

Planning Statement – Sevenoaks, 101A High Street, Hampton



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1. Introduction

- 1.1. A planning application has been submitted to Richmond Council in respect of our client's proposal for the demolition of Sevenoaks house and outbuildings, and replacement with a contemporary dwelling of exceptional quality and sustainability alongside associated works including driveway alterations and landscaping.
- 1.2. The dwelling was built in the 1950s and is not of excellent design or quality. It has been substantially extended, altered and remodelled both externally and internally over the years which has resulted in a poor-quality building architecturally. The modern outbuildings in the garden are also of a poor quality and detract from the setting of the house, conservation area and adjacent listed building.
- 1.3. The proposals therefore seek to reintroduce a beautifully designed, contemporary family dwelling, as well as enhancements to the grounds and setting of the house. The proposals will reduce the height of built development and improve the landscape character of the site and setting of the adjacent listed building and wider conservation area. The new dwelling aims to achieve the highest level of sustainability achieving net zero regulated operational energy. The application proposals will result in a replacement building that is superior in terms of design, build quality, materials, sustainability and functionality.
- 1.4. The proposals consist of the following works:
 - Demolition of the existing mid-20th century and subsequently altered dwelling
 - Demolition of existing outbuildings
 - Introduction of a new dwelling of a low-slung contemporary design (see DAS for full details)
 - Provision of green roofs and new landscaping and tree planting
 - Retention of existing brick boundary wall to the rear garden
 - Modifying the driveway in relation to fire safety and to allow access for emergency services.
- 1.5. The application is submitted following constructive pre-application discussions with Richmond Council in June 2024 (Ref 24/P0106/PREAPP), where it was stated that 'subject to further detail, the principle of demolition could be established. There is no evidence that the building has been considered to contribute to the character, appearance or significance of the Conservation Area or adjacent listed building. Should the above be achievable, there is no in principle objection to a house in this location given there is one on site already and the large size and mid-block location provide opportunities for a sensitively designed dwellinghouse'.
- 1.6. This Statement should be read in conjunction with the architectural drawings and reports submitted alongside this application.
- 1.7. Subsequent sections of this Statement are as follows:
 - Section 2 provides a description of the site and surrounding area;
 - Section 3 summarises the relevant planning history;
 - Section 4 describes the proposals;
 - Section 5 provides a summary of the planning policy context;
 - · Section 6 outlines the justification for the proposed development in planning terms; and
 - Finally, Section 7 summarises the key issues and overall conclusions.
- 1.8. The Statement demonstrates that the proposals comply with the relevant development plan policies, the NPPF, Richmond's Supplementary Planning Documents and other relevant documents and guidance.

2. Site Context and Planning History

Site Context

- 2.1. The property is an arts and crafts style two and a half storey, detached dwelling. It is set back from the High Street accessed by a long driveway.
- 2.2. The evolution of the building can be summarised as below -
 - The original core structure was built in the 1950s;
 - It was extended at ground and first floor in 1986;
 - In 2005 there was the erection of two storey side extension with garage/utility room; and
 - In 2008 the conservatory was built and roof extension incorporated.
- 2.3. The plot is generous with a large front and rear garden, as well as a drive leading in from the High Street. It benefits from good levels of privacy to the rear, through its large brick boundary walls, but there is good intervisibility between the front of the site and the listed Elm Grove Lodge, which separates the site from the High Street.
- 2.4. There is a Group TPO near the entrance of the site (Reference: T0012). All the rest of the trees are also protected as a result of the property being in a Conservation Area.
- 2.5. The site is located within Flood Zone 1 (low risk of flooding) but is in an area susceptible to ground and surface water flooding.
- 2.6. The property is not listed or locally listed, but it is within the Hampton Village Conservation Area and is adjacent to Elmgrove House (101) (Grade II). The site falls within the wider setting of 81 High Street (Grade II) and 110 High Street (Grade II). Bushy Park (Grade I) is a Registered Park and Garden located further to the east. There are several Buildings of Townscape Merit (Non-Designated Heritage Assets) in the immediate surrounds, including 85 High Street and 112 -124 High Street.
- 2.7. The site has a PTAL level of 2 but is well connected by bus. It is 2 km to Hampton and 5km to Kingston.
- 2.8. There are a variety of shops and services adjacent along the high street and green spaces including Bushey Park which is only a 15-minute walk.

Site Planning History

- 2.9. The relevant site planning history is set out below -
 - 20/2149/VRC Variation of condition 2 approved drawings of planning permission 17/2623/HOT allowed on appeal for (New Porch and Dormers to front and rear) to allow conservation rooflight to be re-positioned from the side roof to rear roof Granted Permission 19/11/2020.
 - 17/2623/HOT New porch to front. New dormers to front and rear Refused Permission 04/09/2017. Appeal Allowed on 10/01/2018.
- 2.10. The application was refused as a result of the effect of the proposed development on the character and appearance of the dwelling. The Inspector disagreed and did not consider it would cause harm to the character and appearance of the host dwelling.
 - 17/1279/HOT New porch to front, the raising of the side roof and new front and rear dormers Refused Permission 26/05/2017.
- 2.11. The application was refused because it was considered the proposed development, including the raising of the side roof, front dormer, rear dormers and alterations to the porch, by reason of its siting, design, height, width, bulk, mass and scale would result in a visually intrusive, unsympathetic, incongruous and overbearing form of development that fails to harmonise with the appearance of the host dwelling destroying the appearance, form and proportion of the host dwelling.
 - 08/3174/CAC Demolition of existing single storey rear extension and conservatory Granted Permission 14/11/2008

• 08/3173/HOT - Erection of single storey timber framed orangery and replacement of existing doors - Granted Permission 14/11/2008.

The Officer considered that given the back land nature of the site, the property and proposed addition would not be visible from public viewpoints so will not impact on the street scene. The scheme is not considered to harm the character and appearance of the surrounding Conservation Area. It was considered the proposed scheme would at least preserve the character and appearance of the Conservation Area.

