



Land to the rear of 50 Station Road, London SW13 0LP
Planning and Heritage Statement
December 2024

1.0 INTRODUCTION

- 1.1 This Planning and Heritage Statement has been prepared by SY2 Planning on behalf of Angela MacDonald and Jean Luc Delagree to support an application for planning permission and conservation area consent (demolition in a conservation area) for the subdivision of the garden to the rear of 50 Station Road; demolition of the existing garage fronting onto Ellison Road; and the erection of a new dwelling. The proposed house comprises a two storey 3 bedroom/5 person family dwelling with one off street car parking space. The ground floor of the property will be raised, to comply with flood risk policy. The rear single storey area of the house (kitchen/living/diner) will have a flat green roof, which will contribute to the biodiversity of the site and also provide an opportunity for SUDS.



Figure 1: The proposed new house fronting onto Elliston Road

- 1.2 Planning permission and conservation area consent is sought for:

Subdivision of the plot, demolition of the existing garage and the construction of a 3 bed/5 person house, with one off street parking space, landscaping, bin storage and cycle storage.

- 1.3 The application site comprises a single storey garage with fronts onto Ellison Road and garden land to the rear of number 50 Station Road, which is a two-storey building, with commercial at the ground floor and residential above, which is part of a terrace on the west side of Station Road.
- 1.4 This Planning and Heritage Statement summarises the proposed scheme and sets out

the context of the site and relevant planning policy. It then summarises the technical assessments undertaken and sets out the key planning considerations. It also incorporates a Heritage Assessment.

1.5 In support of the planning application the following information is being submitted:

- This Planning and Heritage Statement prepared by SY2 Planning;
- Design and Access Statement prepared by Paper Projects;
- Flood Risk Assessment and Drainage Strategy prepared by Herington Consulting;
- Tree Survey prepared by MF Tree Consultants;
- Arboricultural Impact Assessment prepared by MF Tree Consultants;
- Ecological Impact Assessment prepared by Morgan and Stuckey;
- Bio Diversity Net Gain Matrix and Report prepared by Morgan and Stuckey;
- Energy and Sustainability Statement prepared by Ecolyptik;
- Sustainable Construction Checklist prepared by Ecolyptik;
- Daylight/Sunlight Assessment (Neighbouring Properties) prepared by Ecolyptik;
- Daylight/Sunlight Assessment (Proposed Scheme) prepared by Ecolyptik;
- Fire Safety Statement (please see Section 4.15 of DAS);
- Inclusive Access Statement (please see Section 4.6 of DAS);
- Details of cycle and bin stores (please see Section 4 of DAS);
- Landscaping details including tree planting scheme (please see Section 4.17 of the DAS);
- National Water Standards Statement (please see Section 4.5 of Energy and Sustainability Statement);
- Construction Management Plan prepared by Andrew Goddard Associates Limited;
- Traffic Management Plan prepared by Andrew Goddard Associates; and
- Viability Assessment/Affordable Housing Commuted Sum Spreadsheet prepared by Rapleys

1.6 The following drawings are provided with the planning application:

- 23581 PL 001 Location Plan
- 23581 PL 010 Site Plan
- 49076 01 PA Existing Site Plan and Demolition Plan
- 23581 PL 011 Proposed Ground Floor Plan
- 23581 PL 012 Proposed First Floor Plan
- 23581 PL 013 Proposed Roof Plan
- 23581 PL 020 Proposed Front Elevation
- 23581 PL 021 Proposed North Elevation
- 23581 PL 022 Proposed Rear Elevation
- 23581 PL 023 Proposed South Elevation
- 23581 PL 030 Proposed Site Section

2.0 SITE AND SURROUNDING AREA

The Application Site



Figure 2: Site location

- 2.1 The application site is located on the west side of Station Road. It comprises 50 Station Road, which is a two-storey late eighteenth century/ early nineteenth century property, with commercial at ground floor and residential above, with a large rear garden. The rear garden is a long southwest facing mature garden which joins with Ellison Road. There is a side alleyway which provides access to a studio building within the garden of number 52 Station Road and to the garden at 5 Ellison Road.



Figure 3: Rear garden of 50 Station Road

- 2.2 There is a single storey garage at the west end of the garden, fronting Ellison Road.

The garage is constructed from breezeblock with exterior rendering with a single up and over door and a flat roof covered in bitumen felt. There are currently two car parking spaces in front of the garage. There are mature trees within the garden.



Figure 4: Existing garage fronting onto Ellison Road and the rear of the garage

- 2.3 The site is located within the Barnes Green Conservation Area and number 50 Station Road is identified as a Building of Townscape merit within the Conservation Area Statement. However, the garage site is acknowledged in the pre-application advice to make a limited contribution to the character or appearance of the conservation area. The Richmond Local Plan Proposals Map identifies that the site is in a View Protected Indicative Zone (Richmond Park towards St Paul's Cathedral). The site is within Flood Zone 3. The site has a PTAL of 3 (good). The train station is approximately 0.4 miles/nine minutes' walk away. A number of buses serve the area: 209, 283, 378, 485, 609, 969 and N22.

Surrounding Area



Figure 5: Immediate adjoining properties on Ellison Road

- 2.4 The surrounding area is predominantly two storey residential properties, with pitched roofs. There are some taller buildings along Station Road. Number 1 Ellison Road was originally constructed as a workman's institute and was later used as a library before

being converted into six flats. The building is a simple large, brick barn-like form with two lower connected wings facing onto Cleveland Road. Number 5 Ellison Road, dates from the mid-1980's and incorporates a workshop at ground floor. Further analysis of the local area is provided in the Design and Access Statement.

- 2.5 To the east of Station Road is Barnes Green. The Barnes Green Conservation Area was designated in 1969 and extended to include Station Road in 1982. Properties on Ellison Road to the south of the site are outside of the conservation area.



