

**AVISON  
YOUNG**

# Planning Statement

64 The Green, London, Twickenham TW2 5AG

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**Report title:** Planning Statement

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**Reviewed by:** Matthew Pigott (Associate Director)

**Date:** September 2024

**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

1.1 This Planning Statement has been prepared by Avison Young and is submitted on behalf of Elstree Land Limited ('the applicant') in support of an application at 64 The Green, London, Twickenham, TW2 5AG ('the Site'). The Site is located within the administrative boundary of the London Borough of Richmond Upon Thames ('LBRUT'), who act as the Local Planning Authority ('LPA'). The description of development is:

*"Demolition of existing ancillary structures and erection of two new buildings to provide 2no. self-contained residential accommodate; change of use at ground floor from chiropractor surgery (Use Class E) to residential dwelling (Use Class C3); two storey side extension to provide self-contained residential dwelling; and other associated works."*

1.2 The following documents have been submitted in support of this application:

- Application Form.
- Planning Statement (this document).
- Planning Drawings:
  - Site Location Plan (ref. 012414-ELS-EXISTING-01);
  - Proposed Elevation (ref. 012414-ELS-PROPOSED-E1)
  - Proposed Elevation (ref. 012414-ELS-PROPOSED-E2)
  - Proposed Elevation (ref. 012414-ELS-PROPOSED-E3)
  - Proposed Elevation (ref. 012414-ELS-PROPOSED-E4)
  - Proposed Elevation (ref. 012414-ELS-PROPOSED-E5)
  - Proposed Ground Floor (ref. 012414-ELS-PROPOSED-P1)
  - Proposed First Floor Plan (ref. 012414-ELS-PROPOSED-P2)
  - Proposed Bin Store (ref: 012414-ELS-BS01)
  - Proposed Cycle Store (ref. 012414-ELS-CS01)
- Design and Access Statement, prepared by DHA.

- Heritage Statement, prepared by Cogent Heritage.
- Fire Statement, prepared by BWC.
- Marketing Report, prepared by Haslams
- Structural Report, prepared by Dash.
- Energy and Sustainability Statement, prepared by SRE.
- Transport Statement, prepared by Sands.

1.3 This Planning Statement sets out the planning case for the development and is structured as follows:

- **Section 2** describes the Site and the surrounding area.
- **Section 3** summarises the Site's planning history.
- **Section 4** described the proposed development.
- **Section 5** outlines the pre-application consultation.
- **Section 6** sets out details of the framework of planning policies that should form the basis for determining the Application.
- **Section 7** assesses the Proposed Development against the planning policy framework.
- **Section 8** concludes this Statement.

## 2. Site and Surrounding Area

- 2.1 The Site comprises a two-storey building located on the north side of The Green. The building's lawful use is as a chiropractic health clinic (Use Class E) at ground floor and a single residential (Use Class C3) unit above. The chiropractic clinic has been vacant since November 2021.
- 2.2 To the rear of the main property are two single storey workshops which have operated as a separate planning unit. The workshops have historically been used as storage and distribution space for a stage manufacturing company but are currently vacant.
- 2.3 The Site is a corner plot building adjoining May Road and is directly opposite Twickenham Green.
- 2.4 The Site is located in the Twickenham Green Conservation Area and is a locally designated Building of Townscape Merit (BTM) as are a number of properties in this area which also front Twickenham Green. The Site sits in Area 9 (Twickenham Green) of the Twickenham Village Planning Guidance. It is also an Area of Archaeological Priority (Twickenham and Marble Hill).
- 2.5 Twickenham Green is designated Public Open Space and Other Land of Townscape Importance (OOLTI).
- 2.6 The Site is also in the Twickenham Green Area of Mixed Use and is within the Twickenham Main Centre boundary. There is an Article 4 Direction restricting the change of use from Class E use to Class C3 use within Twickenham main centre.
- 2.7 The Site currently has provision for two parking spaces which are allocated to the clinic. This is located to the front of the unit directly accessed from The Green. The Site has a Public Transport Accessibility Level (PTAL) score of 3 which is considered 'moderate' on a scale of 0 to 6b with 0 being worst and 6b being best. Controlled Parking Zone CPZ WT - West Twickenham is in operation Monday to Saturday 8:30am to 6:30pm (Bank and Public Holidays free).