- 05/0291/HOT Erection of two storey side extension with garage/utility room Approved 19/05/2005.
- 03/0233/FUL and 03/3153/FUL Demolition of existing building and erection of detached building of 9 x 2 bedroom apartments and provision of 12 parking spaces Withdrawn 15/12/2003. Reasons unknown.
- 01/1776 and 01/1777 Demolition of existing dwelling Withdrawn 19/12/2001. Reasons unknown.86/0682 Erection of first floor extension, ground floor extension and detached double garage and storeroom Granted Permission 17/09/1986.
- 66/0974 Demolition of existing house and erection of a part two, part three storey block of 16 flats with 16 lock-up garages and 4 parking spaces Refused Permission 12/08/1966. The application was refused for the following reasons
 - 1. The proposed layout is unsatisfactory, and the flats sited in such close proximity to the boundary fences as to result in a cramped form of development.
 - 2. The proposal constitutes an undesirable and unneighbourly form of backland development which would result in overlooking and loss of privacy to adjoining properties.
 - 3. The proposed access road would be inadequate by reason of width and sight lines to the Metropolitan Road and the resulting condition along the relevant portion of High Street which would prejudice the free flow of traffic and general safety.
 - 4. The proposed density, having regard to the particular shape of the site would be excessive.
 - 5. The increased use of the access drive and the provision of all parking facilities immediately adjacent the northern boundary would be likely to prove prejudicial to the amenities of adjoining residents.
- 2.12. There have also been a substantial number of tree applications over the years at the site.

Relevant Site History

- 2.13. There have been a number of knock down rebuild proposals submitted in Richmond. Some noteworthy applications are set out below-
 - 23/2841/FUL 108 Stanley Road Teddington TW11 8TX Demolition of the existing detached dwelling and erection of a pair of semi- detached dwellings, with associated parking, landscaping cycle and refuse enclosures Approved 9 July 2024 but no comments made on the appropriateness of demolition.
 - 24/0353/FUL 92 Boileau Road, Barnes Demolition of existing dwelling and construction of replacement dwelling and associated site works - Approved 02 May 2024. The Officer Report noted -

"Examining the 60-year lifespan aids in comprehending the cumulative emissions during construction and over the lifespan of the house. The intersection point of these lines signifies the tipping point at which a new build becomes viable in terms of carbon emissions. Due to the energy efficiency and sustainability credentials of the Proposed, it becomes a more appealing option than both the Existing and Extended option from a carbon perspective within 10 years. Even when factoring in the embodied carbon of the existing house, the Proposed surpasses both the Existing and Extended option from a carbon perspective after approximately 25 years, well within the Proposed lifespan.

Despite starting from a higher emissions point, the Proposed reaches its tipping point in approximately 8 years, leading to around 52 years of significantly lower emissions compared to the Existing. While the Extended option may offer improved energy efficiency over the Existing, it is evident that it is substantially less appealing than the Proposed...

...Therefore, the loss of the existing property is considered to have been justified and is in accordance with the relevant policy requirements'

23/2663/FUL - 23A Hampton Road Teddington TW11 0JN - Demolition of existing bungalow and the erection of a three-storey replacement dwelling with basement level – Refused on 12 February 2024 by virtue of its inappropriate design, proportions, scale, massing and choice of materials, and impact on residential amenity. No comments made on the appropriateness of demolition and instead the Officer Report stated this –

'Chapter 7 of the submitted Energy Statement assesses the impact of the replacement of an existing dwelling with a new construction in terms of embodied carbon. Over a 60 year period it is calculated that this would result in a C02 reduction of 257,931kg/C02. This shows that the replacement dwelling does achieve a carbon payback across the 60 year design life of the building. This would be considered to overcome point a) of LP38, and points b) and c) will be discussed in further detail later in this report as they relate to other policies.'

- 23/2637/FUL 77 Broad Lane Hampton TW12 3BE The demolition of the existing 3-bedroom dwellinghouse and garage with
 the erection of a replacement 6-bedroom dwellinghouse and garage Refused 2 February 2024 due to transport, design and
 neighbour amenity considerations. No comments made on the appropriateness of demolition and the Officer Report stated that
 a Carbon Report has been submitted, to illustrate justification for the removal of the existing dwelling in accordance with the above
 policy requirement.
- 23/2490/FUL 84A Hampton Road Twickenham TW2 5QS- Demolition of Existing Bungalow and the Erection of a Replacement Dwelling Approved 2 January 2024. The Officer Report provides no explanation of how the proposal would comply with Policy LP38. Instead, it notes that a demolition statement has been submitted with the application. This specifies that the new build would also allow the house to be constructed to reduce energy demand and carbon dioxide emissions. The carbon dioxide emissions (DER) based on the installation of an air source heat pumps and the installation of a photovoltaic array of 4.0 kW are assessed as 144 kg CO2 per year. This equates to a reduction of 1,602 kg CO2 per year or 91.75% of the total TER emissions.
- 23/1812/FUL 14 Cedar Heights, Petersham Demolition of existing dwelling and erection of a replacement two storey dwelling
 Approved 07 September 2023.

The Officer Report stated -

'A Carbon Lifecycle Statement has been submitted to the council – received on 12/07/2023. The assessment states that the existing four-bedroom dwelling has very low environmental credentials but with the potential to be improved. The EPC report states a worse than UK average of Energy Class E and it has a very high energy use rate in its current form. The proposed scheme looks to provide a house with elements built to a higher standard. The predicted proposed EPC considers an Energy Class of A and a low energy use rate.

The report outlines that operational energy is the energy use of each building in operation (i.e. heating or electricity). Embodied carbon is the CO2 of the existing building elements and what will be emitted in the building of any proposed works. Whole life cycle carbon is a comparison balancing both operational energy and embodied carbon to understand tipping point of viability, usually in set time periods.

In relation to operational energy, an improved dwelling would achieve 41.81% over the existing, whereas the proposed dwelling would achieve an 80.17% improvement over the existing. It is also noted that the proposed building does not include any energy generation and still provides a 65.92% improvement on CO2 over the improved scheme. The emissions of the proposed scheme could be improved further by the addition of PV panels.

In relation of embodied carbon, it is shown much higher when building a new building, as seen from this proposal where you can see over double the existing carbon presumed in the existing house. The extended and improved scheme would also provide a large increase. Therefore, when viewed in isolation, neither scheme is justifiable.

