside Conservation Area Study

Determining applications in a Conservation Area

In considering whether to grant planning permission with respect to any buildings or other land in a conservation area, Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area. In this context, "preserving", means doing no harm.

To give effect to that duty, decisions of the court have confirmed that for development proposed to be carried out in a conservation area, a decision-maker should accord “considerable importance and weight” to the desirability of preserving or enhancing the character or appearance of the conservation area, when weighing this factor in the balance with other material considerations which have not been given this special statutory status. This creates a strong presumption against granting planning permission where harm to the character or appearance of a conservation area is identified. The presumption can be rebutted by material considerations powerful enough to do so.

In applications where the decision-maker is satisfied that there will be no harm to the character or

appearance of a conservation area, the statutory presumption against granting planning permission described above falls away. In such cases the development should be permitted or refused in accordance with the policies of the development plan and other material considerations.

6. EXPLANATION OF OFFICER RECOMMENDATION

The key issues for consideration are:

- i Design/Visual Amenity
- ii Neighbour Amenity
- iii Flood Risk
- iv Fire Safety

Issue i - Design/Visual Amenity

Policy

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.

Policy LP3 of the Local Plan 2018 covers Designated Heritage Asset and states that proposals should conserve and take opportunity to make positive contribution to the historic environment such as retaining and preserving the architectural features and materials.

The House Extensions and External Alterations SPD 2015 sets out that timber is preferable to UPVC as it lasts longer and because UPVC can never fully replicate the original appearance and is unsuitable.

The Twickenham Riverside Conservation Area Statement highlights a problem of the area to be the use of poor quality products in building works such as UPVC and that an opportunity for enhancement is preservation, enhancement and reinstatement of architectural quality and unit that is preferably based upon historic evidence.

The Twickenham Riverside Conservation Area Appraisal from 2023 sets out that the Conservation Area contains a wide variety of window styles and many unsympathetic replacements. It also echoes the Conservation Area Statement in highlighting the use of poor quality products in buildings work such as UPVC as a problem and pressure of the area.

Background

193 Richmond Road is an early 20th century shop unit with accommodation above within the Twickenham Riverside Conservation Area. It is two storeys (plus attic accommodation) in red brick under a slate roof. To the ground floor is a modern shopfront with the corbels and pilasters forming the only surviving historic features. Above are three timber sash windows, with a fourth over the vehicle access to the right of the shopfront. The larger dormer would have originally featured a pediment like the others on the parade, and one of the windows has been replaced with a top-opening casement. No.193 forms part of a parade of shops along the north side of Richmond Road at the junction with Crown Road. The quality of both the shopfronts and the windows above varies considerably, with unsympathetic uPVC units having a negative impact on the appearance of both the building and the wider parade.

This part of the Conservation Area is centred around Marble Hill Park and the surrounding 18th century development including Montpelier Road. The later development along Richmond Road, including the parade no.193 forms a part of reflects the expanding development of Twickenham in the late 19th and early 20th centuries and connection towards East Twickenham.

Proposal

This application is for the replacement of windows to no.193a at first and second floor level. The windows to the front are proposed to be timber one-over-one sashes and those to the rear are proposed to be uPVC double top-opening casements.

This application follows on from refused application 24/0063/FUL.

Assessment

No objections are raised regarding the proposed works. The use of timber windows to the front elevation is acceptable and appropriate for use in a conservation area. They would result in a small improvement to the appearance of the building, especially at second floor level, replacing an inappropriate top-opening casement. Double glazing is acceptable; seals and spacing bars should be white to blend in with the frames and trickle vents should be concealed within the frames and not visible from the outside.

The rear of no.193a makes less of a contribution to the Conservation Area and is not easily visible from public vantage points. In this instance and for these reasons, the use of uPVC windows is not objected to as they would have a very limited impact on the character and appearance of the Conservation Area.

Overall the proposed replacement windows are not considered to have a harmful impact on the character and appearance of the Twickenham Riverside Conservation Area.

This application is in accordance with policies LP1 and LP3 of the adopted local plan and policies 28 and 29 of the Publication Local Plan (Regulation 19 Version). It also conforms to paragraph 205 of the NPPF (2023).

Issue ii - 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 the location, siting, scale and nature of the proposal being for the replacement of existing windows with no increase in height or footprint of the building, the proposal would not have an adverse impact on the amenities of neighbouring occupiers in terms of loss of daylight/sunlight, overbearing or visual intrusion.

Given there is no change in the number of or siting of windows, the proposal does not result in any new lines of sight and so does not result in harmful overlooking or loss of privacy.

In view of the above, the proposal complies with the aims and objectives of policies LP8 of the Local Plan 2018.

Issue iii – Flood Risk

Policy LP 21 of the Local Plan states 'All developments should avoid or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.

The application site is at risk of surface water flooding.

As the works do not result in an increase in impermeable surface such as via increasing the footprint, there is no increase in flood risk is anticipated and so the proposal is consistent with LP21.

Issue iv – Fire Safety

London Plan Policy D12 requires the submission of a Fire Safety Statement on all planning applications. Where the applicant considers parts of or the whole policy do not apply, this should be justified in a Reasonable Exception Statement (RES).

The applicant has provided a Reasonable Exception Statement which satisfies the intent of Policy D12.

The applicant is advised that alterations to existing buildings should comply with the Building Regulations.

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. In making this recommendation consideration has been had to the statutory duties imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements set out in Chapter 16 of the NPPF.

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:23.05.2024.....

I agree the recommendation:



Team Leader/Head of Development Management/Principal Planner

Dated: ...23/05/2024.....