Figure 6: Surrounding context

Planning History

- 2.6 A review of the Council's on-line planning history has identified the following planning history of relevance:

50 Station Road

- 75/326TP - Change of use of part of the ground floor from residential to shop area and erection of a single storey rear extension for residential use. (granted 29 April 1975);
- 75/0922: Erection of a dormer window – granted 26 November 1975; and
- 02/T0646; 02/T2062; and 02/T2063 - Various applications for tree works.

3.0 PRE-APPLICATION ADVICE

Introduction



Figure 7: Pre-Application Proposals

3.1 Pre-application advice was sought for a three storey four bed/ 8 person house with rear garden and parking to the front. Pre-application advice was received on 17 May 2024 which confirmed that there was no “in principle” objection to the proposal.



Figure 8: Pre-Application Scheme Floor Plans

3.2 No objections were raised to the demolition of the garage. The advice generally supported the principle of a new house on the site in the proposed location, subject to certain design changes.

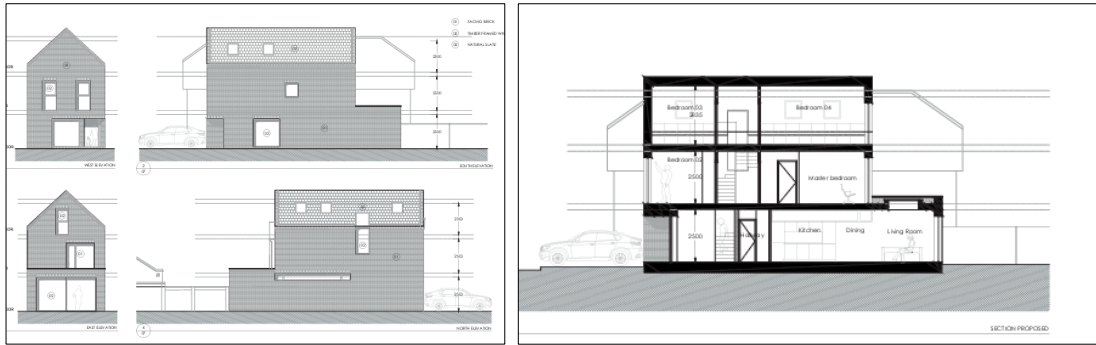


Figure 9: Pre-Application Scheme Elevations and Sections

The Pre-Application Advice



Figure 10: Pre-Application Scheme within the streetscene

Principle of Development

- 3.3 *Given that the application seeks the provision of a residential dwelling sited within a predominantly residential area, it is considered that the principle of residential development is acceptable subject to compliance with relevant provisions of the development plan and other material planning considerations. The proposed dwelling would contribute to the borough's housing targets and would make effective and efficient use of a currently unattractive and underutilised space. The proposal provides a family sized dwelling, the proposal is not located within one of the five main centres within the borough or an area of mixed use, as such the scheme is in line with part A of LP35 of the Local Plan.*

Design and layout

- 3.4 *The design, height and form of the proposed house needs to be respectful to the prevailing character of Ellison Road, not just the areas included in the conservation*

area but those properties immediately to the south-east. The height appears taller than the terraces and the use of the front gable makes it appear overly prominent in the street scene. This roof form is rather alien in this location and results in the building appearing to physically assert itself on the street scene despite the building being on the same building line. The building also appears to extend deeply into the plot which, due to the space between the former Institute and the application site, results in a very dominant flank wall as ones enters Ellison Road with little visual relief other than a side window.

- 3.5 *Overall, the introduction of new built form in the location of the garage could be supported but the current design, scale and form is entirely at odds with the prevailing character of the street and the immediately surrounding buildings. The building is too large and dominant and the use of a front facing gable will be totally out of place in this context. Materials are also a concern therefore it is strongly urged that the design is reviewed and revised, following a full contextual study of the surrounding area.*

Other matters

- 3.6 The proposal provides an adequate outdoor amenity area as shown on drawing number 23581_P_06A.
- 3.7 The applicant is advised to submit evidence to demonstrate compliance with the internal daylight requirements set out in BS EN 17037 (2018) for all habitable rooms.
- 3.8 The site has a PTAL score of 3. Policy requires up to 1 car parking space for such a dwelling. A minimum of two secure, covered cycle spaces should be provided.
- 3.9 A detailed Construction Management Plan will be required.
- 3.10 No in-principle objections are raised in terms of ecology, however due to the amount of vegetation and presence of nearby bat and house sparrow records, any application should be accompanied by a PEA.
- 3.11 It is necessary to identify trees that will be affected by development. The Council will require a tree-by-tree "Full" CAVAT valuation.
- 3.12 The application site is situated in flood zones 2, 3 & 3a, as well as an area susceptible to surface water flooding, as such a flood risk assessment commensurate to the scale of the scheme will be required. The Flood Risk Assessment must address the requirement for a sequential test and exception test.

- 3.13 Development of one dwelling unit is required to incorporate measures to improve energy conservation and efficiency, as well as contributions to renewable and low carbon energy generation. Proposals must demonstrate that the scheme achieves a 35% carbon emissions reduction target beyond Part L 2021 of the Building Regulations. An Energy Report will be required to demonstrate compliance.
- 3.14 There will be a requirement for 5% affordable housing. The applicant should provide an affordable housing commuted sum spreadsheet with any full application.
- 3.15 In terms of fire safety, there is a requirement to submit documentation in order to comply with the requirements as set out under Policy D12 of the London Plan (2021).
- 3.16 There is a requirement to provide a biodiversity metric and a plan showing post-development BNH habitats.