In relation to the whole life carbon, an improved dwelling would achieve a 9% reduction over the existing, whereas the proposed dwelling would achieve a 65.80% reduction over the existing. The proposed scheme provides a reduction in carbon emissions over both the existing and improved house. The report states that the argument for replacing the existing building with an innovative modern dwelling would be considered justifiable and the proposed design is low enough in emissions to replace the existing building nearly three times over.'

It is therefore considered that the loss of the existing dwelling has been sufficiently justified and the proposals therefore comply with Policy LP38'.

 21/1100/FUL- 15 Orchard Rise, Richmond, TW10 5BX - Demolition of dwelling and replacement with a new single family dwelling house - Approved 18 Feb 2022. The Officer Report noted -

'The proposal is to demolish and replace the existing detached family dwelling. As per Local Plan Policy LP38, it is preferable that existing housing is retained in the Borough unless it can be demonstrated under certain circumstances that redevelopment is justified.

In this circumstance the proposal is located within a Conservation Area. The building in isolation is not of great significance, however it is noted that in unity, the buildings within this conservation establish a character distinguished by the survival of a good quality planned residential estate dating between 1925 and 1932.

The proposed design seeks to mimic the existing, including all the alterations which were approved under applications 21/0857/HOT and 21/1482/HOT. It is therefore considered that the proposed design would have a neutral impact on the conservation area.

The applicant also submitted a Sustainable Construction Assessment, which outlines 2 x scenarios for sustainability outcomes over a 60 year lifecycle. The report concludes that the proposals to redevelop the site would be much more sustainable in the future in comparison to refurbishing the property. As such, it is considered that Local plan Policy LP38 is satisfied and the proposed redevelopment is justified.'

3. Pre-Application Feedback

- 3.1. The application is submitted following constructive pre-application discussions with Richmond Council in June 2024 (Ref 24/P0106/PREAPP).
- 3.2. A summary of the pre-application feedback and how we have responded can be found in the following table.

Matter	Pre-application feedback	Response
Principle of Development	The principle of demolition could be established. There is no evidence that the building has been considered to contribute to the character, appearance or significance of the Conservation Area or adjacent listed building.	Agreed and noted that the building represents a 'neutral contributor' in the Conservation Area and therefore the principle of demolition is established.
	The scale of the floorplate is significantly larger than the existing dwelling and others found in the surrounding area. Further detail is required to be certain whether the development aligns with LP policies.	A comparison table has been provided in the DAS which shows how the proposed building compares to the existing both in terms of height and massing, as well as provides a comparison of other dwellings found in the surrounding area.
		The average built area compared to size of site is 17%, with the least being 8% and the most being 35%.
		The existing built area as proportion of site for Sevenoaks is just 10%. The proposal seeks to increase this to 11%.
		The proposal is therefore 35% smaller than the average built area as proportion of site found in the surrounding area.
Demolition of Dwelling	The applicant will need to justify the demolition of the existing	In terms of compliance with Part a)
	dwellinghouse on the property A Demolition Statement should be	justification is provided later for the
	submitted with a future application.	demolition of the building over reuse which
		includes deficiencies of the existing
	This is to meet the requirements of Policy LP38 relates to the loss	building including relating to low ceiling
	of housing. This section specifically outlines-	heights, change in levels and poor internal
	C. Redevelopment of existing housing should normally only take	configuration, poor quality workmanship
	place where:	and sustainability credentials.
	a. it has first been demonstrated that the existing housing is	
	incapable of improvement or conversion to a satisfactory standard	The new building is truly innovative and sustainable targeting Passivhaus standards
	to provide an equivalent scheme; and, if this is the case	
		and achieving net zero regulated
	b. the proposal does not have an adverse impact on local	operational energy.
	character; and	In terms of compliance with part b) this is
		demonstrated by proposing a building
	c. the proposal provides a reasonable standard of accommodation,	which is of exceptional design, and which
	including accessible design, as set out in LP 35 Housing Mix and	enhances the adjacent listed buildings,
	Standards.	especially Elmgrove House and
		surrounding Conservation Area.
		And finally, in terms of policy c) this is easily complied with given the proposal will provide an excellent standard of accommodation and will be more
		accessible than before with level access.

Heritage Impacts

Subject to further detail, the principle of demolition (in conservation As confirmed through the pre-app advice and design terms) could be established.

received, the current house makes little contribution to the Conservation Area.

It is considered that, subject to further assessment, a demonstrably high-quality replacement design may outweigh the loss of the The proposals aim to reduce the visibility of current building, in principle.

the property from the Conservation Area and Listed Building by reducing the overall

There is a stated aspiration to reduce the visibility of the current height from 21.18m to 19.77m which is an house in views from High Street. Removing urbanising developmentenhancement. from view would be welcomed as an enhancement to setting and thus significance and should be explored as part of the overall t is not possible to reduce the height of the balance.

building any further as floor to ceiling heights and level access requirements need to be

Any impact on curtilage listed structure, such as walls, would need met. to be addressed in a detailed submission, including how new landscaping could affect long-term stability and conservation.

The proposed driveway will remain in its current position in general, apart from minor alterations required for access for fire crew in the event of a fire. Therefore, there will be no impact to the Grade II listed wall. No other curtilage structures are affected.

The proposals aim to improve the historic landscape setting and grounds of Elmbridge House through bringing back the historic orchard, and through native planting and integrated landscaping on the building itself.

Urban Design

Architecturally, many of the sound design principles were discussed on-site - an aspiration to take a whole life carbon approach which is circular in concept, minimising upfront embedded carbon whilst being net-zero in operation: all while being low-slung, landscape-led and elegantly lightweight. In principle, this is a positive ambition, which if properly realised in a detailed proposal could be supported

The proposed house is low slung and efforts have been made to sink the main volumes to reduce built visibility from the high street.

The proposed construction of the dwelling above ground would be predominantly timber framed, with steel kept to a minimum and only where absolutely necessary for structural integrity.

10% of material will be re-used as per the report prepared by Hodkinson.