### 3. Planning History

- 3.1 This section sets out the relevant planning history for the Site. Having undertaken a review of LBRUT's online planning register, the following planning applications are identified as relevant to the proposed development.
- 3.2 Planning permission (ref: 91/2204/FUL) was granted in January 1992 for the following description of development: "Reinstatement of residential use with two front rooms at ground floor level as retail (Use Class A1)."
- 3.3 Subsequently, permission (ref: 91/2270/S192) was granted in February 1992 for "Use as stage scenery manufacturer." This permission related to the rear workshops only.
- 3.4 Finally, permission (ref: 15/3756/FUL) was granted in December 2015 for "Change of use of the current retail shop (Use Class A1) to a therapy centre to provide chiropractic services (Use Class D1)." This permission related to the ground floor commercial unit only.
- 3.5 The above permissions are considered to be the operative permission for the different land uses across the Site.

## 4. Planning Application

4.1 The purpose of this section is to provide an overview of the proposed development for which planning permission is sought.

### Overview

4.2 The Proposed Development represents an opportunity to redevelop the Site to provide four additional homes (Class C3), whilst enhancing the character and heritage of the BTM and Conservation Area. The redevelopment of this sustainable brownfield site is supported by planning policy at all levels and will contribute towards LBRUT’s housing need and bring dilapidated parts of the Site into a viable and sustainable use.

### Amount and Land Uses

4.3 The amount of development is set out in the Design and Access Statement, which is submitted for approval. An overview of the existing and proposed land uses is set out in Table 4.1 below.

**Table 4.1: Land Use Summary**

Land Use	Existing	Proposed
Chiropractor surgery (Use Class E)	89 sqm	0 sqm
Workshops (Class B8)	136.8 sqm	0 sqm
Residential (Use Class C3)	76.1 sqm*	355 sqm*
Homes	1	5

*\*Includes one existing unit*

4.4 The Proposed Development will result in four additional homes on the Site, resulting in a total of five homes (Class C3). The proposed unit mix is set out in table 4.2 below.

**Table 4.2: Proposed Dwelling Mix**

Unit Size Mix		
	1B2P	2B4P
Residential (Use Class C3)	2	3*

Percentage (%) (by unit)	40%	60%*
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*\*Includes one existing unit*

4.5 The breakdown of unit sizes is provided in table 4.3 below:

**Table 4.3: Unit Size**

Unit	Unit Size
The Green, Side Extension	1-bed
64, The Green, Ground Floor	1-bed
Rear workshop	2-bed
Rear workshop #2	2-bed

### **Landscape and Public Realm**

4.6 The Proposed Development includes provision of private rear gardens for each of the dwellings. This includes hard and soft landscaped areas.

4.7 The proposed landscaping will achieve an urban greening factor of 0.064.

### **Access, Parking and Servicing**

4.8 The Proposed Development does not include provision of a dedicated vehicle access.

4.9 Pedestrian and cycle access is provided from May Road and The Green with direct access for each unit.

4.10 Dedicated waste and recycling bins are provided for each unit.

4.11 Dedicated cycle parking will be provided within the garden of each home. Shared visitor parking is provided with the Site’s curtilage on May Road.

### **Energy Strategy**

4.12 The proposed energy strategy incorporates enhanced building fabric to ensure better insulate the building and reduce the operational energy usage. LED lighting will be incorporated throughout the Site as an active energy reduction measure. A dedicated Air Source Heat Pump (ASHP) and photovoltaic (PV) panels are also proposed for each of the homes.



## 5. Pre-Application Consultation

- 5.1 A series of meetings have been held with LBRUT planning officers, which has included written feedback from Design, Conservation, Transport and Environmental officers. Formal meetings with officers took place in February 2022 and February 2024.
- 5.2 Pre-application discussions with LBRUT focussed on the detailed matters including the principle of the loss of the commercial use at the ground floor of the Site and the proposed design of the side extension.
- 5.3 A summary of each of the pre-application meetings is set out below:

### **21/P0295/PREAPP**

- 5.4 A request for pre-application advice was submitted to LBRUT in 2021 in respect of the redevelopment of the Site. The pre-application proposal related to the comprehensive redevelopment of the Site to provide residential and commercial uses. Crucially, these proposals included the demolition of the existing buildings.
- 5.5 Considering the Proposed Development, officers were minded that the principle of demolition of the Site, which is a BTM, was contrary to Policy LP4, in so far as that it would result in an unacceptable impact in heritage terms. In response, this planning application does not include the demolition of the existing building.
- 5.6 Regarding land use, it was noted that Policy S1 of the Local Plan restricted the loss of social infrastructure. It was however noted that following the 2020 update to the Use Class Order, the chiropractic clinic is now classified as Class E. In the absence of any restrictive conditions, operation as any use within Class E could be undertaken without the need for planning permission.
- 5.7 Officers also noted that the acceptability of loss of employment floorspace would also need to be justified in accordance with Policy LP40. Following this, extensive marketing has been undertaken at the Site to find a suitable alternative operator for the property. This is explored in detail in the Assessment section of this Statement below.
- 5.8 Finally, considering the principle of residential use at the Site, Officers welcomed the principle of additional residential dwellings at the Site.

### **23/P0294/PREAPP**

- 5.9 A further meeting was held on 13 February 2024 Officers confirmed that subject to the appropriate marketing evidence, it was accepted that the principle of residential development would be acceptable.

5.10 Detailed design comments were provided in response to the proposed side extension. These have been responded to in turn as described in the Assessment section of this Statement. It was noted that consideration should be given to the preservation or enhancement of the existing building as a heritage asset. On that basis, a specialist heritage consultant, Cogent, has been instructed to help guide the proposed development.

## 6. Planning Policy Framework

6.1 The proposed development has been prepared in the context of relevant policy and guidance at the national, regional, and local levels. This section of the Planning Statement sets out the policy framework against which the scheme is subsequently assessed.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the adopted Development Plan, unless material considerations indicate otherwise. The Development Plan for the Site comprises the following:

- The London Plan (2021)
- LBRUT Local Plan (2018)

6.3 The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) set out the national approach to Planning Policy. They do not form part of the Development Plan but should be considered material in the determination of all planning applications.

### **National Planning Policy Framework (2023)**

6.4 The NPPF published by the Government, was last updated on 19<sup>th</sup> December 2023, and sets out the Government's national policy for planning issues in a single, comprehensive document.

6.5 The NPPF is a material consideration in the determination of planning applications. It sets out the government's overarching planning policies for England and how they are to be applied. The core message of the NPPF is a 'presumption in favour of sustainable development'.

6.6 A revised draft NPPF was published on 30 July 2024. The Ministry of Housing, Communities and Local Government are undertaking a consultation on the revised document. The consultation will run until 24 September 2024.

### **The London Plan (2021)**

6.7 The London Plan 2021 was adopted in March 2021 and provides the Spatial Development Strategy for Greater London. The London Plan sets out the principles of 'good growth' and policies to promote London's global economic role and to ensure that success is shared amongst all Londoners. Key policy principles include planning for sufficient employment, including workspace for a range of types of occupiers and ensuring new development is sustainable.

## **Local Plan (2018)**

6.8 The LBRUT adopted their Local Plan in July 2018. It supersedes all previous local planning policy.

6.9 As guided by the Local Plan, the Site is subject to the following planning policy designations:

- Area of Mixed Use (Policy LP25)
- Takeaway Management Area (Policy LP 30)
- Twickenham Green conservation Area (Policy LP 3)
- Building of Townscape Merit
- Twickenham Green Village
- Critical Drainage Area

6.10 LBRUT is currently undertaking a review of the Local Plan. The Publication Local Plan was submitted to the Secretary of State on 19 January 2024. In accordance with Paragraph 48 of the NPPF, policies within the draft Local Plan are still considered to be at the early stage of preparation and therefore are only afforded very limited weight in the determination process.

6.11 LBRUT has also adopted a number of Supplementary Planning Documents and Guidance (SPD/G). SPDs provide additional guidance on the interpretation of planning policy. These are also material considerations in the determination of a planning application. The following SPDs are of relevance to these proposals:

- Affordable Housing SPD
- Buildings of Townscape Merit SPD (2015)
- Design Quality SPD (2006)
- House Extensions and External Alterations SPD (2015)
- Residential Development Standards SPD (2010)
- Optional Technical Standards Update (2015)
- Small and Medium Housing Sites SPD (2006)

## 7. Planning Assessment

7.1 This section provides an assessment of the proposed development against the planning policies summarised above. The key considerations in assessing the proposed planning application are: Principle of Development, Design, Heritage, Residential Standards, Transport, Energy and Sustainability, and Flood Risk.

