

Application reference: 24/1597/HOT TWICKENHAM RIVERSIDE WARD

Date application received	Date made valid	Target report date	8 Week date
24.06.2024	01.07.2024	26.08.2024	26.08.2024

Site:

26 Amyand Park Road, Twickenham, TW1 3HE,

Proposal:

Construction of basement with front lightwell, single storey side/rear infill extension, alterations to fenestration, removal of render and addition of rooflight to outrigger.

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

APPLICANT NAME

Mr. Mariusz Szewczyk
26 Amyand Park Road
Twickenham
TW1 3HE

AGENT NAME

DC Site Notice: printed on 01.07.2024 and posted on 12.07.2024 and due to expire on 02.08.2024

Consultations:

Internal/External:

Consultee

14D Urban D
LBRUT Transport
LBRuT Lead Local Flood Authority
LBRUT Transport

Expiry Date

15.07.2024
15.07.2024
15.07.2024
26.08.2024

Neighbours:

29 Amyand Park Road, Twickenham, TW1 3HB, - 01.07.2024
27 Amyand Park Road, Twickenham, TW1 3HB, - 01.07.2024
31 Amyand Park Road, Twickenham, TW1 3HB, - 01.07.2024
33 Amyand Park Road, Twickenham, TW1 3HB, - 01.07.2024
20 Devoncroft Gardens, Twickenham, TW1 3PB, - 01.07.2024
19 Devoncroft Gardens, Twickenham, TW1 3PB, - 01.07.2024
18 Devoncroft Gardens, Twickenham, TW1 3PB, - 01.07.2024
17 Devoncroft Gardens, Twickenham, TW1 3PB, - 01.07.2024
28 Amyand Park Road, Twickenham, TW1 3HE, - 01.07.2024
24 Amyand Park Road, Twickenham, TW1 3HE, - 01.07.2024
26 Amyand Park Road, Twickenham, TW1 3HE -
,,,TW1 3HE -
40 Amyand Park Road, Twickenham, TW1 3HE -
32 Amyand Park Road, Twickenham, TW1 3HE -
38 Amyand Park Road, Twickenham, TW1 3HE -
46 Amyand Park Road, Twickenham, TW1 3HE -

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

Development Management

Status: REF

Date: 09/10/2023

Application: 23/2254/HOT

Rear roof extension. Two roof lights to the front roof slope. Removal of render to front elevation. New windows to front elevation and new front door.

Development Management

Status: GTD Application:24/0026/HOT
Date:19/02/2024 Roof extension, side extension and roof lights to the front roof slope.

Development Management

Status: GTD Application:24/1480/VRC
Date:15/07/2024 Variation of planning approval 24/0026/HOT - Condition Number(s):
U0175295 Approved Drawings to allow for; altered position of windows
within dormer, addition of rooflight to dormer roof and alteration to size of
approved rooflight.

Development Management

Status: PDE Application:24/1597/HOT
Date: Construction of basement with front lightwell, single storey side/rear infill
extension, alterations to fenestration, removal of render and addition of
rooflight to outrigger.

Building Control

Deposit Date: 31.01.2008 Installed a Gas Boiler
Reference: 08/COR00308/CORGI

Building Control

Deposit Date: 11.04.2017 Install replacement window in a dwelling
Reference: 17/FEN00845/FENSA

Building Control

Deposit Date: 22.04.2021 Install a gas-fired boiler
Reference: 21/FEN01605/GASAFE

Building Control

Deposit Date: 01.03.2024 Side infill ground floor extension with associated structural work and addition
of ground floor WC under stairs, movement of first floor bathroom and loft
conversion with en suite bathroom to an existing 2 storey dwelling.

Reference: 24/0264/IN

Enforcement

Opened Date: 13.05.2024 Enforcement Enquiry
Reference: 24/0236/EN/NAP

Enforcement

Opened Date: 10.07.2024 Enforcement Enquiry
Reference: 24/0335/EN/UBW

Enforcement

Opened Date: 08.08.2024 Enforcement Enquiry
Reference: 24/0396/EN/NAP

Application Number	24/1597/HOT
Address	26 Amyand Park Road, Twickenham, TW1 3HE
Proposal	Construction of basement with front lightwell, single storey side/rear infill extension, alterations to fenestration and addition of rooflight to outrigger.
Contact Officer	Kerry McLaughlin

1. INTRODUCTION

This application is of a nature where the Council's Constitution delegates the authority to make the decision to Officers rather than it being determined by the Planning Committee.