A whole life carbon approach has been taken and the new dwelling aims to achieve the highest level of sustainability achieving net zero regulated operational energy

The proposal incorporates significant building integrated landscaping/ greening with facades and canopies capable of receiving climbing plants and intensive green roofs.

		Significant areas of glazing are present only to the south façade, with minimal amounts of glazing to the north, east & west facades.
Residential Standards	The Council set out residential standards which are required to be met including space standards, access to sunlight and adequate circulation and amenity space.	The accompanying Residential Space Standards Report provides details on how the new dwelling will be designed to a high-quality specification.
		The dwelling will exceed space standards including floor to ceiling heights and storage space requirements and will be dual aspect. It will benefit from ample daylight and open outlook as demonstrated by the architectural drawings submitted in support of the application.
Residential Amenity	The site has a number of neighbouring sites being a mid-block site and, fortunately, most have large back gardens which afford separation distances of around 15-30m from the existing dwelling. Considering the lower profile of the proposal, it is expected that impacts relating to visual dominance can be managed in line with the suggested urban design guidance previously discussed. From a desktop assessment there are limited side facing windows. Specific regard should be given to overlooking impacts to the neighbouring dwelling immediately south of the subject site, as the proposal extends farther toward this shared boundary than the existing dwelling. Given the separation distances, it is expected that amenity impacts can be managed appropriately, noting this is subject to a further assessment at planning submission stage. The applicant should consider obscure glazing and non-opening below 1.7m any upper storey windows that directly overlook neighbouring sites (less than 20m from opposite neighbouring windows or outdoor living spaces).	To ensure the privacy of occupants is upheld, all windows in main facing habitable rooms are positioned more than 20 meters
Affordable Housing	One dwellinghouse is proposed and a financial contribution would therefore be expected on this site. The contribution would be secured via legal agreement in the event of a successful application. If a reduction in Affordable Housing contribution is sought on viability grounds, the applicant will need to submit a viability report	respect for surrounding residential amenity. A Viability Report has been submitted alongside the application which demonstrates that it is not viable for the applicant to provide an affordable housing contribution.

	for consideration with the application. This report will be assessed	
	independently at the cost of the applicant.	
Flood Risk and Sustainable Drainage	A flood risk assessment should be submitted to identify general mitigation measure for flood risk and how any additional surface runoff will be managed.	An FRA and SuDS has been submitted alongside the application which sets out the flood risk and SuDS measures being employed in the development.
	The inclusion of basement/below existing ground level works is likely considering the landscape strategy. Whilst there would be no	
	in principle objection to a modest cut for foundation work in this location, this does trigger additional information requirements.	A BIA has been prepared and is submitted alongside the application.
	A Basement Impact Assessment would be required.	
Transport	There is little information relating to the transport and highway items within the documents. The applicant appears to wish to relocate the existing driveway slightly, but there is nothing that states whether or how this will affect the existing vehicular access and crossover. The existing crossover is wider than current standards would allow, and my recommendation would be to retain it in its existing position, rather than try to relocate it. We would need better drawings showing the access and driveway to make a more informed assessment. It is clear there is ample room within the site for parking; however, the applicant should provide a parking layout drawing. In addition, London Plan 2021 policy T5 requires a minimum of two secure covered cycle spaces for such a development, details of which will	Refuse storage for the dwelling has been provided at the front of the site, with bins in storage cupboards along the boundary wall of the property. On collection day, the refuse bins can be collected by the refuse collection operatives and returned to the store. The dwelling will have recycling sorters under the sink in the kitchen to encourage separating refuse at source. There will be cycle storage with vertical racking to enable ample bike storage within
	be required, as will the refuse and recycling arrangements.	the boot room. There are two dedicated vehicle parking bays in front of the proposed dwelling, with overspill parking also available.
Construction	In order to demonstrate the development would not have an unacceptable impact on the public highway and neighbours, the applicant will be required to submit a detailed Construction Management Plan for the project	A draft Construction Method Statement and Construction Management Plan have been prepared by experienced transport consultants RGP and is submitted in support of the application.
Sustainability	 The following would be required to be demonstrated through any future application: A completed Sustainable Construction Checklist National water standard statement Energy Report demonstrating that the scheme achieves a 35% carbon emissions reduction target beyond Part L 2013 of the Building Regulations. 	The Sustainable Construction Checklist, National Water Standard Statement have been prepared. An Energy Report has also been prepared which demonstrates that the highest level of sustainability achieving net zero regulated operational energy.
Fire Safety	London Plan policy D12 requires the submission of a Fire Safety Statement on all planning applications. The Fire Safety Statement should be presented as a standalone document with a clear structure that addresses the criteria set out in London Plan Policy D12 part A.	A Fire Safety Statement has been prepared which sets out the fire safety measures which will be employed at the new development.
Trees/landscaping	From the information provided it is difficult to say whether the proposal will lead to a harmonious relationship with the existing trees on the site. At application stage we would require a Tree Survey, Arboricultural Impact Assessment and Method Statement to demonstrate that the trees on site can be protected from the direct and indirect impacts from the development.	
Ecology		recommendation made for additional bat surveys to be undertaken. The bat surveys are underway and a roost was found in the

	 An external lighting plan, complete with a lux contour plar showing the level of light spill onto the surrounding areas i will expect to see no increase in artificial lightspill onto trees, buildings or open sky. A Construction/Demolition Ecological Management Plar (to be informed by the ecology surveys). Full hard and soft landscaping details Ecological Enhancement Plan 	is provided in the DAS. External overhangs alongside external blinds mitigate light spillage.
Biodiversity Net Gain	Biodiversity Net Gain is now mandatory for all developments. The applicant is however advised that commencement of BNG has changed how applications for planning permission more generally are processed in the system. For example, all applicants applying for planning permission will now be required to set out whether they believe their development is (or is not) subject to BNG, and if they believe that the proposed development is not subject to BNG they must set out the reasons for this	The application will be a self build project and therefore the mandatory 10% net gain is not required to be met. Nevertheless, the proposals do propose biodiversity improvements at the site.

4. Planning Policy Summary

4.1. The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The framework is a material consideration in planning decisions. It also provides guidance on how to draw up Development Plans and policies.

