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**Environment Directorate**  
**PLANNING**

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Michael Speer  
[mcspeeruk@gmail.com](mailto:mcspeeruk@gmail.com)

26 June 2024

**BY EMAIL ONLY**

Dear Mr Speer,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

**LOCATION: 29 HARTINGTON ROAD, TWICKENHAM, TW1 3EL**  
**PROPOSAL: PROPOSED FIRST FLOOR REAR EXTENSION AND REBUILD OF EXISTING GROUND FLOOR EXTENSION.**

I write in reference to your pre-application scheme received at the Local Planning Authority (LPA) on 22<sup>nd</sup> April 2024. On the basis of this information I have the following comments to make.

Site Description

The property is a two-storey terraced dwelling house located on the southern side of Hartington Road in Twickenham. The surrounding area is predominately residential.

The subject property is designated as:

- Area Susceptible To Groundwater Flood - Environment Agency (Superficial Deposits Flooding - >= 75% - SSA Pool ID: 183)
- Article 4 Direction Basements (Article 4 Direction - Basements / Ref: ART4/BASEMENTS / Effective from: 18/04/2018)
- Community Infrastructure Levy Band (Higher)
- Critical Drainage Area - Environment Agency (St Margarets [Richmond] / Ref: Group8\_002 / )
- Increased Potential Elevated Groundwater (GLA Drain London)
- Protected View (Indicative Zone) (N\_View\_004 View from near Ham House to

- Orleans House)
- Protected View (Indicative Zone) (N\_View\_005 View to Marble Hill House (north))
  - Risk of Flooding from Surface Water 1 in 1000 chance - Environment Agency (RoFSW Extent 1 In 1000 year chance - SSA Pool ID: 46412)
  - Risk of Flooding from Surface Water 1 in 1000 chance - Environment Agency (RoFSW Extent 1 In 1000 year chance - SSA Pool ID: 46430)
  - Surface Water Flooding (Area Less Susceptible to) - Environment Agency ()
  - Surface Water Flooding (Area Susceptible to) - Environment Agency ()
  - Take Away Management Zone (Take Away Management Zone)
  - Throughflow Catchment Area (Throughflow and Groundwater Policy Zone) (Adopted: October 2020 , Contact: Local Plan Team )
  - Village (St Margarets and East Twickenham Village)
  - Village Character Area (South of Amyand Park Road - Area 5 St Margarets Village Planning Guidance Page 24 CHARAREA07/05/01)
  - Ward (St. Margarets and North Twickenham Ward)

Relevant planning history for the site includes:

- **24/0297/HOT**- Proposed First Floor Rear Extension and Rebuild of Existing Ground Floor Extension. **Refused.**

Reasons for refusal – Design

The proposed development, by reason of its combined scale, siting and massing would constitute a visually incongruous, highly visible, and overly dominant development which would dominate the original scale of the existing dwellinghouse. The development would therefore be detrimental to the character and appearance of the area and host building. As such, the proposal fails to comply with, in particular, policy LP1 of the Local Plan (adopted 2018), and the House Extensions and External Alterations Supplementary Planning Document (May 2015).

Reasons for refusal – amenity

The proposed extension, by reason of its combined siting, scale and depth, will result in an overbearing and visually intrusive form of development, harmful to neighbouring occupiers. The proposed development fails to comply, in particular, with policy LP8 of the current Local Plan (2018), the new Publication Local Plan (Regulation 19 version) and the Supplementary Planning Document on 'House Extensions and External Alterations' (2015).

### Proposal

This pre-application seeks advice on the extension of the existing dwellinghouse. Specifically, a first floor rear extension and the rebuilding of the existing ground floor rear extension.

### Relevant Policies

All policies and Supplementary Guidance and Documents are available to view on the Council's website [www.richmond.gov.uk](http://www.richmond.gov.uk). Consideration must also be given to policies in the London Plan and National Planning Policy Statements. Relevant local plan policies are summarised below.

#### *Local Plan*

- LP 1 Local Character and Design Quality
- LP 8 Amenity and Living Conditions

#### *Supplementary Planning Documents/ Guidance*

- St Margarets Village – Village Plan

- Housing Extensions and External Alterations

*Richmond Publication Local Plan (Regulation 19 version)*

The Richmond Publication Version Local Plan (Regulation 19 version) and its supporting documents, including all the Regulation 18 representations received, was considered at Full Council on 27 April. Approval was given to consult on the Regulation 19 Plan and, further, to submit the Local Plan to the Secretary of State for Examination in due course. The Publication Version Local Plan, including its accompanying documents, have been published for consultation on 9 June 2023. Together with the evidence, the Plan is a material consideration for the purposes of decision-making on planning applications. The weight to be given to each of the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. As the Council considers the emerging Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Note that it was agreed by Full Council that no weight will be given to Policy 4 in relation to the increased carbon offset rate, and therefore the existing rate of £95/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.

