



TOWN & COUNTRY PLANNING CONSULTANTS

Development Management
London Borough of Richmond upon Thames
Development and Street Scene
Civic Centre, 44 York Street
Twickenham
TW1 3BZ

BS/JLA_474

BY E-MAIL

28 November 2024

Dear Sir or Madam,

**RE: 21 & 23 QUEENS ROAD, RICHMOND, TW10 6JW
S73 APPLICATION: VARIATION OF CONDITION 2 FOR A MINOR MATERIAL
AMENDMENT
COVERING LETTER: SUPPORTING PLANNING & HERITAGE ASSESSMENT**

This letter – Supporting Planning and Heritage Statement, is submitted to the London Borough of Richmond upon Thames (“Council”), on behalf of Mr Anil Bangar (“Applicant”), in support of a S73 Application (“Application”) for the following: “*Variation of Condition 2 of appeal decision ref. APP/L5810/W/23/3333651 to consider a minor material change to the height of the approved side extension*” (“Proposal”) at 23 Queens Road, Richmond, TW10 6JW (“Site”).

This letter should be read in conjunction with the following documents:

- Existing, Approved and Proposed Drawings prepared by TW10 Architects

The purpose of this document is to draw out the key planning issues arising from the development proposal and to assess the proposal in light of the national, regional and local planning policy. This document will demonstrate that the Proposal accords with these policies.

The contents of this letter are as follows:

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1. BACKGROUND INFORMATION & OBJECTIVES

The Applicant is the owner of the Site and following the allowed appeal (for a change of use from student accommodation to C3 residential use, side extension, erection of a part width rear extension to the lower and upper ground floor and the creation of vehicular access to no 23 Queens Road with alterations and improvements to the front boundary walls and landscaping of both no 23 and no 21 Queens Road), seeks to make minor changes to the approved drawings, that being an increase in height to the side extension.

i. Site Description & Context

The Site comprises a late Victorian four-storey detached building, which is internally divided into 18 bedrooms and 4 communal spaces and previously in use as student accommodation. It sits in the middle of a group of three similar buildings joined at the elevated ground level by their entrance vestibules and single-storey side extensions. These are Nos. 21,23 and 25.

ii. Heritage Assets

The Site is not statutorily listed nor are any neighbouring properties. This property is in a conservation area (CA30, St Matthias Richmond) and locally listed (Building of Townscape Merit ("BTM")).

iii. Planning History

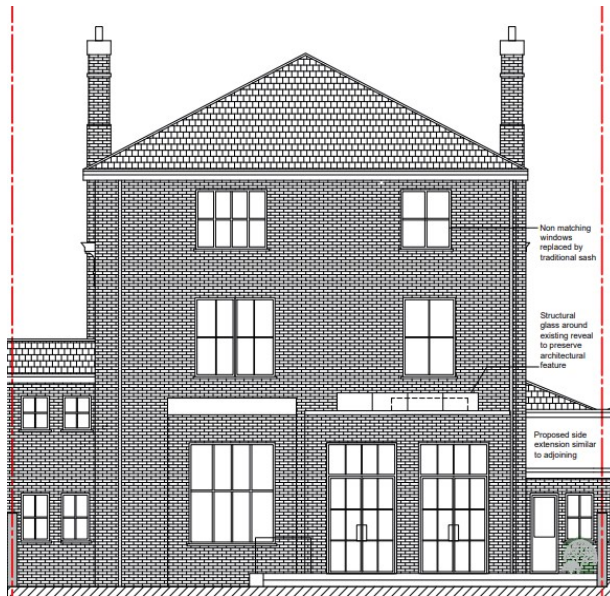
A planning history search for the Site has been undertaken by making use of the online property search engine on the Council's website.

- Planning permission was granted under ref. 22/3233/FUL for a change of use from student accommodation to C3 residential use, side extension, erection of a part width rear extension to the lower and upper ground floor.
- A variation of the above application under ref. 23/1623/FUL, to include the creation of vehicular access to No. 23 Queens Road with alterations and improvements to the front boundary walls and landscaping of both no. 23 and no.21 Queens Road was allowed at appeal (APP/L5810/W/23/3333651).