Before preparing this summary report the planning officer has considered any relevant previous planning applications in relation to the development and considered any comments made by those interested in the application such as consultees with specialist knowledge and nearby residents.

By indicating that the development proposal complies with relevant Local Plan Policies, the planning officer is taking into account the information submitted with the application, any previous relevant applications, any comments received in connection with the application and any other case specific considerations which are material to the decision.

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

The proposal property is a two-storey, terrace dwelling, located on the southern side of Amyand Park Road.

The application site is subject to the following planning constraints:

Article 4 Direction Basements	Article 4 Direction - Basements / Ref: ART4/BASEMENTS / Effective from: 18/04/2018
Conservation Area	CA48 Amyand Park Road Twickenham
Throughflow Catchment Area (Throughflow and Groundwater Policy Zone)	Adopted: October 2020 , Contact: Local Plan Team
Village	Twickenham Village
Ward	Twickenham Riverside Ward

3. RELEVANT PLANNING HISTORY

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

Ref	Proposal	Decision
24/1480/VRC	Variation of planning approval 24/0026/HOT - Condition Number(s): U0175295 Approved Drawings to allow for; altered position of windows within dormer, addition of rooflight to dormer roof and alteration to size of approved rooflight.	Granted Permission
24/P0059/PREAPP	Proposed basement.	Advice Provided
24/0026/HOT	Roof extension, side extension and roof lights to the front roof slope.	Granted Permission

4. CONSULTATIONS CARRIED OUT

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

5 letters of objection have been received. These comments are summarised as follows:

- Concerns regarding stability of the site, and potential impact/structural damage to neighbouring properties.
- The foundations of the properties along the street are fairly shallow.
- Drainage and shared infrastructure.
- Increased pressure on parking if the house were to be enlarged to this extent.
- Traffic, disturbance and noise issues from construction works.
- Previous sink holes in APR and there is currently movement occurring from the works on the pavement.
- Impact on wildlife.
- Impact on conservation area.

1 letter of observation has been received. This comment is summarised as follows:

- Noise levels and vibrations.
- Flooding

Neighbour amenity considerations are assessed under Section 7 in the report below.

5. AMENDMENTS

None.

6. MAIN POLICIES RELEVANT TO THE DECISION

NPPF (2023)

The key chapters applying to the site are:

- 4 - Decision-making
- 12 - Achieving well-designed places
- 14 - Meeting the challenge of climate change, flooding and coastal change
- 16 - Conserving and enhancing the historic environment

These policies can be found at:

https://assets.publishing.service.gov.uk/media/65819679fc07f3000d8d4495/NPPF_December_2023.pdf

London Plan (2021)

The main policies applying to the site are:

- D4 - Delivering good design
- D12 - Fire Safety
- HC1 - Heritage conservation and growth
- G7 - Trees and woodlands
- SI12 - Flood risk management
- SI13 - Sustainable drainage

These policies can be found at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Richmond Local Plan (2018)

The main planning considerations applying to the site and the associated Local Plan policies are:

Issue	Local Plan Policy	Compliance	
Local Character and Design Quality	LP1	Yes	No
Designated Heritage Assets	LP3	Yes	No
Amenity and Living Conditions	LP8	Yes	No
Subterranean Developments and Basements	LP11	Yes	No
Trees, Woodland and Landscape	LP16	Yes	No
Flood Risk and Sustainable Drainage	LP21	Yes	No
Sustainable Travel Choices	LP44	Yes	No
Parking Standards and Servicing	LP45	Yes	No

These policies can be found at

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

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.

Where relevant to the application under consideration, this is addressed in more detail in the assessment below.

