
Town Planning Statement

Sion Court, Sion Road, Twickenham, TW1 3DD

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1. Introduction

1.1. This Town Planning Statement is prepared by Savills on behalf of 'Moreland Residential (UK) Limited' ("the Client") to support a full planning application seeking permission for the redevelopment of the land at Sion Court, Sion Road, Twickenham, TW1 3DD ("the Site"). The site sits within the London Borough of Richmond upon Thames.

1.2. The planning application seeks full planning permission for:

"Demolition of 20 derelict garages and one bed flat and redevelopment of the site to provide 2, 1-bedroom and 3, 2-bedroom dwellings, associated private amenity space, communal amenity space, accessible parking space, cycle parking and refuse."

Accompanying Reports

1.3. This statement describes the development proposals and relates them to the relevant planning policy framework. It should be read in conjunction with the accompanying application drawings and following reports:

- Design and Access statement, prepared by Savills;
- Daylight and Sunlight Report (Within Development), prepared by Right of Light Consulting;
- Daylight and Sunlight Report (Neighbouring Properties), prepared by Right of Light Consulting;
- Preliminary Ecological Appraisal, prepared by AESG;
- Energy Statement, prepared by T16 Design;
- Fire Statement – National Requirements, prepared by AESG;
- Fire Statement – London Plan Requirements, prepared by AESG;
- Transport Statement, prepared by Caneparo Associates;
- Flood Risk Assessment, prepared by WHS;
- Arboricultural Impact Assessment, prepared by SJ Stephens Associates;
- Viability Report, prepared by Bailey Venning;
- Sustainability Statement, prepared by T16 Design; and
- Heritage Impact Assessment, prepared by HCUK Group.

Document Structure

1.4. This document comprises the following sections:

- Chapter 1- Introduction (this section);
- Chapter 2- Background;
- Chapter 3- Planning History;
- Chapter 4- The Proposal;
- Chapter 5- Planning Policy Context;
- Chapter 6- Planning Considerations; and
- Chapter 7- Conclusion and Sustainable Development.

2. Site and Surroundings

- 2.1. The site comprises 20 derelict garages and 1 no. flat located to the rear of Sion Court, Sion Road. The site is not locally listed, however is located in Twickenham Riverside Conservation Area. The surrounding area is of a mixed use, however predominantly residential. Twickenham Train Station and Town Centre are within walking distance away (9 minutes' walk).
- 2.2. The existing Sion Court itself is a substantial mansion block which occupies an important position within the surrounding townscape, due in part to its large scale and height in contrast to the generally more modest scale of surrounding buildings and spaces on the fringes of the Town Centre and along the River Thames. The five storey main elements of this courtyard block have been designed to address the surrounding road frontages both in their scale and detailing.
- 2.3. The immediate area is predominately residential in character, with uses along Richmond Road comprising predominantly residential with some mixed uses split between commercial at ground floor with residential uses above. The site has good access to open space, including Marble Hill Park located approx. 500m East, and Ham Lands Nature Reserve approx. 400m to the south.
- 2.4. The site is well-connected to transport routes, benefitting from an excellent PTAL rating of 5, where 0 is the worst and 6b is the best. These transport links include two bus stops within 100m north of the site to provide access to six bus routes; Twickenham Train Station approx. 600m to the north west with access to National Rail routes; and St Margaret's station approx. 800m north.
- 2.5. Within the surrounding area are a number of Buildings of Townscape Merit (BTM) and Listed Buildings. Notably, 19 & 21 Lebanon Park and the adjacent terraces on Ferry Road are designated BTMs.
- 2.6. Part of the application site falls within Flood Zone 2 as defined by the Environment Agency. This affects the single garage block and the southernmost portion of the longer garage block. The site also falls within an Archaeological Priority area.
- 2.7. The site is also situated within Throughflow Catchment Area (Throughflow and Groundwater Policy Zone).

3. Planning History

3.1. There is an extensive planning history related to this site (available on Richmond Council's website for viewing), however the most relevant planning applications include:

- **13/1352/FUL and 13/1482/CAC** - Demolition of an existing dwelling and garage blocks, erection of three new dwellings and cycle stores and associated landscaping (Permission Granted).
- **11/3709/FUL and 11/3710/CAC** - Demolition of an existing dwelling and garage blocks, erection of 4 no. new dwellings and associated landscaping. New balcony and cycle store (Permission Refused and Dismissed on Appeal).
- **03/0380/FUL** - Proposed roof top extension to create 5 additional self-contained residential units (Permission Refused and Dismissed on Appeal). Refused on the 2/04/2003 for the following reasons: the first reason relates design and scale. The second reason relates to the failure to provide adequate parking provision which would generate increased demand for on street car parking.
- **01/1387/FUL** - Conversion of three existing garages into a one bedroom studio flat - Refused on the 26/09/2001 *This application was refused on two grounds, the first being the loss of three garages without acceptable alternative provision. It was considered that the proposal would increase the demand for on-street parking, which would be detrimental to highway safety. The second reason for refusal was the standard of accommodation. The appeal was dismissed on 8.03.2002.* Alongside the above, a number of applications for new shopfronts and signage, as well as change of use of ground floor to other commercial uses, were also approved at the Site between 1971 – 2017.

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- 3.2. Most recently, in December 2023, application ref. 22/1757/FUL was refused and appeal dismissed for the *“demolition of 20 derelict garages and one bed flat and redevelopment of the site to provide two, two bed flats and three, two bed houses, associated private amenity space, communal amenity space, accessible parking space, cycle parking and refuse.”* See Section 6 below for more details.
- 3.3. This application is submitted to response to the recent dismissed appeal decision through a variety of amendments set out in this Statement.

4. The Development Proposal

4.1. The application seeks full planning permission for:

“Demolition of 20 derelict garages and one bed flat and redevelopment of the site to provide two, two bed flats and three, two bed houses, associated private amenity space, communal amenity space, accessible parking space, cycle parking and refuse.”

4.2. The proposals comprise the following:

- 5no. residential units comprising a mix of 2 x 1-bedroom and 3 x 2-bedroom dwellings.
- Cycle store to accommodate 28no. cycle parking spaces.
- 527 sqm of landscaped communal amenity space (an uplift of c.193 sqm in communal amenity space).
- 291 sqm of soft landscaping proposed in the new private gardens and green roof.