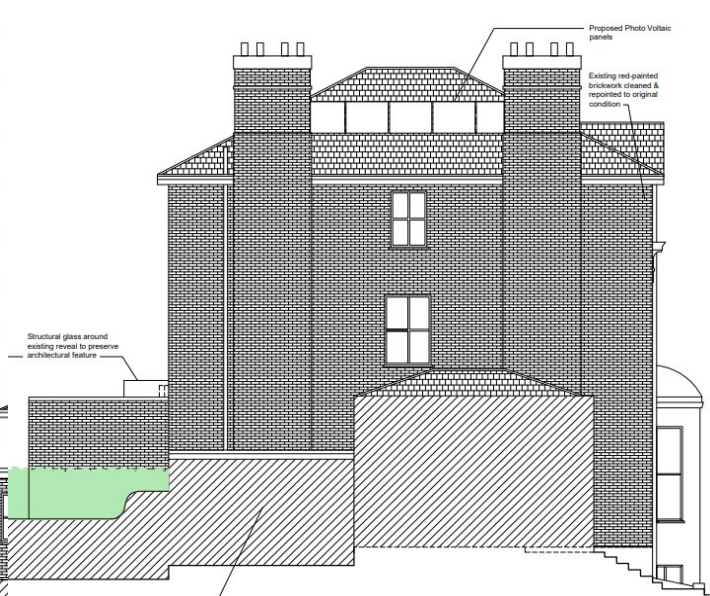
2. PROPOSED DEVELOPMENT

The Proposal involves a variation of the approved drawings to increase the height of the approved side extension (comprising a pantry), sited to the south elevation of the building. The increase in height would align with the height of the approved rear extension and a similar pattern of fenestration is proposed.

Approved Rear Elevation



Approved Side Elevation



Proposed Rear Elevation



Proposed Side Elevation



3. PLANNING POLICY POSITION

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, when determining a planning application, regard is to be given to the Development Plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

- National Planning Policy Framework ("NPPF") (2023)
- The London Plan (2021)

- Richmond upon Thames Local Plan ((2018):

Key policies comprise, but are not limited to:

- LP 1 Local Character and Design Quality
- LP 3 Designated Heritage Assets
- LP4 Mon-Designated Heritage Assets
- LP 8 Amenity and Living conditions

- Richmond Publication Local Plan (Regulation 19 version)

The Publication Version Local Plan, including its accompanying documents, have been published for consultation on 9 June 2023. Together with the evidence, it is noted that the Plan is a material consideration for the purposes of decision-making on planning applications.

The weight to be given to each of the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. The Council considers the emerging Local Plan to be sound and legally compliant and weight is thus accorded to relevant policies and allocations in the determination of applications.

- Richmond upon Thames Supplementary Planning Guidance/Documents:

- Design Quality (2006) SPD
- House Extensions and External Alterations (2015) SPD

4. PLANNING CONSIDERATIONS

The main material planning considerations to be considered as part of this assessment are as follows:

- Design and Impact on Heritage Assets
- Neighbour Amenity
- Other Material Considerations

i. Design & Heritage

Policy Position

The NPPF advises that great importance is attached to the design of the built environment, and it is important to plan positively for the achievement of high quality and inclusive design for all development.

Local Plan Policy LP 1 states that new development must be of a high architectural and urban design quality. Development must be inclusive, respect local context and contribute positively to its surroundings based on a thorough understanding of the site and its context and relationship to the public realm.

Within Paragraph 4.1.3, Local Plan Policy LP 1 requires developers and applicants to take a sensitive approach to the architectural design of new buildings, extensions and modifications to existing buildings, as well as landscape proposals. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be to a high quality. Schemes should be based on a sound understanding of the site and its context, following the locally specific guidance set out in the Village Planning Guidance SPDs.

Policy 28 of Draft Publication Version (Reg 19) Local Plan (2023) states that proposals must be: *“compatible with the local character, including the relationship to existing townscape, development patterns, views, local urban grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing.”*

The Planning (Listed Building and Conservation Areas) Act 1990 requires decision makers to have 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (section 66) and that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.' (section 72).

Local Plan 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. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.

Policy LP4 states that development shall preserve the significance, character and setting of non-designated heritage assets.