### **Principle of Development**

#### Loss of Employment Floorspace and Social Infrastructure

- 7.2 Local Plan Policy LP 28 Part C states that the loss of social or community infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly that there is no longer an identified need for the facilities, or they no longer meet the needs of the users. The potential for re-use of a site as community floorspace should be evidenced through appropriate marketing evidence for a period of at least two consecutive years.
- 7.3 Part D states that where the Council is satisfied that the evidence has been provided and the change of use from social/community infrastructure has been justified, redevelopment for other employment generating uses or affordable housing should be considered.
- 7.4 Local Plan Policy LP 40 resists the loss of employment floorspace. Local Plan Policy 41, which governs office floorspace states that any loss of office floorspace will only be permitted where robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an office-based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of two continuous years. In addition to the marketing, a sequential approach to any change of use should be considered. This sets out as follows:
- a) Redevelopment for alternative employment uses including social or community infrastructure uses; followed by
  - b) Mixed use including other employment generating or community uses and residential which maximises the amount of affordable housing provided as part of the mix; followed by
  - c) Residential with maximum provision of affordable housing in accordance with policy LP 36 Affordable Housing.
- 7.5 The Site has historically been used as a chiropractic health clinic under Use Class D1. Following updates to the Use Class Order in 2020, this use was reclassified as Class E, commercial, business and services.

- 7.6 The previous tenant vacated the Site in November 2021.
- 7.7 A detailed marketing report has been submitted with this application. It describes the continuous marketing of the full extent of the Site between 16 May 2022 – 12 July 2024 (26-month period).
- 7.8 The Site was marketed for Class E use, broadly covering all viable commercial and employment generating uses.
- 7.9 The marketing generated little interest in the property which resulted in a limited number of viewings. No reasonable offers were received showing demonstrating the lack of interest in the Site. The general feedback from prospective tenants was that the building needed significant expense to become tenantable, so alternative opportunities were explored.
- 7.10 In accordance with the sequential approach described in Policy 40, no suitable social/ community or employment tenants were identified. Marketing evidence has been provided in relation to both the social and community use and office use as required by policies LP40 and LP41 Accordingly, the loss of the existing use complies with policy and is acceptable.

#### Residential Development

- 7.11 Policy LP 34 sets out the Council's target to deliver 3,150 homes between 2015 and 2025. This includes provision of approximately 1,000 units within Twickenham. The supporting text to the policy describes that the housing need will be met from housing development from all sources, including small sites, conversions and remodelling.
- 7.12 Subject to compliance with other policies within the Local Plan, Policy LP 34 sets a presumption in favour of residential development. This Statement has demonstrated above that the loss of the existing uses complies with planning policy and therefore the principle of residential development is acceptable.

#### Affordable Housing

- 7.13 Policy LP 36 describes the Council's approach to affordable housing. It sets out that the Council will expect 50% of all housing to be affordable. On sites that are below the threshold of 'capable of 10 or more gross units' and therefore cannot accommodate onsite affordable housing, a contribution to offsite affordable housing will be required. This should have regard to economic viability, site costs, availability of public subsidy and mix and planning benefits.
- 7.14 The Proposed Development seeks provision of four additional (five total) residential dwellings on Site. It is therefore not considered capable of accommodating any onsite affordable housing. The applicant

would therefore seek to agree an offsite financial contribution in respect of affordable housing with the Planning Authority through an appropriate mechanism. The proposal would therefore comply with Policy LP36.

7.15 On the basis of the above, it has been demonstrated that the sequential approach has been followed in considering the appropriate land use at the Site. Indeed, appropriate marketing has been undertaken, which demonstrates that the Site is no longer suitable for community or employment uses. In accordance with Policy LP 36, the site is not required to provide any on site affordable housing. Therefore, the proposed market housing is considered to be acceptable.

## **Design**

7.16 Local Plan Policy LP 1 (Local Character and Design Quality) Part A states that the Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. 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.

7.17 Local Plan Policy LP 2 (Building Heights) adds that the Council will the Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights.

7.18 The principle of infill and backland development is considered under Policy LP 39. It stipulates that all infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours.