4.3. Each unit benefits from a private front door onto the courtyard. Entrances are set well back within private front gardens and are step-free from the street. Daily bins refuse/recycling collection for each unit are designed within the private front gardens and are step-free. Accessible parking space for Unit 1 is allocated from Lebanon Park entrance. Cycle storage is step free and easily accessed from front doors.

4.4. Unit 1 is M4(3) compliant and designed to be wheelchair accessible.

5. Planning Policy Context

5.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004:

“when making any determination under the Planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”

5.2. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act, the Development Plan for the site comprises the following:

- London Plan (2021);
- Richmond Local Plan (2018);
- Policies Map (2018);
- Material considerations include: the National Planning Policy Framework (NPPF) 2023; Planning Practice Guidance (PPG); regional and local supplementary planning guidance / documents (SPD/SPGs) and any other emerging policy and guidance and site specific circumstances.

National Planning Policy Framework

5.3. The NPPF was most recently updated in July 2023. The NPPF sets out the Government policies for England and how these should be applied. The following sections are considered of relevance to this proposal:

- Section 2- Achieving Sustainable Development
- Section 5- Delivering a sufficient supply of homes
- Section 6- Building a strong, competitive economy
- Section 7- Ensuring the vitality of town centres
- Section 11- Making effective use of land

- Section 12- Achieving well-designed places

The London Plan (2021)

5.4. The London Plan was last updated in 2021. The London Plan a Spatial Development Strategy which sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The following policies are considered of relevance:

- Policy GG2: Making the Best Use of Land
- Policy H1: Increasing Housing Supply
- Policy H2: Small Sites
- Policy H4: Delivering Affordable Housing
- Policy D3: Optimising Site Capacity through the Design-Led Approach
- Policy D4: Delivering Good Design
- Policy D5: Inclusive Design
- Policy D6: Housing Quality and Standards

Policy GG2: Making the Best Use of Land

5.5. Boroughs are encouraged to enable the development of brownfield land as well as utilising small sites.

Policy H1: Increasing Housing Supply

5.6. Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites.

Policy H2: Small Sites

5.7. Boroughs are encouraged to support well-designed new homes on sites smaller than 0.25ha in size through planning decisions and plan-making.

Policy H4: Delivering Affordable Housing

- 5.8. This policy sets out a strategic target of 50% affordable new homes across London, and requires affordable homes to be provided on site. Cash-in-lieu contributions are only accepted in exceptional circumstances. The policy highlights affordable housing contributions are triggered on sites providing 10 or more units.

Policy D3: Optimising Site Capacity through the Design-led Approach

- 5.9. This policy outlines a design-led approach to achieving optimal site capacity should be taken. This should take site context, capacity for growth, and existing and planned infrastructure into consideration. Incremental intensification can be achieved through small sites, while highest density developments should be located in the most sustainable locations, with good connections, and access to jobs, services and infrastructure.
- 5.10. Design is also an important factor to consider in determining density. Development proposals must enhance local context and positively respond to local distinctiveness through building form, scale and appearance. Development must also prioritise safety, inclusivity and residential amenity to achieve a positive experience for occupants.

Policy D5: Inclusive Design

- 5.11. Accessible and inclusive design should be achieved within all development proposals. This includes creating people-focused spaces, with no disabling barriers, and safe emergency evacuation for all building users.

Policy D6: Housing Quality and Standards

- 5.12. This policy requires developments to be of high quality design, with optimal internal layouts. All habitable rooms should meet the minimum space standards. Dual aspect dwellings must be maximised and there should be no north facing single aspect units. Residential development should allow for sufficient daylight / sunlight, provide adequate waste storage in an easily accessible location and provide external amenity space.

The London Borough of Richmond Upon Thames Local Plan (2018):

5.13. The London Borough of Richmond Upon Thames Local Plan was adopted 3rd July 2018. The Local Plan sets out the Council's vision for the borough until 2033. The following policies are considered of relevance:

- Policy LP1: Local Character and Design Quality
- Policy LP3: Designated Heritage Asset
- Policy LP8: Amenity and Living Conditions
- Policy LP15: Biodiversity
- Policy LP16: Trees, Woodlands and Landscape
- Policy LP17: Green Roofs and Walls
- Policy LP21: Flood Risk and Sustainable Drainage
- Policy LP22: Sustainable Design and Construction
- 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

Policy LP1: Local Character and Design Quality

5.14. This policy requires development to be of a high architectural and urban design quality. Urban design must be accessible and inclusive, with high quality landscaping and good design integrated to aid regeneration. Development proposals will have to demonstrate a thorough understanding of the site and how it relates

to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

Policy LP3: Designated Heritage Asset

- 5.15. This policy requires to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

Policy LP8: Amenity and Living Conditions

- 5.16. All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development.

Policy LP15: Biodiversity

- 5.17. The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans.

Policy LP16: Trees, Woodlands and Landscape

- 5.18. The Council require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

Policy LP17: Green Roofs and Walls

- 5.19. Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof.

Policy LP21: Flood Risk and Sustainable Drainage

- 5.20. This policy aims to 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.

Policy LP22: Sustainable Design and Construction

- 5.21. Developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change.

Policy LP24: Waste Management

- 5.22. The Council will ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced.

Policy LP34: New Housing

- 5.23. The Borough's target is 3,150 homes for the period 2015-2025 and specifically for Twickenham between is 1000-1050. This has been replaced by the London Plan target for the Borough which is now 4,110.

Policy LP35: Housing Mix and Standards

- 5.24. 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.

Policy LP36: Affordable Housing

- 5.25. This policy requires 50% of all housing units will be affordable housing, this 50% will comprise a tenure mix of 40% of the affordable housing for rent and 10% of the affordable intermediate housing. b. the affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery.

Policy LP39: Infill, Backland and Backgarden Development

- 5.26. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. Development should retain plots of sufficient width for adequate separation between dwellings and result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens.

Policy LP44: Sustainable Travel Choices

- 5.27. This policy aims 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: Parking Standards and Servicing

- 5.28. This policy requires 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 local environment, and ensuring making the best use of land.