Issue	Local Plan Policy	Compliance	
Local Character and Design Quality	LP28	Yes	No
Designated Heritage Assets	LP29	Yes	No
Amenity and Living Conditions	LP46	Yes	No
Basement and Subterranean Developments	LP54	Yes	No
Trees, Woodland and Landscape	LP42	Yes	No
Flood Risk and Sustainable Drainage	LP8	Yes	No
Sustainable Travel Choices	LP47	Yes	No
Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	LP48	Yes	No

These policies can be found at https://www.richmond.gov.uk/draft_local_plan_publication_version

Supplementary Planning Documents

House Extension and External Alterations
Twickenham Village Plan

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:
CA48 Amyand Park Road Twickenham Conservation Area Statement
CA48 Amyand Park Road Twickenham Conservation Area Study
Article 4 Direction Basements
Basement development - Planning Advice Note
Basement Assessment User Guide
Strategic Flood Risk Assessment 2021

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.

7. EXPLANATION OF OFFICER RECOMMENDATION

The key issues for consideration are:

- i Design/Visual Amenity
- ii Neighbour Amenity
- iii Trees
- iv Basement Development
- v Flood Risk
- vi Transport
- vii Biodiversity

Issue i - Design/Visual Amenity

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

Policy 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 original structure, layout, architectural features and materials or reinstatement of heritage assets. Appropriate materials and techniques should be used. There is a requirement to seek to avoid harm or justify for loss and demolition will be resisted. The significance of the asset is taken into consideration when assessing works proposed to a designated heritage asset.

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.

The SPD on House Extensions and External Alterations notes that the doors and windows are an integral part of the house which should be in keeping with its overall style, age and character. Windows are an important feature and an inappropriate choice can spoil an otherwise satisfactory design. The SPD states the following about doors and windows:

- *Full-length glass doors should be avoided.*
- *Windows should maintain existing detail and style with the main windows in the house.*
- *Avoid mixing window styles.*

26 Amyand Park Road is an early 20th century terraced house within the Amyand Park Road Conservation Area (CA48). It is two storeys, in non-original render, under a tiled roof. To the front is a two-storey canted bay window surmounted by a gable with timber detailing. A small oriel window at first floor level sits above the entrance door. To the rear is a two-storey flat roofed outrigger. No.26 forms part of a group of 12 similar houses, forming two terraced with the houses grouped together as pairs. Unsympathetic alterations including the painting/rendering of front elevations, loss of front porches, and installation of unsympathetic windows has diluted both the quality and cohesiveness of the group. Nos 24 and 26 have had their gardens removed and replaced by poor quality hardstanding.

More widely, the significance of the Amyand Park Road Conservation area is defined by its mid-late 19th century character, developed following the arrival of the railway in 1848 and incorporating important historic buildings such as Amyand House and St Marys School.

This application is for the excavation of a basement with a front lightwell, alongside a single-storey side infill extension, alterations to the fenestration on the front and rear elevations, new front entrance door, and addition of a rooflight to the outrigger.

This application follows on from pre-application enquiry 24/P0059/PREAPP and approved application 24/0026/HOT.

Basement

No objections are raised regarding the proposed basement in design terms, which will sit under the footprint of the main house with only a small part extending beyond the main house into the rear garden. This would form a lightwell with walk-on glazing above, to allow for natural light into the rear of the basement. The only other external manifestation of the basement in public views would be the front lightwell, sited immediately adjacent to the host building. This would be covered by a flush horizontal grille to minimise impact. The front lightwell is of an acceptable scale to not appear overly prominent, detract from the original character of the front elevation of the building, or obscure any architectural feature which contributes positively to the character of the building.

The other elements of the proposed works (single storey side/rear infill extension, alterations to fenestration, removal of render and addition of rooflight to outrigger) have previously been approved under 24/0026/HOT. There are no new material planning considerations since the determination of this application which would now justify withholding planning permission. As such the council's comments remain as per the previous case.

Side Infill Extension

The proposal seeks to erect a single-storey side infill extension. The extension comprises a sloped roof, incorporating 3x skylights within. The height of the extension will be sited comfortably below the cill of the first-floor level fenestration, as required under SPD. Given the proposed dimensions in comparison to the existing built form, the extension will not appear overly dominant and will appear subordinate to the original building.