- Policy LP1 Local Character and Design Quality
- Policy LP8 Amenity and Living Conditions

Professional comments:

The LPA considers that the main issues associated in this enquiry relate to the following:

- Design and impact on heritage assets
- Neighbour Amenity
- Fire safety
- Flood Risk

**Design**

*In Chapter 12 of the NPPF, Paragraph 134 advises that poorly designed developments should be refused, especially where designs do not reflect local design policies, guidance and supplementary planning documents. It also says that significant weight should be given to designs which reflect local character, or to ones which are innovative designs in achieving high levels of sustainability, or which help improve the general standard of design in an area and fit in with the 'overall form and layout of their surroundings'.*

*Policy D4 of the London Plan states that the ' design of development proposals should be thoroughly scrutinised' and that 'design quality development should be retained through to completion'.*

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

*The Councils SPD relating to House Extensions and External Alterations states that the overall shape, size and position of side and rear extensions should not dominate the existing house or its neighbours. It should harmonise with the original appearance, either by integrating with the house or being made to appear as an obvious addition.*

*“Extension is made to appear as an obvious addition which is subordinate to the main structure, so that the original form can still be appreciated. In such circumstances, the ridge of the extension should be set lower to that on the main house”.*

*The Councils SPD relating to Residential Development Standards House Extensions states that ‘the footprint and room sizes of all residential proposals should adequately reflect the use and type of accommodation. Where floor areas and room sizes do not meet the following baseline standards, it is up to the applicant to demonstrate the functionality of the rooms by portraying the main furniture items of conventional size in the floor plans’*

The existing dwelling is a two-storey terraced dwelling with the adjoining properties that are of corresponding style and appearance.

The pre-application scheme involves a part first floor rear extension and a single storey ground floor rear extension. The proposed materials match that of the existing dwelling, with a render plaster for the walls and a flat roof.

The application previously refused for the subject property, although similar in certain aspects differs to the current proposed as first floor rear extension was deeper at 3.7m, which had a negative impact on the sunlight received to the habitable room at the adjoining property. The proposed extension was therefore considered to have an unacceptable impact on the amenity of the of the adjoining property, and given its size and scale an incongruous feature, which dominated the rear of the host building.

This application, therefore, failed to comply with the established guidance of the SPD and proposed a development which was overly dominant and visually incongruous to the host building and the character of the street scene.

As for the proposed rebuilding of the ground floor extension, a depth of 4.227m is anticipated to have an unacceptable impact on the amenities of the adjoining and is suggested to be reduced to comply with technical guidance of the SPD. The technical guidance requires single storey rear extensions to have a proposed depth of 3m for terraced dwellings.

The current proposal, having a shorter rearward projection, lessens the impact on the host building, adjoining neighbours in terms of loss of sunlight and outlook.

Therefore, with the inclusion of the aforementioned changes, the proposed is not considered to result in harm to the existing character of the area and streetscene.

### **Living conditions**

The SPD for residential standard states that ‘*In all dwellings the main bedroom (double) should be 12 sqm, at least 2.6m wide. Any single bedrooms should be at least 7 sqm*’ the proposed bedroom complies with the SPD and 7sqm.

### **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.*

*Council’s SPD specifies that the overall shape, size and position of side and rear extensions should not dominate the existing house or its neighbours. They should harmonise with the original appearance, which should be taken as the starting point for any future changes.*

This section has been assessed based on a desk top review of the proposed alterations. A detailed assessment can only be undertaken at formal application stage when the Officer has the benefit of a site visit and adjoining neighbours have been consulted.

- No undue impact on no. 31 would be anticipated.
- There are no overlooking features proposed to the rear of the building that would offer direct views to the rear of the adjoining properties.

However, although the redesigned proposal proposes a reduced depth of the first-floor rear extension, this may still have a negative impact on the bedroom window at no.27. As such, it is recommended that this window be shown on any future drawings submitted for review and that the drawings clearly shows compliance with the 45-degree BRE line from the mid-point of this window. If the first-floor extension does not comply with this, you are recommended to reduce the length of the first-floor extension further.

## **Other Matters**

### *Community Involvement*

At this stage neighbours have not been notified of this pre-application enquiry. However, the Council encourages a statement of community involvement to be submitted with any submission. If you do decide to pursue this scheme, whether in the current or an amended version, prior to submission it is strongly advised that you should consult with neighbours.

### *Fire Safety Strategy*

As specified in Council's validation checklist, all developments are required to provide a Fire Safety Strategy to demonstrate compliance with the criteria outlined in Policy D12(A) of the London Plan 2021.

Any future application will need to be accompanied with a Fire Safety Strategy that:

a) set out the relevant qualifications and experience of the author, proportionate to the development. For smaller schemes the author should justify their competency to write the PFSS.

### *Flood Risk Assessment*

Policy LP 21 'Flood Risk and Sustainable Drainage' states that 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. Given the designation of the subject property any future application should be accompanied by a flood risk assessment showing compliance with Policy LP 21 of the Local Plan (2018).

b) The submitted drawings should address the requirements set out at paragraphs 3.12.3 and 3.12.4 of the London Plan.

## **Validation Checklist**

Notwithstanding the above, you are advised to refer to the national list of requirements and the Council's Local Validation Checklist before submitting a full application - [https://www.richmond.gov.uk/media/18491/local\\_validation\\_checklist\\_for\\_all\\_applications.pdf](https://www.richmond.gov.uk/media/18491/local_validation_checklist_for_all_applications.pdf)

Any future application would need to be accompanied with a copy of the following:

- Completed application form with correct Certificate of Ownership
- Completed CIL form

- Site Location Plan
- Existing and proposed plans and elevations including scale bar
- Fire Safety Strategy
- Flood Risk Assessment
- Statutory Planning fee of £206

### Summary

- No objection to the proposed part first floor rear extension and the ground floor rear extension from a design perspective.
- The reduced first floor rear extension element may still have a negative impact on the adjoining bedroom window at no.27. As such, it is recommended that this window be shown on any future drawings submitted for review and that the drawings clearly show compliance with the 45-degree BRE line from the mid-point of this window. If the first floor extension does not comply with this, you are recommended to reduce the length of the first floor extension further.

The applicant is also advised to review the additional requirements for fire safety and flood risk assessment as outlined on the validation checklist.

### Without prejudice

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

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstance may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

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

Yours sincerely

Chris Tankard Team Manager - North Area

Development Management London Borough of Richmond Upon Thames