Summary and Conclusion

- 3.17 *There are no in-principle objections to the introduction of a new dwelling in the location of the existing garage. However, the current design, scale and form is entirely at odds with the prevailing character of the street and the immediately surrounding buildings. The building is too large and dominant and the use of a front facing gable will be totally out of place in this context. Materials are also of concern. The design should be reviewed and revised, following a full contextual study of the surrounding area.*

4.0 THE APPLICATION PROPOSALS

Introduction

- 4.1 The proposed scheme is for a high quality 3-bed/5 person house of 113.5 sqm on the garden area to the rear of 50 Station Road, making use of the site of the former garage, which will be demolished. A contemporary design is proposed. Access into the property will be from Ellison Road. The proposal will improve the street scene and Conservation Area by removing the poor quality garage structure and concrete hardstanding. The choice of materials will reflect the character of the existing properties on Ellison Road. The proposed scheme has been designed to provide M4 (1) for access into the dwelling and M4 (2) within the dwelling. The scheme has been reduced from a three storey house to two storeys; and the height and length of the proposed house has also been reduced in order to minimise any potential impact on the neighbouring gardens.



Figure 11: Front elevation and proposed block plan

Proposed Layout

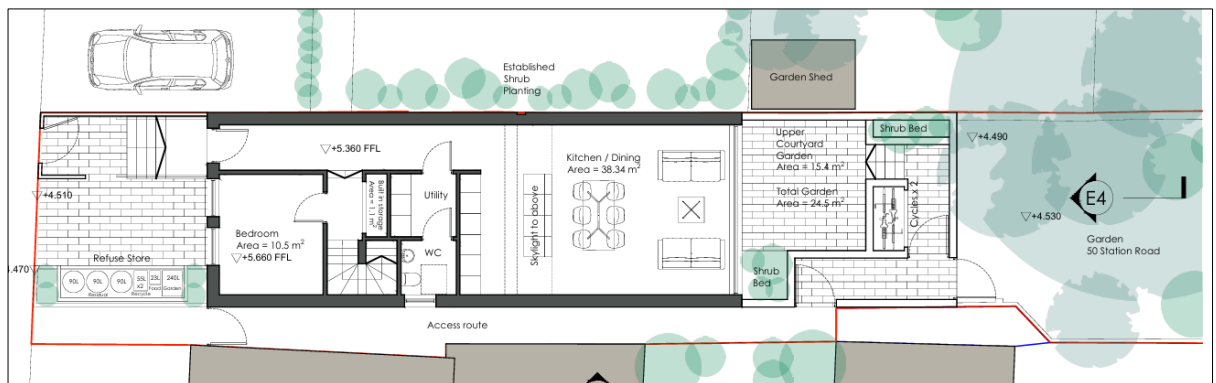


Figure 12: Ground floor plan

- 4.2 The proposed house has been carefully designed to minimise any overlooking and loss of daylight/sunlight to the adjoining properties. As the site is within a flood risk zone, the levels of the new habitable rooms have been designed to offset this risk. The access route to the south of the site has been retained as a right of way to number 52 Station Road. The house meets London Plan standards.
- 4.3 At ground floor level there is a bedroom fronting onto Ellison Road and a kitchen dining area facing onto the rear courtyard garden. The courtyard garden will be raised to allow for level access from the living space, with steps down to a cycle store.

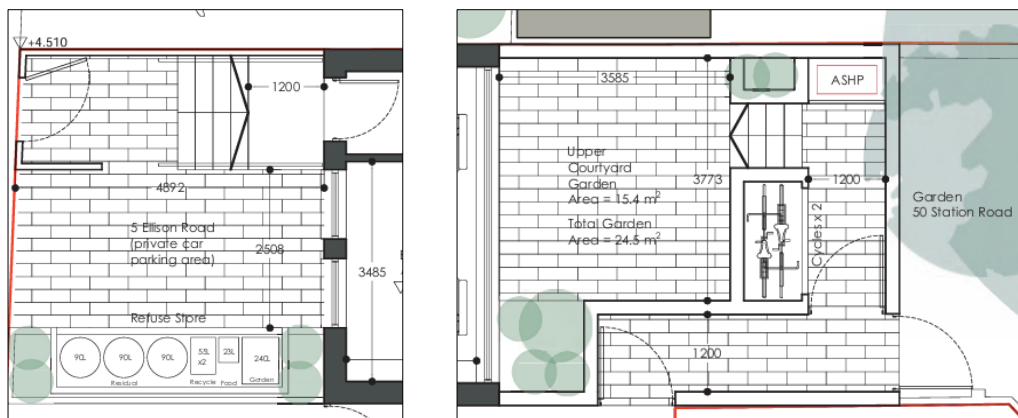


Figure 13: Detail of front amenity area and rear courtyard garden

- 4.4 At the front of the property, the amenity space is divided between a car parking space, access for bins and the route to the front door, via a stepped access. High quality stone paving will be used. A wildflower/green roof will be provided above the refuse store.



Figure 14: First Floor Plan

- 4.5 There are two bedrooms at first floor level, with an internal bathroom. To the rear of the property is a green roof area, which will be planted as a green/ wildflower roof. The

integration of green roofs will provide surface water attenuation, and a comprehensive Sustainable Urban Drainage Strategy has been prepared for the development. Skylights will be installed to increase the light into the bathroom.

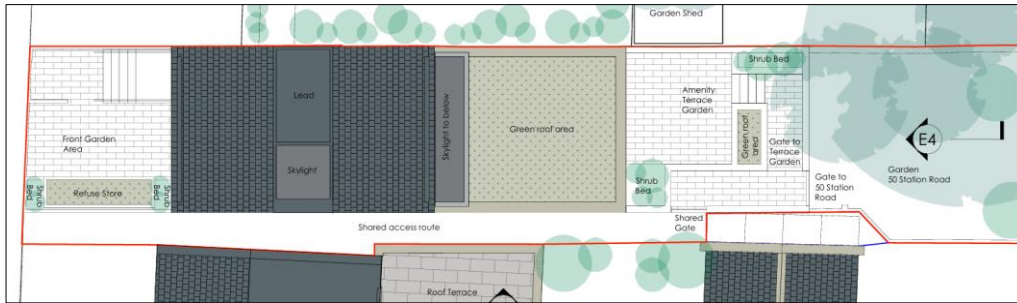


Figure 15: Roof Plan

Scale and massing

- 4.6 In response to the comments received at the pre-application stage, the scale of the house has been reduced and the roof form has been designed to reflect the profile of the existing terrace.