National Planning Policy Framework

4.2. The overarching National Planning Policies comprise the National Planning Policy Framework (NPPF) (2023), supported by the National Planning Practice Guidance.

Development Plan Policies

- 4.3. For the purpose of any area in Greater London the development plan is:
 - The London Plan (2021) which sets out the spatial development strategy for the city; and
 - The Development Plan for Richmond comprises the Richmond Local Plan (2018)
- 4.4. It should be noted that Richmond have commenced work on their new Local Plan and the local plan hearings were undertaken in June and July this year, with adoption expected in Winter 2024/25. Whilst the emerging plan is a material consideration, only moderate weight can be given to the plan prior to modifications stages.

Other Material Considerations

- 4.5. The National Planning Policy Framework (July 2021) and Supplementary Planning Documents are also material considerations in planning decisions including the following SPDs
 - Affordable Housing (2014)
 - Refuse and Recycling Storage Requirements (2022)
 - Residential Development Standards and Housing Optional Technical Standards Update (2010 and 2015)
 - Design Quality SPD (2006)

5. Planning Considerations

Principle of Development

- 5.1. In terms of the principle of redevelopment, the relevant key policy is Local Plan Policy LP38 (Loss of Housing) which states -
 - A. Existing housing should be retained.
 - B. Proposals for reversions and conversions should assess the suitability of the property and design considerations.
 - C. Redevelopment of existing housing should normally only take place where:
 - a. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and, if this is the case
 - b. the proposal does not have an adverse impact on local character; and
 - c. the proposal provides a reasonable standard of accommodation, including accessible design.
- 5.2. As raised in the preceding sections, the existing building constructed in the 1950s has undergone a series of alterations and unsympathetic ad hoc extensions. The result is that the intervention has harmed the buildings legibility, quality, form and character. Other pitfalls include the low floor to ceiling heights, change in levels across floors, redundant spaces and long corridors, and no real central living space suited to modern day living requirements. The refurbishment of the dwelling cannot be refurbished to provide an equivalent high-quality scheme.
- 5.3. It is also important to assess the impact of the replacement dwelling in terms of carbon reductions. The development aims to target net zero through the design, layout, construction, materials and services. It will far exceed Policy LP22 and as the Energy Report demonstrates and will achieve the highest level of sustainability achieving net zero regulated operational energy.
- 5.4. The proposed development seeks to replace this existing dwelling with a five-bedroom home, designed with sustainable, innovative materials, and aiming to achieve near Net Zero carbon emissions. According to the Energy and Sustainability Report by Hodkinson Consultancy, the proposed energy strategy will result in a Net Zero home without the need for carbon offsetting. This far exceeds all current policy requirements, including Part L. A comparison was made with a refurbishment-only option which confirms that refurbishment only works would result in significantly higher operational energy use overall.
- 5.5. Although not required by policy, we have submitted a whole life carbon report prepared by Hodkinson with the application which sets out that the proposed development will fall well within the GLA benchmarks. While the embodied carbon for the new build (Module A1-A5) is estimated at approximately 555 KgCO2/m², this figure, when viewed in isolation, might appear high. However, the existing building is over 70 years old, exceeding the RICS standard design life of 60 years, and would require significant refurbishment to meet current design and energy standards. Refurbishment of the current dwelling would generate around 200 KgCO2/m² in embodied carbon over the next 60 years. However, even with these upgrades, the operational energy performance would still fall short of Net Zero standards.
- 5.6. The proposed demolition and redevelopment provide a more sustainable long-term solution, both in terms of operational energy and overall environmental impact. It will be constructed to reduce energy demand and carbon dioxide emissions through the installation of air source heat pumps and the installation of PV's. The operational carbon will be significantly reduced in the long term through thermal insulation and new plant and services. Therefore, the loss of the existing dwelling is justified, and the proposal aligns with part a. of the policy.
- 5.7. In terms of compliance with part b) this is demonstrated by proposing a building which is of superior design, and which respects the adjacent listed building Elmgrove House and surrounding Conservation Area.
- 5.8. The proposed building has been scaled back when compared to the existing massing and is now low level to respect the setting and significance of Elmgrove House and the wider Conservation Area. It now sits discreetly on the site and can hardly be seen from the wider conservation area.

- 5.9. The proposed style of the building provides a nod to the historical context of the site and surrounding context including the use of local materials including timber and brick. The colour tone of brick proposed has been chosen to match the colour of the adjacent listed curtilage wall.
- 5.10. The proposal demonstrates a unified and holistic design, to replace a piecemeal 1950s building. The replacement dwelling is intertwined with the landscaping through green roofs and new planting, and it recreates the orchard at the front of the property which once depicted the historical character of the site.
- 5.11. The proposals also involve the removal of the two outbuildings which currently detract from the openness and character and appearance of the site. The removal of these outbuildings will make a positive contribution to the Conservation Area.
- 5.12. And finally, in terms of policy C c) this is complied with given the proposal will provide an excellent standard of accommodation and will be more accessible than before with level access.
- 5.13. It is therefore considered the proposed replacement dwelling complies with Local Plan Policy LP38 (Loss of Housing) and the principle of development should be supported.

Housing Mix

- 5.14. Policy LP35 (A) states that development should generally provide family sized accommodation in this location, and London Plan Policy H10 Housing size mix at part A.9 also refers to the need for family housing.
- 5.15. The proposal involves the demolition of a 5-bed dwelling house in replacement for the equivalent and so bearing in mind the above this should be supported.

Affordable Housing

- 5.16. Policy LP 36 of the Local Plan requires all housing sites to contribute towards the provision of affordable housing. On sites providing fewer than 10 units a contribution is expected. It is important to note that this requirement does not align with that set out within the National Planning Policy Framework which sets the relevant threshold at 10 dwellings. This divergence was considered and justified in response to local circumstances during the Local Plan examination.
- 5.17. Given the proposal is a replacement dwelling and there is only a marginal increase in floorspace, it would not be viable to provide an affordable housing contribution. Insofar as Policy LP 36 and the Affordable Housing SPD allows for requirements to be modified based on economic viability; the applicant has provided a viability report with the application which demonstrates the development cannot provide any contribution.