Materials to be used in the exterior works are to be of a similar appearance to those used in the construction of the exterior of the existing house (as stated on drawing number SC23111/AP/BA05), this ensures the development will integrate satisfactorily with the original dwellinghouse. With regard to fenestration, the scheme proposes largely glazed windows/doors across the entire, newly created, rear elevation. The proposed fenestration retains window hierarchy, as outlined in the 'House Extensions and External Alterations' SPD. The contemporary appearance assists in reducing the visual bulk and contributes to helping the extension appear an obvious addition to the main dwellinghouse. No objections are raised with regard to materials.

The amenity space in the rear garden would be reduced as a result of the proposal. However, the reduction will not be significant, when compared to the rear garden area and does not harm local character.

When viewed in the context of the neighbouring additions, it is considered that the proposed development would not harm the character and appearance of the surrounding conservation area. Due to the siting, the works will not form views from the front of the dwelling/street scene, having a neutral impact on the public realm.

Rooflights

No objections are raised regarding the proposed rooflight above the outrigger. It is noted that rooflights have become a common feature in the wider group. The rooflight above the outrigger would be a modest addition, which would be obscured from wider views, and would have a neutral impact on the character and appearance of the Conservation Area. The rooflight will be conditioned to be conservation style and sit flush with the roofing material.

Removal of Render

No objections are raised regarding the proposed removal of the render. The render is a negative feature which detracts from the appearance of the building. The removal would therefore have a positive impact on both the appearance of the building and the wider Conservation Area. The render should be carefully removed to minimise damage to the bricks and repointing should be carried out using lime mortar.

Fenestration

No objections are raised regarding the proposed replacement windows. The existing windows are of an unsympathetic design which detracts from the appearance of the building. Throughout the wider group, there is variation in window design, but the most consistent design is a six-pane upper sash to the front of the bay window, with four-pane upper sashes to the side, and a single-pane lower sash (see nos.36 - 46). This glazing pattern will be replicated at no.26 to restore a greater cohesiveness with the wider group.

The proposed scheme is considered acceptable in terms of design/visual amenity. The proposal is not considered to detrimentally impact the character of the wider conservation area or host building and therefore, is in line with paragraph 205 of the NPPF (2023), as well as the aims and objectives of policies LP1 & LP3 of the Local Plan (2018), these policy objectives are taken forward in publication local plan policies LP28 & LP29 and relevant supplementary planning documents.

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.

The SPD on House Extensions and External Alterations notes that generally an extension of 3m in depth for a terrace property will be acceptable. Where the proposed extension seeks a larger depth, the eaves should be reduced to 2.2m at the shared boundary to mitigate detrimental impact on neighbours such as sense of enclosure or overbearing. However, the final test of acceptability is dependent on the specific circumstances of the site which may justify greater rear projection.

Basement

The below ground siting of the front and rear lightwells ensure the proposal is not visually intrusive, overbearing or creates a sense of enclosure.

The basement development will have a neutral impact upon the amenities of neighbouring occupiers.

It is noted public objections have been received in relation to structural stability, these matters are assessed under 'Issue iv' of this report.

It is also noted public objections have been received in relation to noise and disturbance from construction works. This is not a sustainable reason for refusal, however the requirements of Section 60 of the Control of Pollution Act 1974 is applicable in respect of the minimisation of noise and vibration on construction and demolition sites.

Side Infill Extension

The proposed extension would far exceed 3m in depth, contrary to the guidelines set out in the 'House Extensions and External Alterations' SPD, however, the SPD also states 'Infill extensions are fairly typical around the borough. In such instances, where the depth exceeds that outlined, the eaves height should be limited to 2.2m to mitigate the sense of enclosure'. This scheme proposes an eaves height of 2.2m along the boundary adjoining No.28 and therefore complies with this criterion. It is considered this scheme would not result in any unreasonable adverse neighbouring amenity impacts to this property.

As this element of the proposal is at ground level only the proposal does not raise any issues in terms of loss of privacy.

The proposal would not cause an unreasonable loss of outdoor amenity space, as required under SPD.

Rooflights

The proposed rooflight to the outrigger raises no significant issue in terms of privacy since it is above head height and faces skyward.

Removal of Render

The above works would safeguard neighbour living conditions by virtue of nature.

Fenestration

As there is no significant alteration in the overall size of the openings or glazed areas, the proposal will not result in an increase in overlooking or raise any issues with regard to privacy on any neighbouring properties.