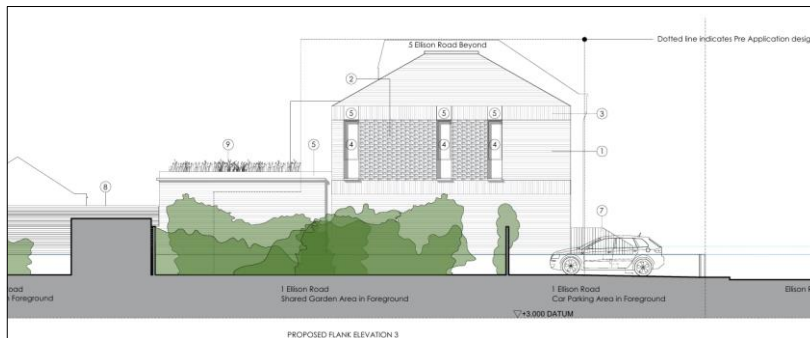


Figure 16: The north elevation

- 4.7 The floor level of the proposed dwelling will be elevated above the maximum predicted flood level on site. During a breach in the Thames tidal flood defences, the site could be subject flooding. As such, the floor levels will be raised to meet the EA's floor level requirements of 300mm above the flood level for living accommodation and 600mm above the flood level for sleeping accommodation.

4.8

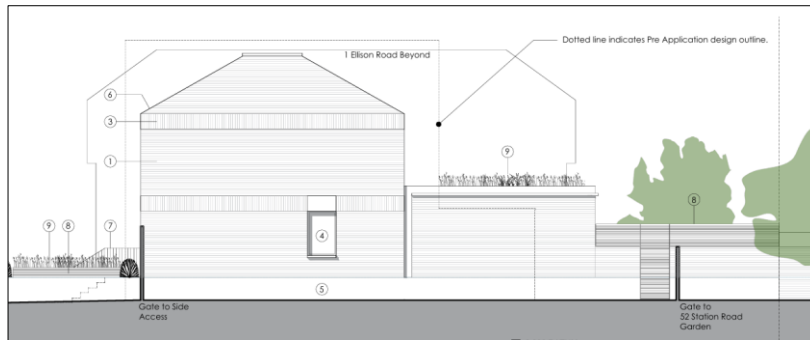


Figure 17: The south elevation

Materials

4.9

It is proposed to use a colour palette of earth tones, taken from the historic context. Special brick detailing with soldier coursing and hit and miss brick panelling will be used to pick up on brick patterning used in the surrounding context. Stone panels will be introduced over window and door heads in order to pick up on stone details from the surrounding Victorian houses but used in a contemporary expression. Metal railings will be painted to match the colour of the stone panelling. The roof finish will be a natural slate tile roof. Further details are provided in the Design and Access Statement.

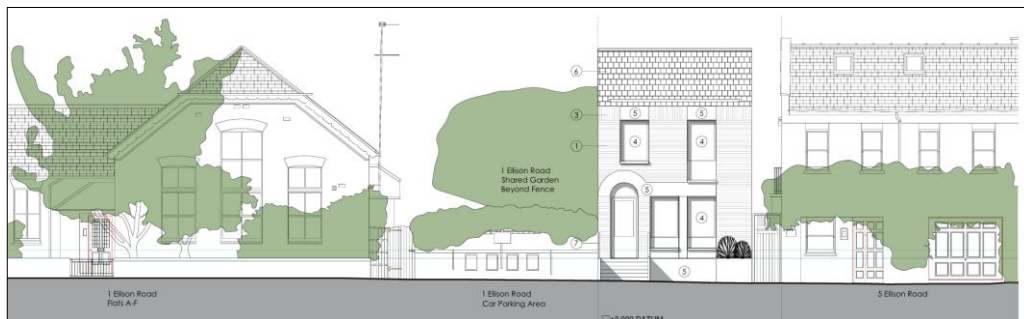


Figure 18: The front elevation

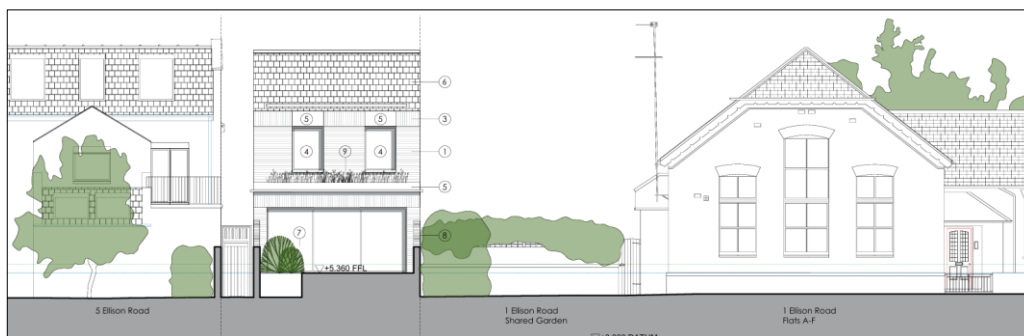


Figure 19: The rear elevation

Energy Strategy

- 4.10 Measures will be introduced to improve energy conservation and efficiency, as well as contribute renewable and low carbon energy generation. A 35% carbon emissions reduction beyond Part L 2021 of the Building Regulations has been incorporated within the design and is demonstrated within the accompanying Energy Report. The proposed development includes active energy production with Air Source Heat Pump technology combined with passive energy reduction measures with a fabric first approach.

5.0 PLANNING POLICY

5.1 The Statutory Development Plan is the London Plan (2021) and the Richmond Adopted Local Plan (2018). The National Planning Policy Framework (2023) is a material consideration, as is the Regulation 19 Richmond Local Plan (2023).