Height and Massing

- 5.18. The proposal would result in the demolition of the existing two-storey building and replacement with a two-storey dwelling which would be lower than the existing property and the neighbouring listed property.
- 5.19. The proposed design has evolved from analysis of the unique plot characteristics. The dwelling is located within a generous plot and the important landscape quality of its setting will be retained in views from the streetscene.
- 5.20. The scale of the footprint is not overly dominant having regard to other properties within the area and in particular the two-storey height is subservient to the landscape, further aided by green roofs. The verdant quality of the plot which contributes to the character of the area will not be harmed as the proposal would retain a large portion of the garden.
- 5.21. There are a wide variety of larger modern dwellings in the locality as shown in the DAS submitted in support of the application. The average built area compared to size of site is 17%, with the least being 8% and the most being 35%. The existing built area as proportion of site for Sevenoaks is just 10%. The proposal seeks to increase this to 11%. The proposal is therefore 35% smaller than the average built area as proportion of site found in the surrounding area. It is therefore not considered that the proposal would be out of scale with those neighbouring properties.

Design

5.22. Policy LP1 of the Local Plan requires all development to be of high architectural and urban design quality and compatible with local character in terms of development patterns, scale, height and design.

- 5.23. Full details of the design proposals are provided in the DAS prepared by Holland Green Architects. The existing roof form is pitched; the proposed roof would be a flat roof and efforts have been made to sink the main volumes to reduce built visibility which lessens the impact on the adjacent listed building and visibility from the high street.
- 5.24. The proposed design is of a modern approach, constructed in brick, timber, bronze cladding and with a green roof spanning the entirety of the roof and aluminium windows throughout. The proposed construction of the dwelling above ground would be predominantly timber framed, with steel kept to a minimum and only where absolutely necessary for structural integrity.
- 5.25. A whole life carbon approach has been taken and the new dwelling aims to achieve the highest level of sustainability achieving net zero regulated operational energy. 10% of material will be re-used as per the report prepared by Hodkinson.
- 5.26. The proposal incorporates significant building integrated landscaping/ greening with facades and canopies capable of receiving climbing plants and intensive green roofs. Significant areas of glazing are present only to the south façade, with minimal amounts of glazing to the north, east & west facades.

Heritage

- 5.27. The existing property was constructed in the 1950's, in a historicist, pseudo 'Arts & Crafts' style. It has been extended on several occasions. It is neither statutory nor locally listed but is within the immediate setting of Elmgrove House (Grade II) and is situated within the Hampton Village Conservation Area.
- 5.28. A Heritage Report has been prepared by Heritage Potential to assess the impact of the proposals. As the Report sets out, the current structure is of 1950's construction and has been subject to numerous extensions and alterations in the intervening years. To some extent it reflects a loosely 'Arts and Crafts' design intent, but this now appears confused and diluted from the degree of late 20th and early 21st century alteration.
- 5.29. The planning history list identifies the key interventions including side extensions, a significant modern flat roof extension to the rear, that is jarring against the bulk and articulation of the main house and the erection of two modern outbuildings further to the rear. The collection of structures therefore reads as piecemeal and further betrays the pastiche of the main dwelling.
- 5.30. When considering demolition of a building in the Conservation Area from a heritage standpoint, Policy LP 3 Designated Heritage Asset of the Richmond Local Plan is most relevant which states-

Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:

- 1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
- 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or
- 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.
- 5.31. A Heritage Report assessment considers the existing building to be a neutral feature in the context of the wider conservation area and a neutral feature in the setting of the listed building. In this context, there is scope in policy and guidance for the building to be replaced where this will result in a high-quality building that will improve its appearance in the context of the conservation area and their environmental performance.
- 5.32. It concludes that the proposals -

'Aims to be more modest in height compared to the existing building and better intertwined into its immediate landscape setting. To this end, the proposals align with policy and guidance in relation to replacement dwellings in the historic environment. The proposals would not result in harmful impacts to the Hampton Village Conservation Area nor Elmgrove House. All other identified heritage assets would not be impacted'.

5.33. The Conservation and Design Officer confirmed support for a replacement dwelling during pre-application discussions, commenting as follows:

'Subject to further detail, the principle of demolition (in conservation and design terms) could be established.

It is considered that, subject to further assessment, a demonstrably high-quality replacement design may outweigh the loss of the current building, in principle.

There is a stated aspiration to reduce the visibility of the current house in views from High Street. Removing urbanising development from view would be welcomed as an enhancement to setting and thus significance and should be explored as part of the overall balance.

5.34. To this end, the proposals align with policy and guidance in relation to replacement dwellings in the historic environment. The proposals would not result in harmful impacts to the Hampton Village Conservation Area nor Elmgrove House.

Residential Quality

- 5.35. Policy LP 35 set out residential standards which are required to be met including space standards, access to sunlight and adequate circulation and amenity space.
- 5.36. The accompanying Residential Space Standards Report provides details on how the new dwelling will be designed to a high-quality specification.
- 5.37. The dwelling will exceed space standards including floor to ceiling heights and storage space requirements and will be dual aspect. It will benefit from ample daylight and open outlook as demonstrated by the architectural drawings submitted in support of the application.
- 5.38. Bin storage will be provided in line with the Council's Refuse and Recycling Storage Requirements SPD including 2 no. 90 litre bins, 2 no. 50 litre recycling boxes and 1 no 23 litre food waste bin and this will be placed in a storage unit near the road. The bins will be in storage cupboards along the boundary wall of the property and on collection day, the refuse bins can be collected by the refuse collection operatives and returned to the store. Further details are provided within the submitted DAS alongside this application.
- 5.39. The property has a large garden with the proposed built area only taking up 11% of the site, which means there is ample amenity space.
- 5.40. Furthermore, there are a number of open spaces close to the site including Bushey Park which is only a 15-minute walk. Further afield, the property is close to the Thames to the north, and to Richmond Park to the south, offering further access to open space.
- 5.41. Further details are provided within the DAS and Residential Standards schedule submitted alongside the application to demonstrate compliance with the Residential Development Standards and Housing Optional Technical Standards Update (2010 and 2015) Design Quality SPD (2006).

