



PLANNING REPORT  
 Printed for officer by  
 Jeremy MacIsaac on 13 September  
 2024

**Application reference: 24/1818/HOT**  
 TWICKENHAM RIVERSIDE WARD

Date application received	Date made valid	Target report date	8 Week date
17.07.2024	19.07.2024	13.09.2024	13.09.2024

**Site:**  
 21 Ravensbourne Road, Twickenham, TW1 2DG,  
**Proposal:**  
 Two-storey front extension

**APPLICANT NAME**

Hong Liu  
 21 Ravensbourne Road  
 Twickenham  
 Richmond Upon Thames  
 TW1 2DG

**AGENT NAME**

Ms Sowji Chintalapati  
 204 Baker Street  
 Suite 112  
 Enfield  
 London  
 EN1 3JY

**Neighbours:**

- 32 Ravensbourne Road, Twickenham, TW1 2DQ, - 23.07.2024
- 34 Ravensbourne Road, Twickenham, TW1 2DQ, - 23.07.2024
- 30 Ravensbourne Road, Twickenham, TW1 2DQ, - 23.07.2024
- 2 Park House Gardens, Twickenham, TW1 2DE, - 23.07.2024
- 23 Ravensbourne Road, Twickenham, TW1 2DG, - 23.07.2024
- 19 Ravensbourne Road, Twickenham, TW1 2DG, - 23.07.2024
- 32 Ravensbourne Road, Twickenham, TW1 2DQ, - 23.07.2024
- 2 Park House Gardens, Twickenham, TW1 2DE, - 23.07.2024
- 23 Ravensbourne Road, Twickenham, TW1 2DG, - 23.07.2024
- 19 Ravensbourne Road, Twickenham, TW1 2DG, - 23.07.2024

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

Development Management

Status: WNA Application: 15/T0579/TCA  
 Date: 28/08/2015 T1 - Pride of India - Tidy broken branches and crown lift to 3m to maintain size and clear from Yew T2-3 - Plum - Reduce by up to 0.5m to maintain shape T4 - Juniper - Fell to ground level as dying

Development Management

Status: REF Application: 23/1764/PS192  
 Date: 16/10/2023 A single storey rear extension and a loft conversion to include hip-to-half-hip gable roof extensions, dormer and window.

Development Management

Status: GTD Application: 23/1765/HOT  
 Date: 05/09/2023 Erection of an outbuilding located in the rear garden of dwellinghouse

Development Management

Status: REF Application: 24/0492/PS192  
 Date: 22/04/2024 Hip-to-half-hip gable roof extensions, rear dormer and window

Development Management

Status: GTD Application: 24/0532/HOT  
 Date: 24/04/2024 A single storey rear extension.

Development Management

Status: GTD Application: 24/1153/PS192  
 Date: 28/06/2024 Roof extensions to both side and rear elevations

Development Management

Status: PDE Application:24/1818/HOT

Date: Two-storey front extension

Building Control

Deposit Date: 28.11.2014 Install a gas-fired boiler

Reference: 14/FEN04487/GASAFE

Building Control

Deposit Date: 24.08.2023 Single storey rear extension. Two storey front extension. Roof alterations to raise both hips and addition of dormer. Structural internal alterations to form WC, laundry room and en-suite. Remove the wall between the dining room and kitchen (works to incorporate material alterations to structure, controlled services, fittings and thermal elements).

Reference: 23/1285/IN

<b>Application Number</b>	<b>24/1818/HOT</b>
<b>Address</b>	<b>21 Ravensbourne Road Twickenham TW1 2DG</b>
<b>Proposal</b>	<b>Two-storey front extension</b>
<b>Contact Officer</b>	<b>Jeremy Maclsaac</b>
<b>Target Determination Date</b>	<b>13/09/2024</b>

## 1. INTRODUCTION

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

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

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

## 2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

The application site is a detached dwellinghouse, there are no permitted development restrictions.

The application site is part of St Margarets and East Twickenham Village and is designated as:

- Article 4 Direction – Basements
- CIL - Twickenham Riverside
- Village Character Area - Park House Gardens and surrounds – Area 1
- Area Susceptible to Groundwater Flood – Superficial Deposits Flooding
- Critical Drainage Area – St Margarets [Richmond]
- Susceptibility to Groundwater Flooding B

## 3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

The proposed development comprises two-storey front extension

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

There is no relevant planning history associated with the site.

## 4. CONSULTATIONS CARRIED OUT

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

No letters of representation were received.