6. Planning Considerations

6.1. This Section considers the Proposed Development in relation to relevant planning policy context for the Site and the previous reasons for refusal (application reference 22/1757/FUL) and its subsequent dismissed appeal (reference APP/L5810/W/23/3315130). The key areas of relevance to the development proposals are as follows:

- Consideration of Previous Reasons for Refusal
 - Effect on neighbouring residents
 - Living Conditions
 - Impact on sycamore tree
 - Affordable Housing
 - Flood Risk
- Principle of Development
- Housing Mix (inc. Accessible Housing)
- Housing Design Standards and Quality of Accommodation
- Affordable Housing
- Character, Design and External Appearance
- Residential Amenity
- Transport, Access and Parking
- Flood Risk and Drainage
- Ecology and Biodiversity
- Fire
- Energy

Consideration of Previous Reasons for Refusal and Appeal Dismissal

The reasons for the recent application being refused were:

1. Affordable Housing
2. Standard of Accommodation
3. Trees
4. Flood Risk
5. Residential Amenity
6. Cycle Parking

Contributing to Affordable Housing

6.2. The first reason for refusal within the Decision Notice for the refused permission states:

“In the absence of a legal agreement to secure an appropriate contribution towards offsite affordable housing, the scheme fails to address the recognised housing need and will be contrary to, in particular, policy LP36 of the Local Plan (2018) and Supplementary Planning Document on Affordable Housing (2018).”

6.3. Policy LP36 of the Local Plan requires contributions to affordable housing from all small sites, further details are set out in the Affordable Housing SPD. Using the Council’s small site calculator a policy compliant financial contribution of around £400k would be required for the proposed development.

6.4. Policy LP36 part D requires that:

6.5. *“Where a reduction to an affordable housing contribution is sought from the requirements in A and B 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. The Council will rigorously evaluate such appraisals and:*

- a) assess if the maximum reasonable amount of affordable housing is based on delivering the appropriate tenure, unit sizes and types that address local needs.*
- b) consider whether it is necessary to secure provision for re-appraising the viability of a scheme prior to implementation to secure contingent obligations.*
- c) in most circumstances the Existing Use Value plus a premium (EUV+) approach to assessing benchmark land value in development appraisals and viability assessments should form the primary basis for determining the benchmark land value.*

6.6. In accordance with Policy LP35 a Viability Assessment is submitted to support this application.

6.7. The Council’s reason for refusal concerned the absence of satisfactory evidence to justify a non-policy compliant financial contribution, and as such the scheme failed to address the recognised housing need and is contrary to, in particular, policy LP36.

- 6.8. The Inspector confirmed that the submitted Viability Report to support the scheme and the Council's revise of this had differing assumptions including with regard to the scheme value, build costs and the benchmark land value.
- 6.9. The Inspector found that the Council's approach to valuation was unrealistic and did not fully take account for full likely build cost and as the approach to determining likely values of the scheme was based upon asking prices of comparable properties, with adjustments, rather than actual sale prices.
- 6.10. A key dispute between the Council and Applicant was with regard to Benchmark Land Value having regard to the existing context of the site. Further detail on this are provided within the submitted Viability Report to support this application.

Standard of Accommodation

- 6.11. The second reason for refusal within the Decision Notice states:
- "2. Standard of Accommodation- The development, by reason of its layout, design and in the absence of satisfactory evidence to demonstrate the new units will benefit from adequate daylight, represents over-intensification and over-development of the site that would result in sub-standard living conditions and environment, to the detriment of the amenities of future occupiers and thus is contrary to local plan policy LP35, London Plan Policy D6, Supplementary Planning Document 'Residential Development Standards' and 'Design Quality' and the Technical Housing Standards - Nationally Described Space Standard (March 2015)."*
- 6.12. With regard to the first part of this reason for refusal relating to adequate daylight an updated Daylight and Sunlight Assessment was submitted along side the appeal. Subsequently the Council accepted that the additional information and revisions submitted with the appeal were acceptable with regard to first part of the above reason for refusal.

6.13. With regard to the second aspect of the above reason for refusal the Inspector expressed concerns with Unit 1 with regard to the living space being at the rear of the dwelling and the bedroom having a long outlook across the shared amenity space. In response to this, the internal arrangement of Unit 1 has been altered within this revised application. The living space is now at the front of the dwelling with the bedroom at the rear. To improve the light provided into this room and to respond to other refusal comments around amenity, the rear wall of Unit 1 has been moved inwards, creating a private amenity space and creating more daylight in the habitable room. The levels of daylight are supported by the submitted Daylight and Sunlight assessment.

Trees

6.14. The third reason for refusal within the Decision Notice states:

“3. Trees- In the absence of satisfactory arboricultural reports, lack of mitigation planting for removed trees and a poor site design and layout that fails to provide design separation space for tree and building to coexist, the scheme is considered to adversely impact on the health and longevity of existing trees and fails to comply with Local Plan (2018) policies LP3, LP15 and LP 16 and London Plan (2021) Policy G7.”

6.15. The development is sited close to a large sycamore tree that is protected by a Tree Preservation Order the value of which is not disputed. Owing to recent growth of the protected tree the tree would over-sail part of the proposed development and it is acknowledged in the Inspector’s Report that *“some pruning would be required, although such works do not form part of this proposals. The evidence shows that the tree has been managed as a pollard in the past and there is no indication that this has affected its health or longevity”*.

6.16. In response to the reason for refusal and the Inspector’s comments an updated Arboricultural Impact Assessment has been prepared and is submitted alongside this application. Within this report pruning of the protected tree is proposed. As it is acknowledged that pruning of the protected tree may adversely impact on residential amenity and local character. As a result substantial replacement planting, including provision of semi-mature trees, are proposed to mitigate against the proposed pruning.

6.17. In comparison to the existing context of the site, having regard to the 193 sqm increase in communal amenity space and 291sqm of private gardens and green roofs, which includes significant vegetation and tree planting, on balance the pruning of the protected tree is considered to be justified and in accordance with Policy LP16.

Flood Risk

6.18. The fourth reason for refusal within the Decision Notice states:

“4. Flood Risk- In the absence of insufficient details to demonstrate the scheme will not increase risk of flooding in the locality, the scheme fails to comply with Local Plan (2018) Policy LP21 and London Plan (2021) Policies SI12 and SI13.”