Residential Amenity

- 5.42. Policy LP8 requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. To protect privacy, there should normally be a minimum distance of 20m between main facing habitable room windows.
- 5.43. Privacy and separation distances between habitable rooms is an important consideration and it is confirmed that any potential for overlooking would not change as a result of the proposals. The profile of the 2-storey element of the proposal is similar to that of the existing house, whereas the single storey living accommodation is low lying and cannot be directly observed from neighbouring properties at ground level. To ensure the privacy of occupants is upheld, all windows in main facing habitable rooms are positioned more than 20 meters apart as shown in the DAS. This distance is consistently maintained, thereby eliminating any potential for overlooking between residences.
- 5.44. Additionally, there are no overlooking impacts on the neighbouring properties immediately south of the site. The adjacent building, a pool facility, features only a single high-level window at roof height, making it impossible for anyone to view into the habitable spaces of the proposed development. This thoughtful design consideration fosters both privacy for occupants and respect for surrounding residential amenity.

- 5.45. An Acoustic Report has been prepared by Sound Planning in relation to the proposed air source heat pumps and their potential noise impact on the nearest noise sensitive receiver using appropriate methodologies and assessment criteria, and to design a suitable noise mitigation strategy if required. It confirms that subject to installation of units below the identified combined sound power level, the installation is likely to comply with the requirement of the local authority and national planning policy and avoid significant impacts on nearby residents.
- 5.46. A draft Construction Management Plan has been prepared by RGP which sets out how the proposals can come forward to protect residential amenity and minimise highways disturbance through the construction period. The proposal is therefore not considered to harm the existing living conditions of neighbours.

Transport

- 5.47. The proposals will not alter the access arrangements to and from the site. The only change is the gate will be made slightly larger to allow for a fire engine to enter the site in the event of a fire.
- 5.48. There are two dedicated vehicle parking bays in front of the proposed dwelling which will be the same as existing.
- 5.49. The proposed development would include appropriate cycle storage in line with policy requirements of the London Plan and London Cycle Design Standards. There will be cycle storage for 10 bicycles with vertical racking to enable ample bike storage within the boot room of the dwelling.

Trees

- 5.50. Policy LP16 of the Local Plan requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complements the existing and creates high quality green areas, amenity and biodiversity benefits.
- 5.51. There are a large number of mature trees on the site, including a group at the front subject to a Tree Protection Order. The trees are also protected as a result of them being located within the Conservation Area. An Arboricultural Impact Assessment and Arboricultural Method Statement has therefore been undertaken by Merewood which sets out the impacts of the proposals on the existing trees on site.
- 5.52. The survey revealed that of the 29 trees surveyed, 4 are category 'A', 9 are category 'B' and 16 are category 'C'. In order to facilitate the proposed demolition and replacement dwelling together with the redefinition and enhancement of the gardens around the new house, tree removal is required. The proposed development will result in the loss of 3 category 'C' Trees (T22, T23 and T24) which are categorised as palm trees.
- 5.53. However, it is considered the principal arboricultural features of the site will be retained and protected through demolition and construction, including all Category A and B trees. A soft landscaping and tree planting scheme is proposed which involves the planting of new orchard trees an oak and variety of other native trees which more than mitigates the loss of existing non-native palm trees.
- 5.54. The removal of the palm trees will not result in the loss of trees of high amenity value, ecological value or trees which make an essential contribution to the sites landscape and historic value of the site and wider conservation area. Further, the removed trees are at the rear of the site and cannot be seen from the wider conservation area and therefore don't make a positive contribution to the surrounding character and appearance of the conservation area.
- 5.55. The proposals have been designed to ensure a sensitive approach to trees and to ensure protection during construction where required and this is set out in the Arboricultural Method Statement.
- 5.56. It has therefore been demonstrated that the proposals comply with Policy LP16 of the Local Plan.

Landscaping and Biodiversity

5.57. A detailed landscape scheme has been prepared by Holland Green and which sets out the high-quality landscape approach to the site including boundary treatments. It notes the existing garden and house are not clearly connected. The existing planting is incohesive without clear style or purpose. The site has many mature trees and some sections of formal hedge with lawn comprising most of the garden footprint.

- 5.58. It is proposed that the retained soft landscaping elements will be complimented harmoniously with new. To pay tribute to the historic context of the site, a new orchard will be introduced, and a new oak tree will be planted to replace the one that was lost and represented the seventh oak tree of the house name 'Sevenoaks'. The three palm trees removed will be more than compensated for with new native trees, meadows, hedgerows and planting which are considered more appropriate for the site.
- 5.59. Whilst the site is exempt from the 10% Biodiversity Net Gain regulations as set out in the Tunley Environmental Statement due to benefiting from self-build exemption, the applicants are committed to improving the environmental infrastructure by implementing a biodiverse green roof, new planting areas, new pond, and new native hedgerows. The three palm tree removals has meant that the quantitative metric of 10% BNG cannot be achieved on site, but this is more than made up for by the proposals for native tree planting which is considered more appropriate for the site.

Ecology

- 5.60. A Preliminary Ecological Appraisal has been undertaken by Phillips Ecology which confirmed the site is considered to support opportunities for protected and priority species including bats, breeding birds, reptiles, badgers and hedgehog. The report makes recommendations for badgers, hedgehogs, reptiles and breeding birds during construction works. It also makes suggestions for biodiversity enhancement including incorporation of bat and bird boxes which will be incorporated into the scheme.
- 5.61. Whilst the existing outbuildings had no potential for bats, the existing house is considered to support high suitability for roosting bats. This assessment was based on the large numbers of gaps under the roof tiles on the building. In order to confirm the presence/absence of roosting bats, characterise any bat roosts, assess the extent that they may be affected by the proposed works and develop a proportionate and appropriate mitigation strategy, further survey work is required. The recommended survey effort for structures with high roost suitability is three presence/absence surveys. To date, two emergence surveys have been completed, with the third arranged for the 12 September 2024. The initial surveys have confirmed the presence of a soprano pipistrelle day roost within the property. The upcoming third survey will confirm the presence/absence of further roosts and inform the mitigation strategy for the proposal.