Policy Justification

For context and in relation to heritage matters, please refer to the Heritage Statement prepared by Heritage Information submitted on the approved applications.

In relation to the approved extensions, the following was previously set out:

- The rear extension would be proportionate in scale and form, being subservient to the BTM and compliant with the objectives set out in the SPD for house extensions.
- Materials would be complementary and would match the existing building, thereby assimilating successfully.
- In the context of the dwelling's scale, the proposed extensions and alterations would be modest and would respect the existing hierarchy of the host building. The Proposals would not compete with the existing historic context of the original house, preserving the integrity and legibility of the main dwelling.
- With Reference to Policies LP1, LP3 and LP 4, the proposed extensions and alterations are designed to a high architectural and urban standard. The design has been informed by the thorough analysis of the heritage values of the Site and its context and proposals are composed to ensure that these values are sustained and enhanced.

- The conclusion in the Heritage Statement was that the Proposals are very well considered and are respectful both to the merits of the host property and its setting, as well as the wider historic context. In addition, those elements of the Site that currently make a positive contribution to both the Conservation Area, BTM and adjacent BTMs, would be preserved.

In response, the Officer's Report agreed with the above, stating: *"This size and form would result in an extension which would be subservient to the original building and would not dominate the rear elevation. Although it is proposed to be in a simple, contemporary style, this style is considered to be modest enough to integrate with the existing building, especially given that it is proposed to be constructed in matching stock brick. The resulting extension would be clearly legible as a modern addition to the building, while remaining subservient enough not to detract from the overall architectural style and significance of the main building."*

In relation to the side extension, planning officers' held that the proposed side extension is acceptable, as largely reflects that at the adjoining property No.21. It is understood the side extension will be constructed in brick material to match the existing property as well as timber fenestration.

The proposed increase in height of the side extension would be no higher than the existing side extension and would thus not be visible from Queens Road. Views of the rear elevation of the building from Marlborough Road are limited and, given the projection of the approved rear extension, the proposed amendment to the side extension would not be perceptible.

The increase in height would remain proportionate in scale and form, allowing this to be read as a subservient addition to the BTM. The height aligns with the approved rear extension, which was deemed acceptable. As the side extension would be set back from the rear extension without projecting from the original rear elevation of the building, it is not considered that the proposal would give the perception of the rear extension being unduly enlarged.

The proposed fenestration would mirror that of the approved rear extension and would appear as a set of coherent extensions to the building.

The character, appearance and setting of the BTM and the wider visual qualities of the conservation area would therefore be preserved.

The proposed development would thus accord with relevant paragraphs of the NPPF, London Plan and local Policies LP1, LP3, LP4 and SPD for House Extension and Alterations.

The Proposal would also comply with the statutory duties specified in the Planning (Listed Buildings and Conservation Areas) Act 1990 by paying 'special regard' to preserving or enhancing the heritage significance and setting, character and appearance of the St Matthias Richmond Conservation Area.

ii. Neighbour Amenity

Policy Position

Local Plan Policy LP 8 states all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining, and neighbouring properties.

The Council will ensure:

- The design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible; and,
- The proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure.

Policy Justification

The approved single storey rear extension does not project beyond the rear elevation of No. 21 Queens Road and there are no windows in the side elevation of No. 21. It was previously held by the Council that the side extensions 'will have a neutral impact on the neighbouring occupiers.'

While the increase in height of the side extension would be apparent from the rear garden of No. 21, given its siting, it is not considered that this would result in material harm to the amenity that occupants of the property enjoy by way of appearing unreasonably intrusive, overbearing, or resulting in a loss of light.

As a result, the Proposal would comply with the objectives of Local Plan Policy LP 8.

iii. Other Material Matters

The proposed alterations to the side extension would not have a detrimental impact on trees, the sustainability objectives set out, highway conditions or flood risk.

5. CONCLUSIONS

For the reasons set out above, it is not considered that the minor amendment to the approved side extension would detract from the character and appearance of the BTM and conservation area and the amenity enjoyed by occupants of neighboring properties will continue to be preserved.

I trust this letter is satisfactory for the registration and validation of the Application and I look forward to receiving an acknowledgement of this letter shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,

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Director

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