National Planning Policy Framework (2023)

5.2 The NPPF (2023) sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. Whilst not prescriptive, the NPPF is material to the consideration of all planning proposals; setting the framework for policy making and development control and seeking to put into place a positive approach to development. There is a presumption in favour of sustainable development and Chapter 2 of the NPPF highlights the importance of the planning system in achieving sustainable development, which involves achieving the three overarching objectives of providing an economic benefit, a social benefit and an environmental benefit. For plan making this involves seeking opportunities which meet the developments needs of their area and for decision taking, this means approving development proposals which comply with up-to-date development plans without delay. Paragraph 123 of the NPPF notes that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

5.3 Chapter 5 of the NPPF (Delivering a sufficient supply of homes) states at paragraph 60 that *"...it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

5.4 In regard to promoting sustainable transport, paragraph 109 of the NPPF states that *"significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*

5.5 Chapter 11 (Making effective use of land) notes at paragraph 123 that *"planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses...; and paragraph 124 states that "planning policies and decisions should..(c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.."*

- 5.6 Paragraph 128 of the NPPF states that *“planning policies and decisions should support development that makes efficient use of land, taking into account:*
- a) *the identified need of different types of housing and other forms of development;*
 - b) *local market conditions and viability;*
 - c) *the availability and capacity of infrastructure services...;*
 - d) *the desirability of maintaining an area’s prevailing character and setting...; and.*
 - e) *the importance of securing well-designed and beautiful, attractive and healthy places.*
- 5.7 Chapter 12: Achieving Well-Designed Places establishes national policy guidance on the design of the built environment. Paragraph 131 states that *“the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 5.8 Paragraph 135 then notes that *“planning policies and decisions should ensure that developments a) will function well and add to the overall quality of the area..; b) are visually attractive..; c) are sympathetic to local character and history..; d) establish or maintain a strong sense of place..; e) optimise the potential of the site..; and f) create places that are safe, inclusive and accessible..*
- 5.9 Section 16 of the NPPF deals with conserving and enhancing the historic environment. Paragraph 203 states that *“in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.”*
- 5.10 Paragraph 207 of the NPPF states that *“where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss”*. A public benefit is defined as anything that delivers economic, social or environmental progress.
- 5.11 Paragraph 208 then notes that *“where a development proposal will lead to less than*

substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

London Plan (2021)

5.12 The London Plan 2021 is the Spatial Development Strategy for Greater London and sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth. Local Plans are required to be in ‘general conformity’ with the London Plan.

5.13 **Policy GG2: Making the best use of land** identifies that developments must enable use of brownfield sites and maximise higher density in areas which are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

5.14 **Policy D1: London’s form, character and capacity for growth** and **Policy D2: Infrastructure requirements for sustainable densities** recognise the importance of understanding different areas’ capacity for growth and the need to respect existing urban form and the capacity of existing and planned physical, environmental and social infrastructure to support development.

5.15 **Policy D3: Optimising site capacity through the design-led approach** requires that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. A design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity. Any proposals should enhance local context, be of high quality and respond to the existing character of a place.

5.16 **Policy D5: Inclusive Design** states:

B Development proposal should achieve the highest standards of accessible and inclusive design. They should:

- 1) be designed taking into account London’s diverse population*
- 2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion*
- 3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment*
- 4) be able to be entered, used and exited safely, easily and with dignity for all*

5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

- 5.17 **Policy D6: Housing quality and standards** requires housing developments to provide adequately designed rooms with functional layouts without differentiating between tenures. Housing development should maximise the provision of dual aspects dwellings and meet the space standards are set out in Table 3.1 of the London Plan. **Policy D7: Accessible Housing** requires residential developments to ensure that at least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and that all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 5.18 **Policy H1: Increasing Housing Supply** states that in order to ensure that the ten-year housing targets are met, boroughs should optimise the potential for housing delivery on all suitable brownfield sites.
- 5.19 **Policy H10: Housing size mix** promotes a range of different unit sizes. Policy H10 also recognises the need to take account of the nature and location of the site "*with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity*".
- 5.20 **Policy D14: Noise** requires residential development proposals to manage noise by avoiding significant adverse noise impacts on health and quality of life, by improving and enhancing the acoustic environment and promoting appropriate soundscapes. **Policy SI1: Improving air quality** requires development proposals to seek opportunities to identify and deliver further improvements to air quality; whilst **Policy SI2: Minimising greenhouse gas emissions** requires major developments to be net zero carbon. **Policy SI13: Sustainable Drainage** states that development proposals should aim to achieve the greenfield run-off rates and manage surface water run-off as close to its source as possible.
- 5.21 **Policy T4: Assessing and mitigating transport impacts** requires a transport assessment/statement to be submitted with larger development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. The cumulative impacts of development on public transport and the road

network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

5.22 **Policy T6: Car parking** states:

A) *Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.*

B) *Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.*

Richmond Adopted Local Plan (2018)

5.23 **Policy LP 1: Local Character and Design Quality** states that the Council will require all development to be of high architectural and urban design quality. 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 Policy states that *“to ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals: 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing; 2. sustainable design and construction, including adaptability, subject to aesthetic considerations; 3. layout, siting and access, including making best use of land; 4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features; 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.”*

5.24 **Policy LP 3: Designated Heritage Asset** states at paragraph A 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. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:

C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area

E. ... The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.

- 5.25 Paragraph 4.3.1 notes that the borough is characterised by primarily low to medium-rise residential patterns, which has produced very attractive townscapes and is important to the borough's distinctive character. Paragraph 4.3.4 goes on to state that *"new developments of an exceptional design, which respond to their local and historic context, can make a very positive contribution to the historic environment. It is important to retain not only the character, distinctiveness and setting of designated heritage assets within a Conservation Area, but also the interrelationship between buildings, how they relate to surrounding spaces and areas as well as whole or partial street views, including into and out of a designated area, park, garden or landscape."*
- 5.26 **Policy LP4: Non-Designated heritage Assets** states that the Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit.
- 5.27 **Policy LP 5: Views and Vistas** states that the Council will *"protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means: 1. protect the quality of the views and vistas as identified on the Policies Map...6. seek improvements to views within Conservation Areas, which: a. are identified in Conservation Area Statements and Studies and Village Plans; b. are within, into, and out of Conservation Areas; c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings"*.
- 5.28 **Policy LP 8: Amenity and Living Conditions** requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The design and layout of buildings should enable good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; and ensure no unacceptable overlooking or noise.