The property would remain solely in residential use as a result of the proposal. An undue increase in noise or pollution would not occur as a result of the proposal.

The proposed scheme is considered acceptable in terms of neighbour amenity. The proposal is not considered to detrimentally impact the amenities of any neighbouring occupiers and therefore, is in line with policy LP8 of the Local Plan (2018), these policy objectives are taken forward in publication local plan policy LP46 and relevant Supplementary Planning Documents/Guidance.

Issue iii - Trees

Policy LP16 of the Local Plan states 'The Council will 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.'

The location of this proposal is sited within the " CA48 Amyand Park Road Twickenham" Conservation Area, which affords trees both within and adjacent to the site of the proposal, statutory protection. However, there are currently no recorded Tree Preservation Orders (TPO) within or adjacent to the site of the proposal.

There are no statutory protected trees within the vicinity of the construction area, thus there is no risk that the incorporation of the proposed development and its construction would materially harm the health or longevity of any statutory protected trees.

The proposed development would accord with Policy LP16 of the Local Plan (2018), these policy objectives are taken forward in publication local plan policy LP42.

Issue iv - Basement Development

Policy LP11 of the Local Plan states 'Proposals for subterranean and basement developments will be required to comply with the following:

1. *extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);*

Complies

2. *Demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.*

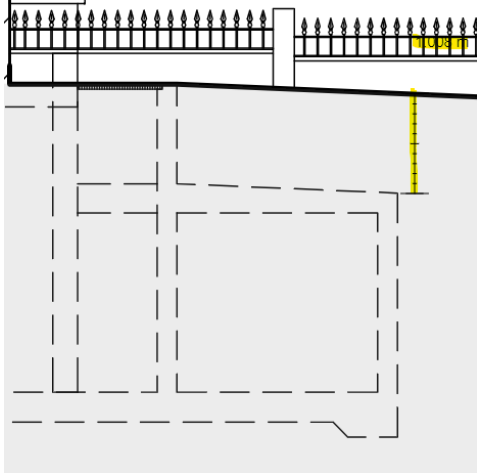
No information has been provided in relation how the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure. Therefore, the proposal is refused on this ground given the conflict with Policy LP11 and also Publication Local Plan policy 54.

3. *use natural ventilation and lighting where habitable accommodation is provided;*

Habitable accommodation is not provided within the basement level. The basement comprises; a plant room, entertainment area, games area and gym area. Notwithstanding this, the scheme includes a lightwell to both the front and rear of the basement to allow for natural light.

4. *include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;*

Complies



As existing the site comprises a concrete driveway, the proposals include removal of this concrete to be replaced with landscaping.

5. *demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with policy LP 21 Flood Risk and Sustainable Drainage;*

Discussed under the 'Flood Risk' Section below.

6. *demonstrate as part of a Construction Management Statement that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with the Local Environmental Impacts, Pollution and Land Contamination policy of this Plan);'*

Discussed under the 'Transport' Section below.

Issue v - Flood Risk

Policy LP21 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.

Policy LP11 of the Local Plan and policy 54 of the Publication Local Plan require schemes for subterranean development to demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond.

Paras 25.57-25.58 of the Publication Local Plan explain that a screening/scoping/Basement Impact

Assessment is required to demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond:

“any sub-surface, basement and cellar proposals within throughflow and groundwater policy zones and/or in an area with $\geq 25\%$ susceptibility to groundwater flooding are required to carry out a site-specific Screen Assessment, which has to be undertaken by a chartered professional, to assess the likely impacts from subterranean development. It should address: the impacts of the proposed subsurface development on the area's subterranean characteristics; land stability; and flood risk and drainage. 2 If the Screening Assessment determines that the proposed subsurface development may have an impact on the local environment, or if it determines that further investigation work is required, then a Basement Impact Assessment is required, which has to be undertaken by a chartered professional. A Site and Assessment Verification Form has to be completed by the chartered professional who undertook the assessment and submitted as part of the application. The Council's Basement Assessment User Guide provides more information and guidance on Screening Assessments and Basement Impact Assessments.”

The latest Strategic Flood Risk Assessment (SFRA) (Sept 2020) defines 'Throughflow Catchment Areas' in the borough where it will need to be demonstrated that basements can be safely developed without increasing throughflow and groundwater related flood risk.