6.19. A revised Flood Risk Assessment was completed as part of the appeal and has subsequently updated and submitted to support this revised application.

6.20. The Inspector concluded that through utilising the proposed attenuation tank it is demonstrated that the requested maximum discharge rate of 2 l/s, the 100 year plus climate change greenfield equivalent is achieved. The Inspector concluded that the proposals would not increase flood risk and that the previous reason for refusal has been resolved. The proposals therefore comply with Local Plan Policy LP21 and London Plan Policies SI12 and SI13.

Residential Amenity

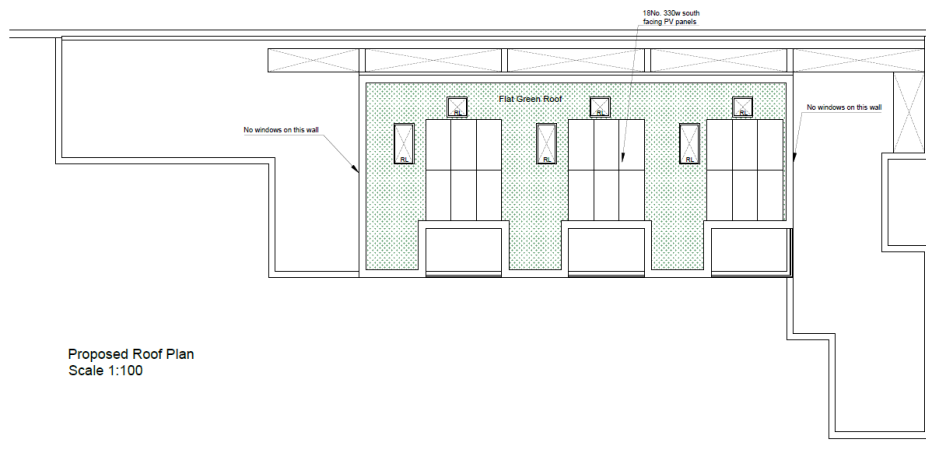
6.21. The fifth reason for refusal within the Decision Notice states:

“5. Residential Amenity- The proposed development, by reason of its combined siting, height and width will result in a visually intrusive and overbearing form of development that will adversely impact on the residential amenity of nearby occupants, in particular, the ground floor flat in Sion Court and no. 19 Lebanon Park thus fail to comply with Local Plan (2018) Policy LP8.”

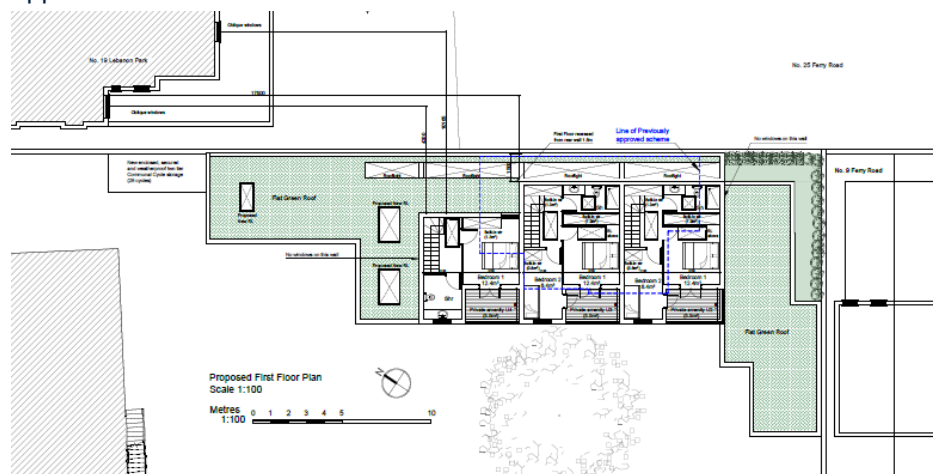
6.22. Within the appeal decision, the Inspector firstly dismissed any harmful impact of the proposal on the ground floor flat in Sion Court. It was also established that the effect on No 25 Ferry Road would be less significant as this property has a larger and more open-feeling garden, so the additional enclosure, while appreciable, would not result in harmful living conditions.

6.23. The Inspector agreed that the proposed development would enclose the garden of No 19 Lebanon Park and that there would also be an impact on No 9 Ferry Road. In order to respond to these concerns issues raised in the refusal and dismissal of the appeal, this revised application has set back the first floor of the development adjacent to No 19 Lebanon Park's Garden and the ground floor of Unit 1 along No 9 Ferry Road, as seen below.

Refused Application:



Revised Application:

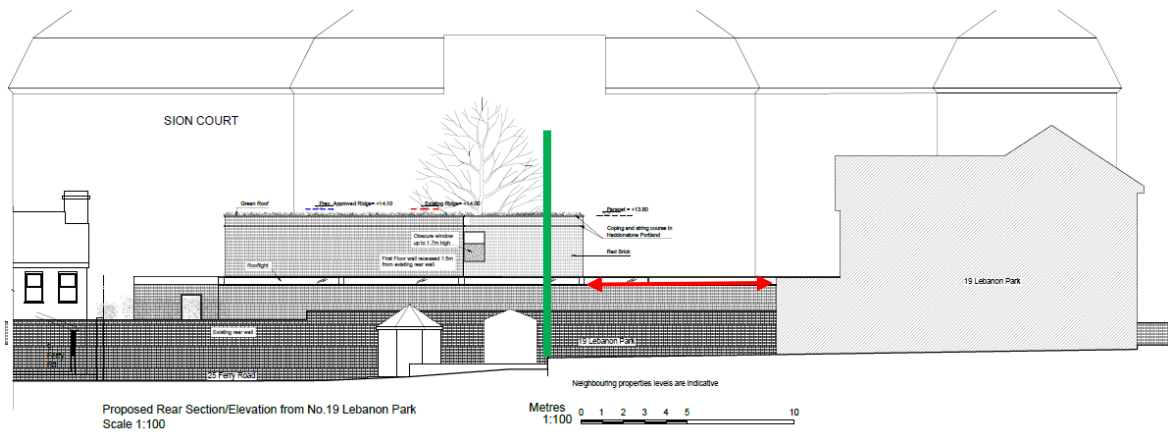


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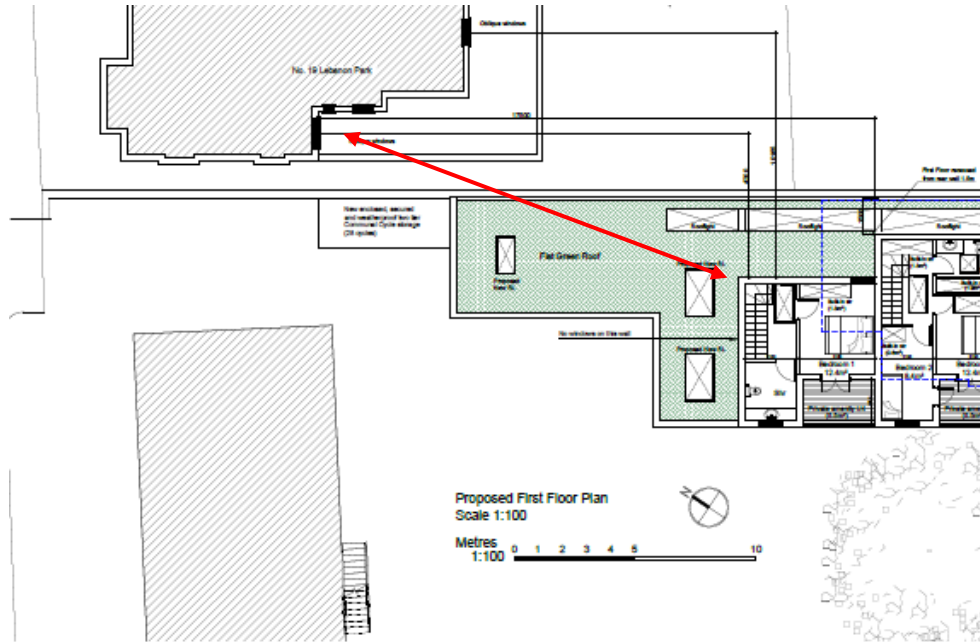


6.24. As is evident from the above at first floor level the updated proposals are both significantly set back from the boundary with 19 Lebanon Park and at its closest point are located further south. At an obscure angle a separation distance of between 18-23m now exists and there are no facing windows at first floor level. It is acknowledged in the Inspector's report that the distance between neighbouring windows and the proposed development is sufficient to avoid harmful overlooking. It is considered that the set back of the proposals, by circa 1.75m and the fact that there is now only a minor encroachment from the garden of 19 Lebanon Park to the south-west (the rear boundary treatment of 19 Lebanon Park is depicted by the green line below), addresses comments raised by the Inspector concerning the sense of enclosure to the garden of 19 Lebanon Park and results in an enhanced situation in comparison to the previously approved and existing building.