7.19 In considering the acceptability of infill development, the following factors must be addressed:

- 1 retain plots of sufficient width for adequate separation between dwellings;
- 2 retain similar spacing between new buildings to any established spacing;
- 3 retain appropriate garden space for adjacent dwellings;
- 4 respect the local context, in accordance with policy LP 2 Building Heights;
- 5 enhance the street frontage (where applicable) taking account of local character;
- 6 incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 local Character and Design Quality;

- 7 retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;
- 8 result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;
- 9 provide adequate servicing, recycling and refuse storage as well as cycle parking;
- 10 result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.

7.20 Further guidance is set out in LBRUT's adopted SPDs.

7.21 The House Extensions and External Alterations SPD describes 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." In achieving this, where an extension is designed to appear as an obvious extension, it should be made subordinate to the main structure. This can be demonstrated through lower ridge heights. Side extensions should also avoid projecting beyond the existing front elevation and should not infill gaps between neighbouring buildings. Finally, the SPD notes that extensions should not be more than half the width of the original building.

7.22 The Small and Medium Housing Sites SPD considers new residential development in established residential areas. It identifies the key components which constitute 'character' as: street proportion; plot, layout and grouping; building line; frontage composition; roofline; materials; and, landscape. These components should each be considered for development. This approach is broadly echoed by Design Quality SPD.

7.23 The Proposed Development includes the erection of a two-storey side extension to provide a self-contained residential dwelling, and redevelopment of the existing rear workshops to provide two, two storey homes. These elements are considered in turn below.

#### Side Extension

7.24 The proposed extension is finished in white painted brick with simple arched brick headers and stone cills. Windows will be white-framed sash windows, which are found on the BTM and common locally. Simple flat roof timber porches are proposed for both the extension and the first-floor apartment of the BTM.

7.25 During pre-application discussions, the proposed extension was considered by LBRUT to fail to be subservient to the existing building, by virtue that it exceeded more than half the width of the existing building and was similar in height. The Proposed Development responds to these comments by



reducing the overall scale of development including a reduction in width to half of the existing building and a reduction in the height of the building.

- 7.26 The proposed extension is demonstrated to reflect the existing character and appearance of the Site, whilst being a clear subservient addition. The design has therefore responded to the planning policy and SPD guidance and is considered to be an appropriate design.

### Rear Dwellings

- 7.27 As described in the accompanying Structural Report, the existing rear workshops are clearly shown to be in an unsuitable condition. Indeed, there is clear evidence of cracking and movement in the structure that would make their continued use dangerous. In lieu of any commercial use on Site, it is therefore proposed to replace these structures with two storey homes.
- 7.28 The proposed homes have been designed to respond to the established character of the development along May Road. As described in the accompanying Design and Access Statement, the character along May Road comprises two storey mews style cottages with varied roofscapes. This character has been immediately replicated at the Site creating a singular streetscape.
- 7.29 The proposed material palette is white brick façade with sand clay roof tiles. This approach is replicated along May Road with varied coloured bricks.
- 7.30 Subtle inconsistencies in the existing streetscape, such as porches and window design have also been proposed to avoid a uniform approach, as per the existing arrangement.
- 7.31 The above demonstrates that the Proposed Development has responded to the pre-application feedback in conjunction with the planning policy and supporting guidance documents. The general approach is considered to be sympathetic to the existing streetscape and local character. The Proposed Development is therefore considered to be in accordance with Policy LP 39.

### **Heritage**

- 7.32 The Site is a non-designated heritage asset, as a BTM which contributes positively to the designated Conservation Area.
- 7.33 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character of that area.

- 7.34 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposals would cause to the significance of the heritage asset.
- 7.35 Paragraph 192 of the NPPF states that in determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.36 Paragraph 196 of the 'NPPF' states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposals.
- 7.37 Paragraph 200 of the NPPF states that 'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 7.38 Paragraph 201 of the NPPF states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposals, where appropriate, securing its optimum viable use.
- 7.39 Considering the impact on the heritage assets, Policy LP 3 Part A states that the Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Part C governs development in the Conservation Area and adds that all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.
- 7.40 Local Plan Policy LP 4 requires development to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including BTMs.