- 5.29 **Policy LP 10: Local Environmental Impacts, Pollution and Land Contamination** seeks to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.
- 5.30 **Policy LP 15: Biodiversity** notes that the Council will protect and enhance the borough's biodiversity and support enhancements to biodiversity.
- 5.31 **Policy LP 16: Trees, Woodland and Landscape** protects existing trees and requires 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.
- 5.32 **Policy LP 20: Climate Change Adaptation** promotes and encourages development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property. This includes minimising the effects of overheating and minimising energy consumption.
- 5.33 **Part A of Policy LP 21: Flood Risk and Sustainable Drainage** 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 account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied.
- 5.34 **Policy LP 22: Sustainable Design and Construction** states at part A that developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to complete the Sustainable Construction Checklist SPD. Part B requires developers to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation.
- 5.35 **Policy LP 24: Waste Management** requires all developments to provide adequate refuse and recycling storage space and facilities, which should be sensitively integrated within the overall design of the scheme.
- 5.36 **Policy LP 34: New Housing** sets a Borough target of 3,150 homes for the period 2015-2025.

5.37 **Policy LP35: Housing Mix and standards** states that development should generally provide family sized accommodation. All new housing development is required to comply with the Nationally Described Space Standard. All new housing development should provide adequate external space. 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'.

5.38 **Policy LP 36: Affordable Housing** states that a contribution towards affordable housing will be expected on all housing sites. On sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD. For a single house this is 5%.

5.39 **Policy LP 39: Infill, Back land and Back Garden Development** states:

Infill and Back land Development

A. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:

- 1. Retain plots of sufficient width for adequate separation between dwellings;*
- 2. Retain similar spacing between new buildings to any established spacing;*
- 3. Retain appropriate garden space for adjacent dwellings;*
- 4. Respect the local context, in accordance with policy LP 2 Building Heights;*
- 5. Enhance the street frontage (where applicable) taking account of local character;*
- 6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;*
- 7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;*
- 8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;*
- 9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;*
- 10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.*

Back garden Development

B. There is a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. Back garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained. In some cases, a limited scale of back garden development may be considered acceptable if it complies with the factors set out in A above. Development on backgarden sites must be more intimate in scale and lower than frontage properties

- 5.40 The supporting text at paragraph 9.6.5 states that “*most backland development in the borough involves loss of garden land. In general, the Council will not accept proposals for developments on back garden land but proposals for development of backland sites in other uses will be considered subject to the criteria above and other relevant policies.*”
- 5.41 Paragraph 9.6.6 continues that “*the restrictive approach reflects the direct and indirect value of gardens contributing to local character, providing safe and secure amenity and play space, supporting biodiversity, helping to reduce flood risk and mitigating the effects of climate change including the heat island effect.*”
- 5.42 Paragraph 9.6.7 acknowledges that “*housing delivery from backgarden land is not needed to meet the borough's strategic housing targets. The Council will restrict garden development where gardens make a significant contribution to local character, ecology and/or the general environment. In assessing local ecological value, the Council will take into account the length and overall size of the gardens and value of adjacent land as larger areas support a wider range and number of species. Gardens are also important in establishing the character of certain parts of the borough... However, this consideration will need to be made on a case by case basis. These factors mean that developments that involve a significant loss of garden land will normally be unacceptable.*”
- 5.43 **Policy LP 44: Sustainable Travel Choices** encourages high trip generating development to be located in areas with good public transport; and requires new development to be designed to maximise permeability.
- 5.44 **Policy LP 45: Parking Standards and Servicing** requires new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel. The policy resists the

provision of front garden car parking unless it can be demonstrated that: a. there would be no material impact on road or pedestrian safety; b. there would be no harmful impact on the character of the area, including the streetscape or setting of the property, in line with the policies on Local Character and Design; and c. the existing on-street demand is less than available capacity.

Richmond Publication Local Plan (Regulation 19)

- 5.45 The emerging local plan was consulted on in June 2023. Key draft policies of note are Policy 28 Local Character and Design Quality (Strategic Policy), Policy 29 Designated Heritage Assets and Policy 39 Biodiversity and Geodiversity. The Regulation 19 Richmond Local Plan was submitted to the Planning Inspectorate in January 2024 and was the subject of an Examination in July 2024. It is due to be adopted in late 2024/early 2025.

Policy 11: Affordable Housing (Strategic Policy)

- 5.46 A. All new housing developments in the borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.
- 5.47 B. A contribution towards affordable housing will be expected on all housing sites. The following requirements apply: 1. On all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved. 2. On all other sites capable of ten or more units gross 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved. 3. On sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD.
- 5.48 **Policy 12: Housing Needs of Different Groups** states at part B. *Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies. 1. All residential uses are expected to contribute to the highest priority affordable housing needs as set out in Policy 11 'Affordable Housing (Strategic Policy) ', and contribute to creating mixed, balanced and inclusive*

communities. The highest priority is for on-site general needs affordable housing. 2. All residential uses should demonstrate how higher standards of accessible and inclusive design have been met.