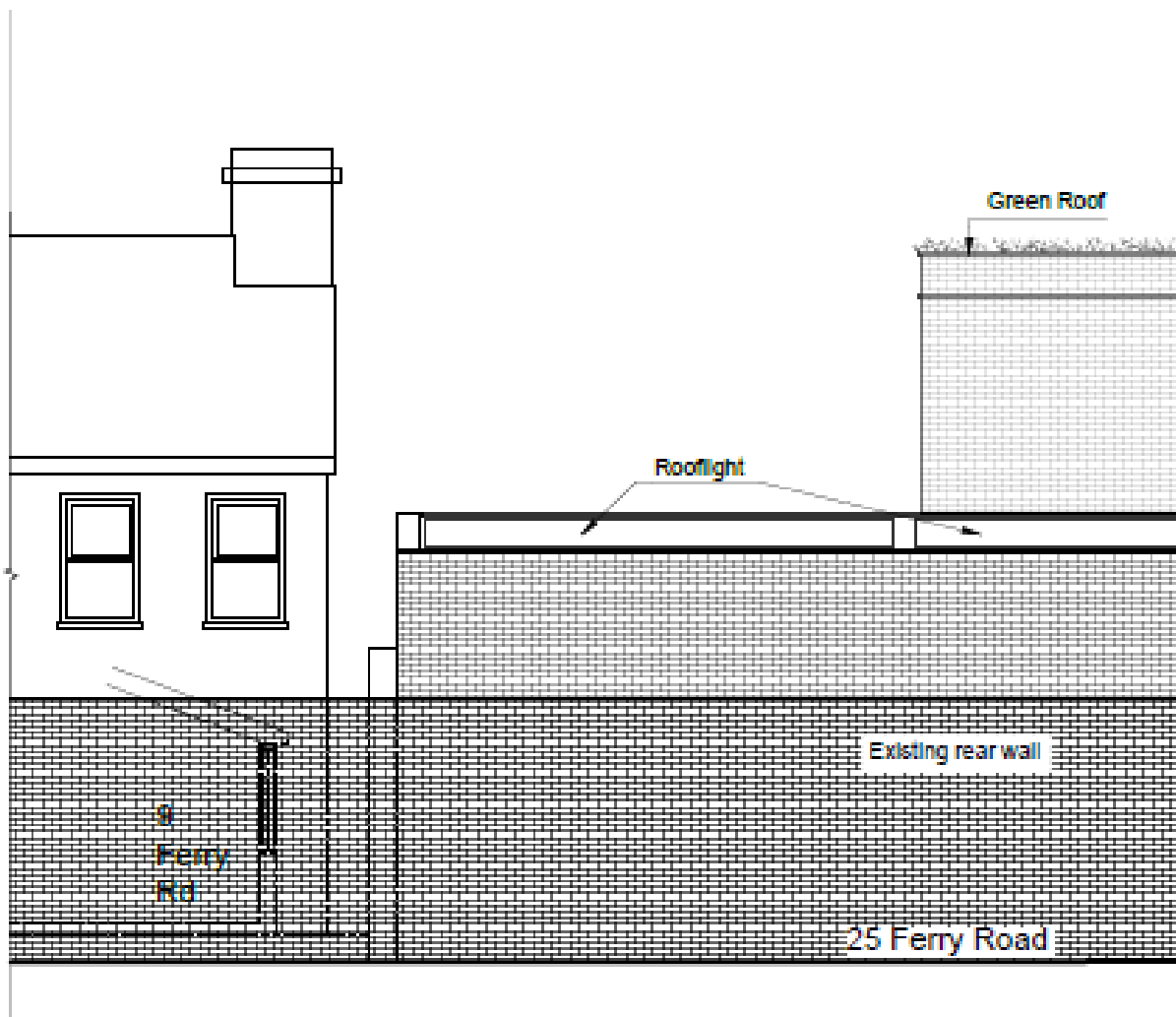


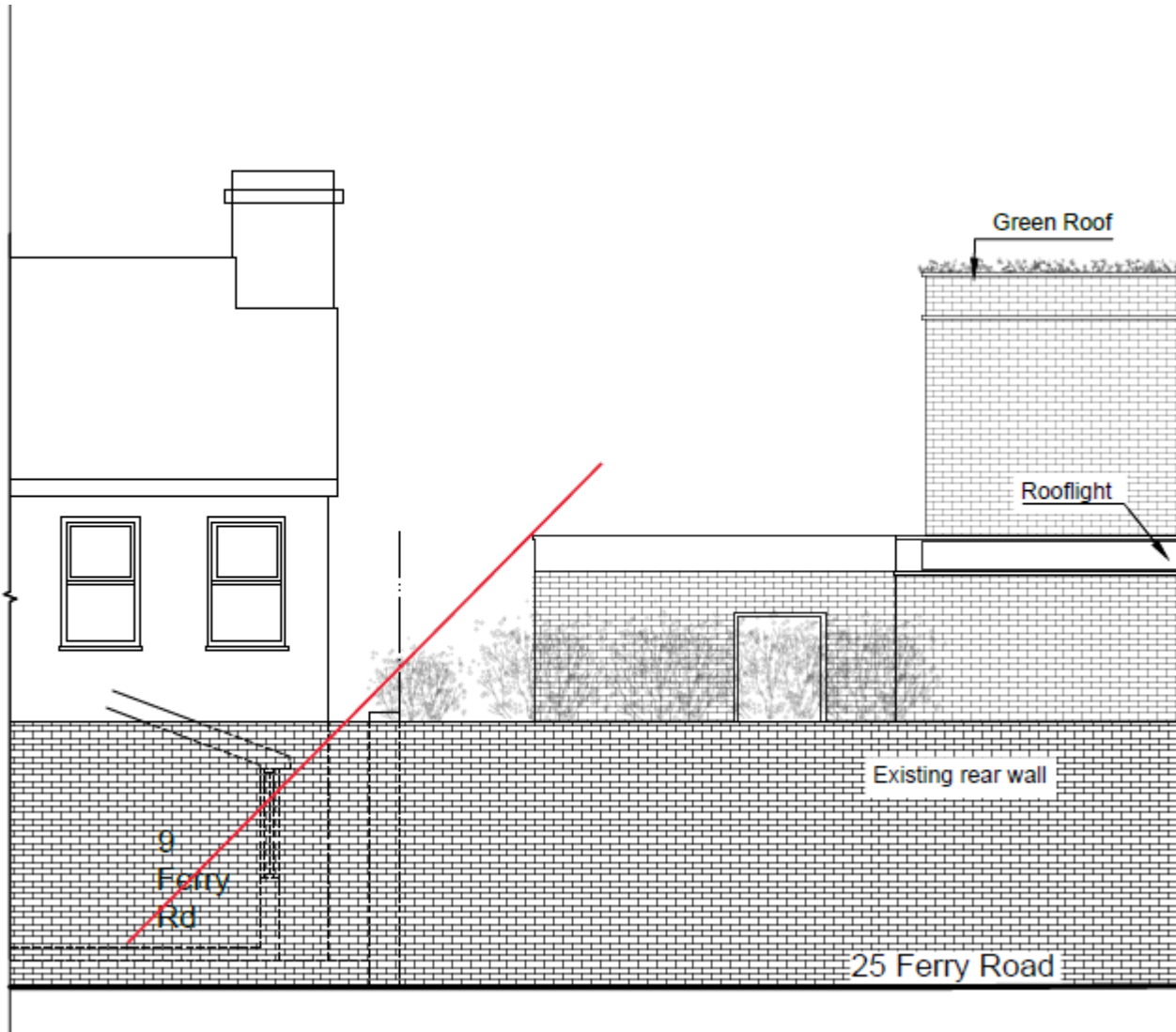
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- 6.25. The set backs proposed to the rear of Unit 1 result in a separation distance between the site boundary similar to that of No.9 Ferry Road. As a result the proposals are considered to result in an enhanced situation to the existing garages set behind a large boundary wall which remains.
- 6.26. Within the Inspectors report it is acknowledged that given the proximity of the refused scheme to the rear windows of 9 Ferry Road that the additional boundary height would harm the outlook from the rear window of No.9. The below section drawing (see red line on proposed drawings) shows that the updated proposals will be not be visible from the rear window of No. 9 as a result these comments made by the Inspector has been addressed. To further ensure privacy is maintained the facing bathroom window of Unit 1 is proposed to be obscured.





6.27. In summary it is considered that the proposed design by reason of its combined siting, height and width will not result in a visually intrusive and overbearing form of development. It will adversely not impact on the residential amenity of nearby occupants and therefore complies with Local Plan Policy LP8.

Cycle Parking

6.28. The sixth reason for refusal within the Decision Notice states:

“6. Cycle Parking- In the absence of details of existing on site cycle parking arrangements or justification for the absence of replacement cycle parking facilities, the loss of the garages, and absence of satisfactory replacement of existing on-site cycle parking spaces, the scheme fails to represent a sustainable form of development in this highly accessible location and would undermine the ability of residents to make sustainable travel choices and cycle use contrary to the aims and objectives of Local Plan (2018) policy LP44 and London Plan (2021) Policy T5.”

6.29. During the appeal process, the Council withdrew their reason for refusal relating to an insufficient provision of cycle parking. The Inspector stated there was no substantive evidence upon which to disagree with their position that no harm would arise in this regard.

6.30. The remaining planning considerations that were considered as acceptable by Officers in determining the previous application on the site are detailed below.

Principle of Development

6.31. The proposals comprise the demolition of the existing garages, extending at the rear of Sion Court. The proposed development intends to construct 5 dwellings on the site in replacement of the garages. The most recent refusal was of a larger footprint than that within this application. As stated in the Officer Report for application ref. 22/1757/FUL:

“The benefits arising from the contribution of additional residential units would be generally in accordance with Policy LP34 and London Plan policy H2 which proactively supports new homes on small sites. The supporting text to that policy states that “For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and planmaking”.”