- 7.41 A Heritage Statement has been prepared by Cogent Heritage and accompanies this application. The Statement considers the architectural interest of the building is derived from its positioning as one of the earliest structures within the setting of The Green. Indeed, the building is described to date back to at least 1825. The Conservation Area appraisal notes the effect, that the Green is “anchored by prominent buildings on each corner”.
- 7.42 The Conservation Area Appraisal adds further that the Conservation Area benefits from a diverse range of buildings with varied facades, materials and roofscapes. These features add varied interest to the Conservation Area.
- 7.43 The Heritage Statement goes on to note that the workshops to the rear of the Site were added in the mid-19<sup>th</sup> century and do not contribute to the building’s designation.
- 7.44 Considering the impact of the Proposed Development, in appraising the works to the main building, the Heritage Statement summarises that the modifications to the building are relatively minor, and largely positive. The removal of the advertisement on the eastern return elevation would be a notable and highly visible improvement, and there would be no harm in removing the non-original shopfront, given the generally domestic design and appearance of the building. The deeply setback side entrance door, which would be overlapped by the extension would be replaced with a new side entrance. Together with the new front garden here, in place of the present car parking, this would be an enhancement.
- 7.45 The proposed side extension is considered to balance a subservience of the existing building whilst creating a stepped transition with the Site’s neighbouring buildings to the west.
- 7.46 The extension has been designed with traditional forms, proportions and materials reflecting the established BTM.
- 7.47 Considering the impact on the heritage assets, the Heritage Statement considers this would add to the ‘diverse collection’ of ‘higher density’ buildings, add to the ‘varied facades, materials, and roofscape’ and ‘add interest’ as well as ‘demonstrating the changing nature of the area’.
- 7.48 In addition, the replacement of the existing car parking area with a curated front garden would add a visual interest to the Site.
- 7.49 Considering the works to the rear of the Site, May Road is noted in the Appraisal to be comprised of mid-late C19 cottages on narrow plots. The Heritage Statement describes that when considered against the largely modern and unremarkable existing buildings, there would be no harm due to the change on May Road, and arguably a good deal of enhancement.

7.50 On balance, when considered individually and as a whole, the Heritage Statement considers the effect of the development would enhance or conserve the character of both the BTM and Conservation Area. The Proposed Development would therefore be in accordance with the NPPF and Local planning policies.

### **Residential Standards**

7.51 LP 35 states that development should generally provide family sized accommodation, except within the five main centres and areas of mixed use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location.

7.52 The Proposed Development would provide two one-bed dwellings and two two-bed dwellings. The Site is located in Twickenham, which forms one of the five main centres. Therefore, a more balanced approach to the housing mix should be applied. The proposed housing mix is considered to be in keeping with the surrounding context which comprises two storey buildings. Therefore, the proposed mix is considered to be suitable.

7.53 Part B of the Policy requires that all new homes comply with the Nationally Described Space Standards. The proposed dwellings all exceed the minimum standards and therefore comply.

7.54 Part C of the Policy requires all development to provide external amenity space. Part D adds that this should be useable; accessible; orientated for sunlight and shading; and sufficient size to meet the number of occupants. Each home within the Proposed Development includes provision of dedicated private amenity space. This is located to the rear of each property and will benefit from good levels of daylight and sunlight.

7.55 Finally, part E of the policy requires 90% of all buildings to meet the requirements of M4(2) and 10% to meet M4(3) requirements. The proposal provides 100% wheelchair adaptable homes, and is therefore acceptable.

7.56 Taking into account the above, the proposed development complies with the requirements of Policy LP35.

### **Amenity**

7.57 Policy LP8 (Amenity and Living Conditions) of the Local Plan states that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.

- 7.58 The Proposed Development has been designed to step back from the boundary line to the west. It is also noted that the facing elevation at 70, The Green does not include any windows. Taking this into account, there is no risk of overlooking. This consideration was agreed during pre-application discussions.
- 7.59 Due to the residential nature of the Proposed Development would not increase the risk of noise or odour impacts.
- 7.60 On this basis, we consider that the Proposed Development would accord with Policy LP8.

## **Transport**

- 7.61 Local Plan Policy LP44 (Sustainable Travel Choices) states that the Council will work in partnership 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.
- 7.62 Policy LP45 (Parking Standards and Servicing) states that 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 local environment, and ensuring making the best use of land. It adds that front garden car parking would be resisted unless it can be demonstrated that there would be no impact on pedestrian safety, and that there would be no harm to the character of the surrounding area.
- 7.63 A Transport Statement has been prepared by Sands and accompanies this application. As described within the Transport Statement and Design and Access Statement, the Proposed Development provides a total of 11 long-stay and two short-stay cycle parking spaces. this quantum is in accordance with London Plan standards.
- 7.64 Dedicated secure cycle parking is provided for each dwelling, either within rear or front gardens. This is in the form is secure cycle sheds. Visitor parking is provided on May Road within a private garden space.
- 7.65 Based on census data, the Transport Statement sets out that the Proposed Development would generate a need for three cars.