- 5.49 **Policy 13: Housing Mix and Standards** notes at Part A. Development should generally provide a mix of sizes and types of accommodation. Areas within PTALs 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds). For market housing, there is highest demand for 2 and 3 beds.
- 5.50 **Part A of Policy 15: Infill and Backland Development** states Proposals are expected to optimise the potential for housing delivery on all suitable and available brownfield sites in accordance with London Plan Policy H1. This includes: 1. sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a tube/rail station or town centre boundary (referred to as Areas for Intensification); and 5. small sites, in accordance with Policy 16 'Small Sites'.
- 5.51 Part B of Policy 15 notes that Policy 28 'Local Character and Design Quality (Strategic Policy)' and Policy 44 'Design Process' require all proposals to follow a character- and design-led approach to site optimisation. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed: 1. Retain plots of sufficient width for adequate separation between dwellings; 2. Retain similar spacing between new buildings to any established spacing; 3. Retain appropriate garden space for adjacent dwellings; 4. Respect the local context, in accordance with Policy 28 'Local Character and Design Quality (Strategic Policy)'; 5. Enhance the street frontage (where applicable) taking account of local character; 6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with Policy 28 'Local Character and Design Quality (Strategic Policy)'; 7. Retain or re-provide features important to character, appearance or wildlife, in accordance with Policy 42 'Trees, Woodland and Landscape'; 8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with Policy 46 'Amenity and Living Conditions'; 9. Provide adequate servicing, recycling and refuse storage as well as cycle parking; 10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking; and 11. Result in no significant loss of garden land, unless in some cases a well-designed backgarden development at an intimate scale with appropriate mitigation such as to improve

biodiversity, accords with all the factors above and there is no identified harm to the local area.

5.52 **Part A of Policy 16: Small Sites** notes that the Council will support the delivery of the small sites target of 234 new homes per annum in accordance with London Plan Policy H2. Part C requires proposals for small sites to have regard to the existing townscape character; while part D states that the Council will support proposals for well-designed new homes on small sites (up to 0.25 hectares) to meet local needs. Part 7 notes the requirement to ensure the scale, height, massing, density, proportions, form, materials and detailing are appropriate to the site and its context.

5.53 **Part A of Policy 28: Local Character and Design Quality** (Strategic Policy) states: *“The Council will require all development to be of high architectural and urban design quality. 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.”*

5.54 Part B states: *To ensure development respects, contributes to and maximises opportunities to enhance the local environment and character, proposals must reflect and demonstrate the following principles:*

- 1. Ensure the proposal is 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;*
- 2. Ensure the development provides a high-quality sustainable design, construction and layout, including adaptability to climate change whilst responding positively to the local character as identified in the Urban Design Study and Conservation Area Appraisals/Statements;*
- 3. Use a design-led approach to optimise the potential of a development site through layout, siting and access arrangements, to ensure the development integrates positively with its surroundings;*
- 4. Ensure the development takes account of the existing urban grain and development patterns, including relationship of heights to widths....*

5.55 **Part A of Policy 29: Designated Heritage Assets** 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. The significance (including the settings) of the borough's designated heritage assets,*

encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Garden will be conserved and enhanced..”

- 5.56 Part C requires all proposals in Conservation Areas to preserve and, where possible, enhance the character or the appearance of the Conservation Area.
- 5.57 **Policy 38: Urban Greening** requires all development proposals to integrate green infrastructure and provide for urban greening. It is necessary to consider green infrastructure at an early stage of the design process and incorporate this as part of an integrated design approach. Part E states that Biodiverse green roofs should be incorporated into developments with roof plate areas of 100sqm or more, where technically feasible. At least 70% of any potential roof plate area should be used as a biodiverse green roof.
- 5.58 **Policy 39: Biodiversity and Geodiversity** promotes the protection and enhancement of the boroughs’ biodiversity and geodiversity. Of key note are:
- 5. requiring the following development proposals to provide a measurable 20% net gain for biodiversity, in line with the latest available version of the DEFRA metric: a. small-scale householder applications which increase the footprint and/or floorspace of the existing dwelling; b. all development proposals, including conversions or changes of use, that result in 1 dwelling unit or more; c. non-residential development proposals which increase the footprint and/or floorspace;*
- 7. protecting back gardens from development which may destroy, impair, or harm their integrity; and removing Permitted Development Rights from new developments, including conversions and changes of use resulting in a new dwelling, for all proposals that require planning permission in order to protect rear and front residential garden spaces as a cumulative key wildlife habitat resource.*
- 5.59 **Policy 44: Design Process Optimising site capacity through the design-led approach** requires an evaluation of the attributes of the site as well as the surrounding context, character and capacity for growth.
- 5.60 **Policy 46: Amenity and Living Conditions** requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties and the visual amenity of the area as a whole. This includes ensuring adequate outlook and acceptable standards of privacy as well as ensuring acceptable daylight and sunlight.
- 5.61 **Policy 48: Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management** states at paragraph A that the Council will require new developments to make provision for the accommodation of vehicles to

provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land. Schemes are required to provide off-street vehicular and cycle parking.

6.0 HERITAGE ASSESSMENT

Introduction

6.1 The application site is located within the Barnes Green Conservation Area. Number 50 Station Road is identified as a building of townscape merit within the Conservation Area Statement. This section of the Planning and Heritage Statement sets out an Assessment of the Significance of the heritage asset and the impact of the proposed development.

Planning Policy and Guidance

6.2 The National Planning Policy Framework (NPPF) highlights the importance of understanding and describing the significance of heritage assets and using this understanding to inform development proposals.

6.3 The Historic Environment Good Practice Advice in Planning Note 2 paragraphs 8-10 provide further guidance when assessing the significance of a heritage asset.

- Understanding the nature of the significance is important to understanding the need for and best means of conservation.
- Understanding the extent of that significance is also important because it can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.
- Understanding the level of significance is important as it provides the essential guide to how the policies should be applied.