The text continues to note that “Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London’s needs.” The site benefits from PTAL 5 and thus is within an area supported for incremental intensification and the net addition to the housing stock must be attributed weight as a benefit of the scheme.”

6.32. It is therefore established that the principle of development is accepted.

Housing Mix (incl. Accessible Housing)

6.33. Policy LP35 of the Local Plan 2018 requires a mix of housing types and sizes in development schemes.

The proposal includes the following housing mix:

Unit	Beds/Persons	GIA
Unit 1 (M4(3))	1 bed 2 person	55 sqm
Unit 2	2 bed 3 person	77 sqm
Units 3	2 bed 3 person	77 sqm
Unit 4	2 bed 3 person	77 sqm
Unit 5	2 bed 3 person	65 sqm

6.34. The Unit mix has been amended in terms of Unit 1 becoming a 1 bed 2 person unit. This was due to objections of the unit layout which have been resolved but resulted in the loss of a single bedroom. The proposed layout of unit 1 meets the requirements of both the Local Plan and London Plan whilst still delivering a M4(3) unit.

Housing Design Standards and Quality of Accommodation

6.35. London Plan Policy D6 places a significant focus on internal space standards for dwellings. The purpose of the policy is to ensure that all new homes are fit for purpose and offer the potential to be occupied over time by households of all tenures. Local Plan Policies LP8 and LP35 seek to ensure that all housing development is provided to a satisfactory quality.

Internal Space Standards

6.36. All 5 units proposed meet the Nationally Described Space Standard and therefore are compliant with Policy LP35 of the Local Plan and Policy D6 of the London Plan.

Unit	Beds/Persons	GIA	NDSS
Unit 1 (M4(3))	1 bed 2 person (one storey)	55 sqm	50 sqm
Unit 2	2 bed 3 person (two storey)	77 sqm	70 sqm
Units 3	2 bed 3 person (two storey)	77 sqm	70 sqm
Unit 4	2 bed 3 person (two storey)	77 sqm	70 sqm
Unit 5	2 bed 3 person (one storey)	65 sqm	61 sqm

6.37. As demonstrated above, each unit meets or exceeds the minimum internal floorspace standards of London Plan Policy D6 and the Nationally Described Space Standards (2015) and are therefore acceptable in this regard.

Amenity Space

6.38. External amenity space has already been considered under application reference 22/1757/FUL. The Case Officer stated the following:

“The units appear to have adequate private amenity space albeit the useability and quality of the amenity space is questionable given the front siting and exposed nature of the site. Although this is far from ideal it is recognised that the lack of privacy to the amenity areas could be accepted, as per the logic in approved application 13/1352/FUL, subject to appropriate landscaping. This could be secured by condition. On this basis, the quality of outdoor amenity space is considered acceptable and would not warrant sufficient reason for refusal.”

- 6.39. The proposed private amenity has remained unchanged from the previous application other than within Unit 1. This is due to the rear wall of Unit one being brought in and therefore creating additional amenity space to the rear of the dwelling.

Daylight / Sunlight

- 6.40. The submitted Daylight and Sunlight Assessment sets out an assessment using Target Daylight Factor (TDF) to assess internal light levels. It takes into account such factors as window size, number of windows available to the room, room size and layout, room surface reflectance, and the angle of visible sky reaching the window. It confirms the new residential units will benefit from daylight levels in excess of the requirements. As such, the proposals will provide a healthy day-lit environment for future occupants in accordance with Policy LP8 of the Local Plan.

Viability

- 6.41. The viability appraisal exercise has been undertaken using the latest appraisal Argus toolkit and utilises up to date build costs provided by the applicant's surveyor and up to date sales values and follows the latest published RICS guidance on viability in planning.
- 6.42. The supporting viability statement assesses the economic viability, when measured against the benchmark land value established from the existing use value of the site plus a premium, and including the required level of CIL payments, the residual land value in the appraisal is positive and would be capable of accommodating an affordable housing or other Section 106 obligation.

Character, Design and External Appearance

- 6.43. The character and design of the development has already been established through the previous application. The contemporary design compared to the surrounding development, is considered to be appropriate in design terms and mass.
- 6.44. The massing has in fact been reduced within this application and therefore is considered

Residential Amenity

- 6.45. Supporting paragraph 4.8.8 of Policy LP8 and the Council's SPD on Small and Medium Housing Sites states that in order to make sure that the privacy of occupiers is respected, the window-to-window distance should preferably be no less than 20m apart. Where principal windows face a wall that contains no windows separation distances can be reduced to 13.5 metres.
- 6.46. Regarding separation distances at the ground floor level, the proposed site plan submitted in support of this Appeal overlays the previously approved scheme. This plan demonstrates through the blue line boundary (showing the extent of the previously approved proposals) that there are no reductions in the facing separation distances of the proposed scheme from this previous approval. The 50cm difference in separation distance as stated in the Officers Report is therefore disputed by the Appellant.
- 6.47. As set out in sections 6.19 – 6.22, the proposed development has been reduced in terms of the first floor and ground floor of Unit 1. This significantly reduces the impact on No 19 Lebanon Park and No 9 Ferry Rod, making the harm less than substantial. The refusal for the most recent application referred to other neighbouring dwellings be caused harm by the development but these were dismissed by the Inspector at appeal.

Transport, Access and Parking

- 6.48. Car parking will not be provided for the 4 additional residential units and the Applicant is willing to accept a permit-free agreement for these dwellings to prevent new residents from parking their vehicles on-street.
- 6.49. A total of 14 two tier racks (28 spaces) will be provided for the new residential units and visitors to the Site, which is in accordance with London Plan minimum cycle parking standards. These will be located within a secure, enclosed and weatherproof storage area located external to the residential units.
- 6.50. It has been calculated that during the worst-case scenario peak hour, up to 4 trips will be made to and from the proposed units. It is anticipated that the majority of trips will be made by public transport modes, with a small proportion also undertaken by walking and cycling. It is therefore considered that the impact of the proposals on the public transport network will be minimal.