FRA, SuDS and Basement Impact

- 5.62. The Site is located in Flood Zone 1 of the Flood Map for Planning and typically does not require an FRA to be submitted at planning. However, the Site is located within a Critical Drainage Area (CDA), and as per national policy, an FRA is required to submit at planning when there is an increase in vulnerability type to the Site and is at risk of flooding from other sources.
- 5.63. Policy LP21 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 into account climate change and without increasing flood risk elsewhere.
- 5.64. During the pre-app feedback it was confirmed that any future application should be submitted with a flood risk assessment and sustainable drainage statement, as well as a basement impact assessment as a basement is proposed.
- 5.65. An FRA, SuDS and BIA report has been prepared by Create and this has been submitted alongside the application and this sets out the flooding risk and SuDS measures proposed.
- 5.66. The report demonstrates that although there are areas of minor surface water ponding predicted on the site, the development area itself is not at risk of surface water flooding. However, it has been recommended that the finished floor level and threshold levels be set 75-150 mm above surrounding ground levels in accordance with CIRIA Designing for Urban Exceedance. This is to prevent the ingress of any unforeseen surface water flooding.
- 5.67. An outline SuDS strategy has been included within the report and detailed runoff calculations have been undertaken for the site in its existing and proposed state. Runoff will be limited to 1 l/s, in accordance with the SuDS Hierarchy and to provide multiple benefits, a green roof and an attenuation tank have been proposed to provide storage prior to discharge. This ensures that there is a reduction in runoff from the site compared to the existing development which had an uncontrolled outfall. This reduces the risk of flooding to others.
- 5.68. The report also covers the Basement Screening Questions outlined in the LBR SFRA and LBR Basement Assessment User Guide in relation to flood risk and drainage. The answers to the Basement Screening Questions resulted in a BIA being undertaken in relation to potential surface water flooding at the site, permeable geology and the potential for below ground water interacting with the basement extension, and the management of surface water runoff due to an increase in impermeable areas post development.

5.69. The report concludes that the proposed development will therefore not increase surface water runoff rates and volumes from the site post-development and attempts to limit runoff, in so far as technically practicable, towards greenfield rates. This is compliant with the NPPF, the London Plan and local policy.

Energy and Sustainability

- 5.70. As the submitted Energy and Sustainability Statement and Sustainable Construction Checklist by Hodkinson sets out, the development proposes an exemplar eco home with the following standards met and exceeded in some cases
 - Energy efficiency: A net zero energy strategy has been devised using heat pumps, PV panels and battery storage, demonstrating
 an exemplar commitment to sustainability. This delivers a 100% reduction in regulated operational emissions without the need for
 offsetting, significantly exceeding the requirements of both adopted and emerging planning policy.
 - Overheating: The scheme has been designed to ensure overheating risk is reduced to acceptable levels in accordance with CIBSE TM52 and TM59:2017 and Part O building regs requirements. A separate standalone overheating report has been submitted.
 - Water efficiency: Water meters and water efficient fixtures and fittings will be installed in the dwelling to target a maximum internal daily water consumption of 110 litres/person/day. This is also set out on the national water efficiency statement submitted alongside the application.
 - Waste and recycling: Adequate facilities will be provided for domestic, and construction related waste, including segregated bins
 for refuse and recycling.
 - Circular Economy: The principles of a circular economy shall be incorporated into the development, where possible.
 - Materials: A Whole Life Carbon Assessment has been undertaken to assess and reduce the environmental impact of the
 development. Where practical, new building materials will be sourced locally to reduce transportation pollution and support the
 local economy. New materials will be selected based on their environmental impact and responsible suppliers will be used.
- 5.71. While the embodied carbon for the new build (Module A1-A5) is estimated at approximately 555 KgCO2/m², this figure, when viewed in isolation, might appear high. However, the existing building is over 70 years old, exceeding the RICS standard design life of 60 years, and would require significant refurbishment to meet current design and energy standards. Refurbishment of the current dwelling would generate around 200 KgCO2/m² in embodied carbon over the next 60 years. However, even with these upgrades, the operational energy performance would still fall short of Net Zero standards. The proposed energy strategy will result in a Net Zero home without the need for carbon offsetting. This far exceeds all policy requirements.
- 5.72. The proposed demolition and redevelopment provide a more sustainable long-term solution, both in terms of operational energy and overall environmental impact. It will be constructed to reduce energy demand and carbon dioxide emissions through the installation of air source heat pumps and the installation of PV's. The operational carbon will be significantly reduced in the long term through thermal insulation and new plant and services.
- 5.73. As far as possible a passive design approach will be adopted using the form and fabric of the building to optimise environmental comfort and minimise energy use. Large overhangs and vertical shading will minimise solar gains and passive ventilation through openings and design of spaces will ensure there is a good provision of fresh air throughout the property to avoid overheating.
- 5.74. The proposals therefore fully comply with adopted policies LP20 and LP22 of the Local Plan.

Fire

5.75. Fire safety has been considered, in particular attention paid to Policy D12 of the London Plan. A Fire Statement has been prepared and submitted in support of the application which confirms there will be appropriate measures taken to reduce the risk of life in the event of a fire.

6. Conclusions

- 6.1. It has been demonstrated that the proposals for the demolition of Sevenoaks house and associated outbuildings and replacement with a contemporary eco house of exceptional quality together with associated works including driveway alterations and landscaping is entirely acceptable and compliant with planning policy.
- 6.2. The scheme will reintroduce a beautifully designed family dwelling that is superior in terms of design, build quality, sustainability, materials and functionality to the existing dwelling, as well as enhancements to the wider grounds.
- 6.3. The proposals will improve the landscape character of the site through the implementation of a high-quality landscaping scheme which includes a biodiverse green roof, new planting areas, new pond, new native hedgerows and trees. To pay tribute to the historic context of the site, a new orchard will be introduced, and a new oak tree will be planted to replace the one that was lost and represented the seventh oak tree of the house name 'Sevenoaks'.
- 6.4. The scheme is considered and respects the surrounding area, considers separation distances and daylight and sunlight to protect nearby residential amenity.
- 6.5. The proposals have responded to feedback received during pre-application discussions and it is respectfully requested that planning permission is granted. The development proposals are acceptable as presented and in accordance with the Local Development Plan.