This application site is located within one of the defined Throughflow Catchment Areas.

Section 7.7.2 of this document sets out the following:

A screening assessment needs to be carried out to address the impacts of the proposed subsurface development on the area's subterranean characteristics, land stability, and flood risk and drainage. If the screening assessment determines that the proposed subsurface Strategic Flood Risk Assessment - Level 1 September 2020 London Borough of Richmond upon Thames Version 1.2 vi development may have an impact on the local environment, or if it determines that further investigation work is required, then a basement/cellar impact assessment is required.

The impact assessment, undertaken by a chartered or registered Hydrogeologist, must include the following details:

- a. *Detailed borehole information on or from nearby to the development site, providing results for at least two different points in time. Data recordings should take place within a 12 month period and be at least four months apart. These should identify the geological conditions on or close to the development site, the infiltration potential and the height of any groundwater.*
- b. *If borehole records are found to extend beneath the base of the proposed subsurface structure, basement and cellar designs should include a throughflow/groundwater drainage system. The system needs to reduce the risk of the development flooding neighbouring properties.*
- c. *Details of protective measures for the proposed subsurface development against throughflow and groundwater ingress to the development.*

No FRA has been submitted although different types of flood risk are considered in the submitted 'Basement Impact Assessment (Screening & Scoping) Report, 20 June 2024, prepared by a suitably qualified professional, providing information on, but not limited to; the site, geological setting, hydrogeology, hydrology, flood risk, screening and scoping, preliminary basement impact assessment.

The SFRA states the following information should be provided as part of a basement screening:

- Description of the proposed basement, cellar or surface structure development.
The reports states the proposed development includes “a rear-side extension and creation of basement beneath the entire building footprint and extending partially beneath the front garden.

- Construction methods proposed.

The report states:

- It is recommended that the site is supported by suitably designed temporary support with a basement box construction.
- Alternatively, the excavation should proceed in a manner that maintains the integrity of the ground on all sides.
- If necessary, the works may have to be carried out in stages with the above structure suitably propped and supported.
- Full details of the suitable engineering design of the scheme in addition to an appropriate construction method statement should be submitted by the developer to the local authority.

- Characteristics of the site, including geographical information and topographical information.

The report states:

“A ground investigation is recommended to confirm the ground conditions and groundwater levels (if any) beneath the site. This can then confirm the relative depths of the basement to the groundwater levels.”

- Site borehole information with water levels

Section 3.3 of the report states “as part of the assessment, publicly available BGS borehole records were obtained and reviewed from the surrounding area. The nearest such record was located approximately 132m southeast of the site, from December 1980. This showed the underlying ground conditions to comprise ‘Made Ground’ to a depth of 1.8mbgl, overlaying ‘dark brown silty sandy clay’ to 2.6mbgl (likely representing the Langley Silt Member), overlaying ‘brown slightly clayey, silty sand and gravel’ (likely representing the Kempton Park Gravel Member), to the base of the borehole, at approximately 7.5mbgl.

During the drilling of the borehole groundwater was first struck at 5.2mbgl within the Kempton Park Gravel Member. The borehole is reported to have collapsed at 4.80mbgl.

All depths and measurements should be viewed as approximate, due to the age of the borehole.”

The Basement Assessment User Guide notes that site borehole information should be provided but “*Historical borehole data from sources such as the British Geological Survey may be acceptable to help justify answers provided within the ‘Subterranean Characteristics’ section of the Screening Assessment. If historical borehole data is used, the borehole location must be within 100m of the site and have been conducted within the last 20 years to best capture the current local conditions.*”

The borehole data provided is inadequate to support the BIA assessment on this site given both its age and distance from the site.

- Characteristics of potential impacts & Details of mitigation measures

The report concludes “the creation of a basement for the existing development will not adversely impact the site or its immediate environs, providing measures are taken to protect surrounding land and properties during construction.

The geological and hydrogeological conditions beneath the site should be confirmed by a ground investigation.

The proposed development is not expected to cause significant problems to the subterranean drainage. It would be prudent to confirm this by a ground investigation and subsequently updated Basement Impact Assessment.”