## 5. MAIN POLICIES RELEVANT TO THE DECISION

### NPPF (2023)

The key chapters applying to the site are:

- 4. Decision-making
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change

These policies can be found at:

<https://www.gov.uk/guidance/national-planning-policy-framework>

### London Plan (2021)

The main policies applying to the site are:

D4 Delivering good design

D12 Fire Safety

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

### Richmond Local Plan (2018)

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

Issue	Local Plan Policy	Compliance	
Local Character and Design Quality	LP1	<del>Yes</del>	No
Impact on Amenity and Living Conditions	LP8	Yes	<del>No</del>
Impact on Flood Risk and Sustainable Drainage	LP21	Yes	<del>No</del>

These policies can be found at

[https://www.richmond.gov.uk/media/15935/adopted\\_local\\_plan\\_interim.pdf](https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf)

### Richmond Publication Local Plan (Regulation 19 version)

The Richmond Publication Version Local Plan (Regulation 19 version) was published on 9 June 2023 for public consultation which ended on 24 July 2023.

The Publication Version Local Plan, together with all the representations received during the representation period, the plan and its supporting documents were submitted to the Secretary of State for examination on 19 January 2024. The submission documents do not form part of the statutory development plan for the Borough, however, by publishing and submitting the Borough Local Plan for independent examination the Council has formally confirmed its intention to adopt the Publication Plan.

The Publication Version Local Plan, including its evidence base, are material considerations for decision-making. The weight to be given to each of the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. As the Council considers the emerging Borough Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations significant weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Therefore, the weight afforded to each policy at this stage will differ depending on the level and type of representation to that policy. This is addressed in more detail in the assessment below where it is relevant to the application.

Note that it was agreed by Full Council on 27 April, when the Publication Plan was approved, that no weight will be given to Policy 4 in relation to the increased carbon offset rate, and therefore the existing rate of £95 will continue to be used; in addition, no weight will be given to Policy 39 in relation to the 20% biodiversity net gain requirement; all other aspects and requirements of these policies will apply.

Issue	Publication Local Plan Policy	Compliance	
Flood risk and sustainable drainage	8	Yes	<del>No</del>
Local character and design quality	28	<del>Yes</del>	No
Amenity and living conditions	46	Yes	<del>No</del>

These policies can be found at

[https://www.richmond.gov.uk/media/16749/hpn\\_plan\\_2018\\_to\\_2033\\_january\\_2019.pdf](https://www.richmond.gov.uk/media/16749/hpn_plan_2018_to_2033_january_2019.pdf)

## Supplementary Planning Documents

Design Quality  
House Extension and External Alterations  
Residential Development Standards  
Village Plan - St Margarets and East Twickenham

These policies can be found at:

[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/supplementary\\_planning\\_documents\\_and\\_guidance](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance)

## Other Local Strategies or Publications

Other strategies or publications material to the proposal are:  
Strategic Flood Risk Assessment 2021

## 6. EXPLANATION OF OFFICER RECOMMENDATION

The key issues for consideration are:

- i. Design and impact on heritage assets
- ii. Impact on neighbour amenity
- iii. Trees
- iv. Flood risk
- v. Fire Safety
- vi. Biodiversity

### i Design and impact on heritage assets

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

Policy LP28 of the Publication Local Plan requires all development to be of high architectural and urban design quality. The character and heritage of the borough has been identified in the borough-wide characterisation work undertaken as part of the Urban Design Study. The 'places' as identified in the Study will need to be maintained and their character 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.

The Councils SPD relating to House Extensions and External Alterations states that:

- The overall shape, size and position of side and rear extensions should not dominate the existing house or its neighbours. It should harmonise with the original appearance, either by integrating with the house or being made to appear as an obvious addition.
- Avoid side extensions that project beyond the existing front elevation. Where the extension is to be subordinate to the existing house it is usually desirable to set back the extension by at least 1 metre behind the front elevation.
- Development, which would result in the significant reduction of an existing important space or gap between neighbouring houses, is not normally acceptable. In conjunction with existing extensions to neighbouring buildings this can have a terracing effect on the street. Consequently, two storey side extensions should be sited 1m from the side boundary.

The SPD notes:

*"5.2.2 Avoid side extensions that project beyond the existing front elevation – Where the extension is to be subordinate to the existing house it is usually desirable to set back the extension by at least 1 metre behind the front elevation."*

The property is a two storey house within a residential area. It is similar in appearance to numbers 15, 17, and 19 Ravensbourne. The building pattern mirrors numbers 3-9 Ravensbourne also, which all feature L shaped facades, prominent two storey bay windows, with gables above. Some have been altered to include single storey front porches. The proposals include a two storey front projection, effectively infilling the space forward of the front entrance. There would be a small set back included.

The scale of the proposal at two storeys would result in the addition appearing overly dominant in relation to the host property, incongruous with the surrounding environment and not line with SPD guidance. The front extension would degrade the established cohesive building pattern when viewed from the street, and the proposed roof would introduce a cluttered roofscape.

There is scope at the proposal site for a modest front porch extension, but two storey front extension would introduce an uncharacteristic and ungainly addition, harmful to the visual amenity of the street.

In view of the above, the proposal fails to comply with the aims and objections of policy LP1 of the Local Plan and LP28 of the Publication Local Plan and is not consistent with the SPD for house extensions. As set out above, the proposed extension will be of an excessive scale and visual bulk, dominating the front elevation of the existing building.