- 6.51. All servicing and refuse collection for the proposed units will continue to be undertaken on street as per the existing situation. Each of the residential units will be provided with internal refuse storage and site management personnel will transport waste from the residential units to the allocated refuse store as part of the waste management regime.
- 6.52. The proposals are therefore acceptable and in accordance with the aims and objectives of Local Plan (2018) policy LP44 and London Plan (2021) Policy T5.

Flood Risk and Drainage

- 6.53. As stated in sections 6.16 – 6.18, the Inspector concluded that the Flood Risk would not be increased by the proposed development and that a reduction to greenfield run-off rates is achieved where feasible.
- 6.54. The attenuation that is provided would reduce the likelihood of this happening in most rainfall events and there would, therefore, be significant betterment over the existing situation. While it may be desirable for all rainfall to be fully accommodated on site in all foreseeable events, the proposal would not increase flood risk and would, therefore, comply with the general aims of Policy LP21 of the Local Plan and Policies SI12 and SI13 of the London Plan.

Ecology and Biodiversity

- 6.55. A Preliminary Ecological Appraisal (including a biodiversity net gain calculation) has been submitted in support of this application.
- 6.56. This survey aimed to establish the ecological value of this site and the presence/likely absence of notable and/or legally protected species - particularly bats - to inform appropriate mitigation, compensation, and enhancement actions regarding a proposed renovation.
- 6.57. It is recommended that the Sycamore tree and the Birch trees to be retained as part of the proposed plans are protected in accordance with 'BS 5837' which is in line with the proposal.

- 6.58. Given the light levels already present in the area, the appraisal provides light mitigation methods that should be used within the proposal such as the use of low-UV warm-white LED bulbs with directional, downward facing and shielded lights.
- 6.59. All trees on site were assessed for roosting potential from ground level. No features of value to roosting bats were identified and therefore no further surveys are required.
- 6.60. Biodiverse Green Roofs with PV panels are proposed on the top roof of the proposed building. These roofs will combine the vegetation underneath the PV panels (biosolar). The substrate used for the biosolar roof should be nutrient-poor, and composed of recycled material.
- 6.61. The proposed development will retain the majority of the existing ecological features whilst enhancing the communal and private landscaped areas as well as the provision of a number of new trees and intensive green roofs on flat roofs of the proposed apartments.
- 6.62. After inputting the baseline ecology elements onto the biodiversity metric 3.1 calculator as well as the proposed layout with the new features, a biodiversity net gain of 28.5% is achieved, with a net gain in hedgerow units of 36.04%. Appendix B shows screen shots of the biodiversity metric tool calculator habitat baseline and habitat creation values as well as the results. As a result, the proposal is compliant with Policies LP15, LP16 and LP17 of the Local Plan.

Energy and Sustainability

- 6.63. A supporting Energy Statement has been submitted. The report assesses the predicted energy performance and carbon dioxide emissions of the proposed development in the context of local and Londonwide policy requirements and best practice methods.
- 6.64. The findings of the report show how the site will meet the policy requirement of achieving a 35% reduction in emissions through the Be Lean, Be Clean, Be Green hierarchy.
- 6.65. Alongside the submitted Sustainability Statement, the required sustainable construction checklist has also been completed for the development. This scored a total of 53.5, giving it a rating of B, meaning it helps significantly improve the Borough's stock of sustainable developments.

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6.66. Measures to be included within the design cover areas such as reductions in potable water use, resource efficiency and pollution reduction both through the build process and post-occupation,

7. Conclusion

- 7.1. This Town Planning Statement has been prepared on behalf of Moreland Residential (UK) Limited' to support a full planning application for the development of Sion Court, Sion Road, Twickenham, to deliver a high quality development of 5 new dwellings.
- 7.2. The 6 reasons for refusal of the previous planning application have been addressed, and amendments have been made to the proposed development to resolve the reasons for the dismissal of the Appeal.
- 7.3. This Town Planning Statement has assessed the Proposed Development against the prevailing planning policy framework, having regard to material considerations. It demonstrates that the Proposed Development is acceptable in planning terms, noting its compliance with Development Plan policies, and having regard to the Planning Guidance SPD, the NPPF and having addressed the reasons for refusal and dismissal of the previous application.
- 7.4. Paragraph 11 of the NPPF states that in applying the presumption in favour of sustainable development, for decision-taking, this means approving development proposals that accord with an up-to-date Development Plan without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in NPPF as a whole. Furthermore, the presumption in favour of development is applicable in the borough. This means that the 'tilted-balance' should be applied in assessing this application, such that the delivery of new homes should be given significant weight. Given that the proposal does not adversely affect any protected areas or assets of particular importance as defined in the NPPF (habitat sites, sites of special scientific interest, green belt, local green space, areas of outstanding natural beauty, national parks, heritage coats, irreplaceable habitats, designated heritage assets and areas at risk of coastal change), and that it has been demonstrated to be acceptable in flood risk terms, planning permission should be granted. Furthermore, there would not be any adverse impacts of granting planning permission, which would demonstrably outweigh the benefits of the development when assessed against the policies in the NPPF as a whole.

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7.5. This Statement, and supporting application documents, has demonstrated that the proposal does not adversely affect any protected areas or assets of particular importance as defined in the NPPF. Furthermore, there would not be any adverse impacts of granting planning permission, which would demonstrably outweigh the benefits of the development as outlined below:

- The proposals will optimise the potential of a sustainably located site, with excellent links to public transport and access to local facilities and services, which comprises existing poor architectural quality;
- The proposals will deliver 5 new homes, including a wheelchair homes which all meet or exceed space standards and provide private and communal amenity space;
- Car-free development which promotes travel by sustainable travel modes, such as walking, cycling and public transport.

7.6. The quality of residential development has been considered, and improved, throughout the design process. The scale, massing and external appearance have also been designed with consideration to the site's local context, and townscape views. The impact on neighbouring residents has been largely considered within the proposal and major amends completed since the recent dismissed appeal.

7.7. The proposed development therefore complies fully with the Development Plan and the objectives of the NPPF. Therefore the optimisation of the Site to deliver new homes should therefore be strongly supported and the presumption in favour of sustainable development should be applied such that planning permission is granted without delay.

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Appendix 1 Officer's Report

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Appendix 2 Appeal Decision

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