As such, further investigations are required to demonstrate that the proposal would not have significant impacts on flooding, groundwater flow or land stability at the site and immediate surroundings. The applicant has failed to submit sufficient information to confirm compliance with policy relating to London Plan Policy SI 13, the LPAs SFRA, and Local Plan (2018) Policy LP21 and LP11, and Publication Local Plan policies 54 and 8.

Issue vi - Transport

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

Access

The applicant proposes to retain the existing pedestrian access on the southern side of Amyand Park Road (Unclassified road) to the proposed development.

Vehicular Parking

The site has a PTAL of 5 and is in a controlled parking zone ‘D - Central Twickenham’ Times: Monday to Saturday 8:30am to 6:30pm (Bank and Public holidays free). Residents of 26 Amyand Park Road are eligible for Parking permits.

The proposals include the loss of the off-street parking space. Given the property is within a CPZ and has a PTAL score of 5, this is acceptable if the applicant enters into a unilateral undertaking preventing the issuance of any further parking permits for the property. The applicant will also be expected to enter into an agreement with the local highway authority for the reinstatement of the vehicle crossover which will be made redundant by the proposals. These can be secured by Grampian condition.

Basement

Construction Management Plan

The applicant has submitted a construction management plan to accompany the submission. This has been well considered and the applicant has demonstrated they can undertake the construction in an appropriate manner, giving due regard to the needs of users of the public highway.

The applicant proposes that the materials will be delivered to site by numerous subcontractor suppliers. Delivery drivers will park their vehicles next to the hoarding in front of the property prior to offloading materials. Materials will then immediately be transferred into the materials storage area within the boundary of the property.

Materials and plant will be unloaded by driver and site staff, temporary traffic management will be supplied by suitably qualified site staff as required.

To minimise any disruption vehicle deliveries/collections will be restricted to between the hours of 9:30 to 14:30.

Traffic management will always employ as necessary trained banksmen with priority for emergency vehicles. When deliveries are being unloaded to the site we will have banksmen/traffic controllers directing the traffic from both sides of the skip hoarding.

Whilst not a material planning consideration, it should be noted that the applicant will be required to obtain an Approval in Principle (AIP) from a Highway Structures Engineer prior to the commencement of development given the proximity of the works to the highway. The purpose of this approval is to protect and guarantee the structural integrity of the highway during and after the construction of the enlarged basement. Please see the link below for more information: https://www.richmond.gov.uk/services/planning/basement_developments.

Issue vii - Biodiversity

Biodiversity net gain became mandatory for minor developments on applications made from 2nd April 2024. This application is exempt from mandatory biodiversity net gain on the grounds that is a householder application.

Other Matters

Fire Safety

The applicant has submitted a 'Reasonable Exception Statement' to address policy D12 of the London Plan (2021).

The applicant is advised that alterations to existing buildings should comply with the Building Regulations. This permission is NOT a consent under the Building Regulations for which a separate application should be made.

8. 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.

9. 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.

For the reasons set out above, it is considered that the adverse impacts of allowing this planning application would significantly outweigh the benefits, when assessed against the policies in NPPF (2019) and Development Plan, when taken as a whole.

Refuse planning permission for the following reasons

Reason for Refusal - Flood Risk

By reason of its siting within a Throughflow Catchment Area and absence of a satisfactory Basement Screening Assessment (as per the Basement Assessment User Guide), the application has failed to demonstrate that the proposed basement will not increase or otherwise exacerbate flood risk on the site or beyond. The development is thereby contrary to the Richmond Local Plan (2018) in particular Policies LP11 and LP21, the publication Local Plan (Regulation 19 version) policies 54 and 8, the Strategic Flood Risk Assessment (2021), Basement Assessment User Guide (2021) and the aims and objectives of the NPPF (2023).

Reason for Refusal - Structure

It has not been demonstrated that the development of the basement will safeguard the structural stability of the existing building, neighbouring buildings and other infrastructure. Therefore, the proposal fails to comply with Policy LP 11 of the Local Plan (2018) and policy 54 of the Publication Local Plan.

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): KM

Dated: 05.09.2024

I agree the recommendation:

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

South Area Team Manager:ND.....

Dated:05.09.2024.....