## **ii Impact on neighbour amenity**

*Policy LP8 states that development must protect the amenity and living conditions of existing, adjoining and neighbouring occupants. Design must allow for good daylight standards, avoid overlooking or noise disturbance, avoid visual intrusion, overbearing impacts or harm to the reasonable enjoyment of the uses of buildings and gardens. Harm may arise from various impacts such as noise, air pollution, odours or vibration.*

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

Given the siting and scale of the proposal, the neighbour most likely to be influence by the proposed development is no 19 Ravensbourne.

The proposed tow storey front extension would be less than a meter away from the boundary with no. 19. As there is some separation distance between the boundary and the sites, no issues with regards to loss of light are foreseen.

No glazing is proposed to face neighbouring properties, therefore acceptable privacy can be maintained.

The property will remain in residential use as a result of this development. No issues with regards to noise are foreseen.

The proposed scheme is considered acceptable in terms of neighbour amenity. The proposal is not considered to detrimentally impact the amenities of any neighbouring occupiers and therefore, is in line with policy LP8 of the local Plan and Policy 46 of the Publication Local Plan (Regulation 19 Version) and relevant Supplementary Planning Documents/Guidance.

## **iii Trees Issue iii – Trees**

*Policy LP 16 states that the Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits. It will also ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals.*

The proposal site is not designated within a Conservation Area, thus there is no protection of the trees on the site, nor are there any recorded Tree Preservation Orders (TPO) within or adjacent to the site of the proposal.

However, given the siting and layout, the existing on-site tree and adjacent trees are visible from public views on Ravensbourne Road, and therefore they are considered to be of amenity value.

The proposal has not included any detail or information regarding whether any trees are to be removed or the protection of the trees on or adjacent to the site.

Such details are required in order to assess the impact of construction activities which may act as a constraint upon the proposal. In addition, construction activities linked to the proposal could irreparably damage the roots, rendering nearby and/or neighbouring trees unstable and susceptible to failure. It is vital therefore, that these potential impacts are appropriately assessed, and the nearby trees are suitably protected from both direct and indirect construction activity.

Had officers considered the scheme acceptable, the council would require that the area around nearby trees would be suitably protected from both direct and indirect construction activity and not used for the storage of any materials and/or machinery. This includes the impact of any ingress and egress routes for machinery. Supporting structures etc.

No Arboricultural Impact Assessment of protection details have been submitted, as such, the application fails to demonstrate impact of construction activities on nearby trees and thus does not comply with Local Plan Policy LP16.

#### **iv Flood Risk**

Policy LP21 of the Local Plan states 'All developments should avoid or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater, and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.'

The application site is located in Flood Zone 2.

A Flood Risk Assessment was submitted with the application. The floor level of the proposed extension will be lower than the floor level of the dwellinghouse.

As such, it is considered that the proposed scheme meets the aims and objectives of Policy LP21 of the current Local Plan (2018) and policy 8 of the Publication Local Plan (Regulation 19 Version).

#### **v Fire Safety**

The applicant has submitted a 'Fire Safety Strategy' as required under Policy D12 Of the London Plan (2021).

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

#### **vi Biodiversity**

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

### **7. LOCAL FINANCE CONSIDERATIONS AND OTHER MATTERS**

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. The weight to be attached to a local finance consideration remains a matter for the decision maker. The

Mayor of London's CIL and Richmond CIL are therefore material considerations.

On initial assessment this development is not considered liable for the Mayoral or Richmond CIL however this is subject to confirmation by the CIL Administration Team

**8. RECOMMENDATION**

This recommendation is made following careful consideration of all the issues raised through the application process.

For the reasons set out above, it is considered that the adverse impacts of allowing this planning application would significantly outweigh the benefits, when assessed against the policies in NPPF (2021) and Development Plan, when taken as a whole.

**Refuse planning permission for the following reasons**

**Reason for Refusal –**

The proposal's siting, scale and design, would result in an overly dominant and visually incongruous form of development to the detriment of the design and appearance of the host building and wider streetscape. As such, the proposal fails to comply with, in particular, policies LP1 and LP28 of the Publication Local Plan, and Supplementary Planning Document: 'House Extensions and External Alterations'.

**Recommendation:**

The determination of this application falls within the scope of Officer delegated powers - YES/~~NO~~

**I therefore recommend the following:**

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

This application is CIL liable  YES\*  NO  
(\*If yes, complete CIL tab in Uniform)

This application requires a Legal Agreement in Uniform)  YES\*  NO  
(\*If yes, complete Development Condition Monitoring

This application has representations online (which are not on the file)  YES  NO

This application has representations on file  YES  NO

Case Officer (Initials): .....JMA.....

Dated: .....13/09/2024.....

**I agree the recommendation:**

  
Team Leader/Head of Development Management/Principal Planner

Dated: ...13/09/2024.....