- 7.66 The Proposed Development results in the loss of car parking to the front of the Site. As discussed above, the loss of the parking area will provide a visual improvement to the character of the BTM and Conservation Area, and is therefore considered to be a benefit of the development.
- 7.67 The Proposed Development does not provide any on-site car parking. As part of the Transport Statement, a local parking survey has been undertaken within the surrounding streets. This demonstrates that 23% of spaces within the LPZ are generally available. Therefore, the level of stress is considered to be below the threshold where an additional three parking spaces would be impactful. On this basis, the proposed loss of off-street parking is considered to be acceptable.
- 7.68 In considering the above, the Proposed Development is considered to be in accordance with Policies LP44 and LP45.

## **Energy and Sustainability**

- 7.69 London Plan Policy SI 2 requires major development to reduce greenhouse gas emissions in operation by following the energy hierarchy:
- 1 be lean: use less energy and manage demand during operation
  - 2 be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - 3 be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - 4 be seen: monitor, verify and report on energy performance.
- 7.70 Policy LP20 requires that the Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property. The Policy goes on to state that new development should minimise the effects of overheating as well as energy consumption in accordance with LBRUT's cooling hierarchy.
- 1 minimise internal heat generation through energy efficient design
  - 2 reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls
  - 3 manage the heat within the building through exposed internal thermal mass and high ceilings
  - 4 passive ventilation
  - 5 mechanical ventilation

6 active cooling systems (ensuring they are the lowest carbon options).

- 7.71 Whilst the Proposed Development does not meet the threshold for 'major development', the Applicant has followed best practice, and design the Proposed Development in accordance with the mayor's energy hierarchy. This approach sets out a more stringent regulation than the LBRUT Local Plan.
- 7.72 The detailed approach to the Energy Strategy is set out in the accompanying Energy and Sustainability Statement, prepared by SRE. A summary has been provided below:

Be Lean

- 7.73 Passive design measures have been incorporated into the Proposed Development. This includes designing the building with an orientation to achieve the maximum solar gain. All glazed areas of the development will also benefit from natural ventilation through openable windows and have shading through blinds and curtains.
- 7.74 The development will also utilise traditional construction methods and building materials with low infiltration rate. This will ensure an airtight building.
- 7.75 Incorporating active energy reduction measures, the Proposed Development will utilise 100% low level energy light emitting diode (LED) lighting.
- 7.76 An energy neutral wastewater heat recovery system has been installed in each dwelling to utilise waste across the Site.
- 7.77 The above also demonstrates compliance with the Council's energy hierarchy, using opportunities to reduce heat generation and promote energy efficiency, whilst including mechanical ventilation.

Be Clean

- 7.78 The Site does not benefit from access to any existing or proposed district heat networks. Therefore, no 'be clean' improvement could be provided.

Be Green

- 7.79 The Proposed Development incorporates the use of Green technologies such as PV panels and ASHPs for each dwelling.

7.80 Be Seen

- 7.81 The Proposed Development will include provision of smart meters to monitor energy use and ensure efficiency.

- 7.82 Taking the above into account, the Proposed Development will achieve an overall 78.81% improvement on the baseline CO2 emission per year. The development is therefore shown to be in accordance with Policy LP20 of the Local Plan.

**Flood Risk**

- 7.83 Policy LP 21 requires 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.

- 7.84 The application Site is located within Flood Zone 1. The Site is therefore considered to be at low risk of flooding.
- 7.85 The Proposed Development will broadly replace the existing buildings with buildings of a similar footprint. The additional landscaping will provide opportunity for additional permeable surfaces to assist with drainage. On that basis, we consider that the Proposed Development would accord with Policy LP21.



## 8. Conclusion

- 8.1 This Planning Statement has been prepared by Avison Young on behalf of the Elstree Land to support the redevelopment of the Site to provide four additional dwellings. The development has been design to provide new homes to the highest possible standard, whilst respecting the overall heritage setting in which the Site is located.
- 8.2 This Statement and accompanying suite of supporting technical appraisals demonstrates that the Proposed Development would be sustainable development and would accord with the adopted Development Plan policies, providing necessary residential development. On that basis, the application should be approved without delay.

# Contact details

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