6.4 *Conservation Principles, Policies and Guidance* (Historic England, 2008) sets out English Heritage's approach in addressing the management of the historic environment and sets out the four main heritage values to consider when assessing the impact of development upon the historic environment. These are:

- Evidential value: the potential of a place to yield evidence about past human activity;
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative;

- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place; and
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

6.5 The scale below has been used to assess the significance of the application site;

- **High:** an aspect of value that strongly contributes to the significance of a place.
- **Medium:** an aspect of value that will have some cultural importance and will make a modest contribution to the significance of a place.
- **Low:** an aspect of value that will make a slight (yet still noteworthy) contribution to the significance of a place.

6.6 The DCLG Guidance Note – Historic Environment sets out that applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on its significance.

Historic Development and Character of the site and surrounding area

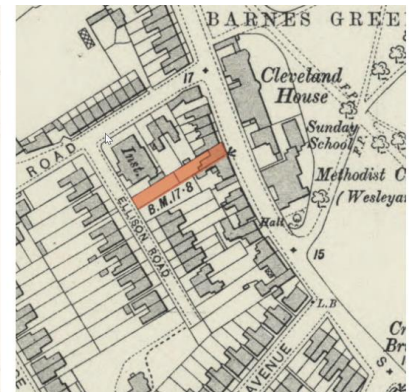
6.7 The historic plans included in the Design and Access Statement demonstrate how the application site and immediate surrounding area has changed over the past 150 years. The western side of Ellison Road was constructed by 1895 and the eastern side was generally developed from the beginning of C20. The adjacent property at number 5 Ellison Road was developed during the mid- 1980’s.



1870



1895



1913



1940

1951-1973

2024

- 6.8 Whilst the site itself is just within the Barnes Green Conservation Area, sites to the south of the application site on Ellison Road are outside of the Conservation Area.
- 6.9 A detailed analysis of the local character of the area is set out in Section 2.8 of the Design and Access Statement and demonstrates the variety of age and form of buildings in the vicinity of the application site.



Figure 20: Local Character

- 6.10 The overall character of the west side of Ellison Street is paired, semi-detached villas with shallow pitched slate roofs with a tall, shared chimney central to the roof and yellow brick facades.



Figure 21: 6 and 8 Ellison Road (west side)

- 6.11 The Edwardian houses on the east side of Ellison Street are typical of the period with pitched slate roofs, yellow brick facades with some small red brick detailing, bay windows at ground level and recessed porch front doors. No. 5 Ellison Road was constructed as a pastiche continuation of the existing Edwardian terrace in the mid 1980's. No. 1 Ellison Road was originally constructed as a workman's institute and later was used as a library before being converted into six flats.



Figure 22: 7 and 9 Ellison Road



Figure 23: 11 and 13 Ellison Road (east side)

Barnes Green Conservation Area



Figure 24: Extent of the conservation area with the site in red

6.12 Barnes Green Conservation Area was designated in 1969. The Conservation Area Statement notes that:

“The conservation area has been extended to include Cleveland Road and its row of Lion Houses, similar in design to those east of the Green. Between them and Station Road are houses in a variety of Victorian styles from 4 storey mansion blocks to two storey semi-detached villas. The street possesses strong architectural and environmental cohesiveness and being at right angles to Station Road relates well to the Green. It is an area of distinct identity, superior in form and architecture to surrounding development. Then to include the north eastern end of Stanton Road, characterised by small Victorian cottage type properties of simple appearance, and largely unaltered. It has strong architectural and physical cohesiveness. The area also includes a section bounded by Cleveland Road, The Maltings, Limes Avenue which is an enclave of Victorian workers’ cottages, small industrial buildings and a few earlier attractive cottage properties. The buildings are mostly unaltered and together form an easily identifiable group of great character, social and historical interest.”



Figure 25: 50 Station Road and adjoining properties

- 6.13 The application site forms part of character area 5: Victorian and Edwardian Residential. *“The Victorian and Edwardian residential character area comprises the bulk of the built environment of the Conservation Area outside of the historic core. Barnes underwent a small amount of residential development between 1850 and 1880, but it was the last decades of the 19th century and into the 20th century which saw massive development. This primarily occurred in the fields between Church Road, Rocks Lane and Station Road, with the loss of the big houses which previously dominated this area. The Lion Houses, built between 1899 and 1903 are the most distinctive of this development.”*
- 6.14 The area incorporates "40 and 42 Cleveland Road and 2 - 8 Ellison Road [which] form a small group of mid-19th century semi-detached houses. Built in stock brick with slate roofs and single storey canted bay windows, they are of a simple but elegant design compared to the more richly detailed later 19th century houses. All have a prominent central chimneystack and nos.2 - 8 additionally feature white-painted mullions to the bay windows. They contribute to the varied architectural character of Cleveland Road."



Figure 26: No. 1 Ellison Road

- 6.15 No.1 Ellison Road is contemporary with the rest of the development along Cleveland Road and was built as a 'Workmen's Institute', later becoming a Library by 1951. It is comprised of a central range, with two smaller wings to the north side, in stock brick with red brick detailing under a half-hipped slate roof.

The significance of the existing buildings

- 6.16 Number 50 Station Road is identified as being of townscape merit within the Conservation Area Statement and contributes to the character of the conservation area. It therefore has a **medium value**, in terms of contribution to the significance of a

place. In contrast, the garage to the rear of the site has a **low value** and is not considered to contribute to the conservation area or to the wider townscape..

The significance of the surrounding area

- 6.17 Part of Ellison Road (to the north of the application site) is located within the Barnes Green Conservation Area, whilst the southern part of Ellison Road is outside of the Conservation Area. A thorough analysis of the site context and existing views is provided in the Design and Access Statement. A number of buildings along Ellison Road are typical of the Victorian and Edwardian era that forms the general character of the wider conservation area and have a **medium value**.

Assessment of the impact of the proposed development on the identified heritage asset



Figure 27: Proposed scheme

- 6.18 The removal of the existing garage, which currently detracts from the conservation area and the streetscene on the east side of Ellison Road, will be beneficial. The proposed scheme has taken into account the scale, design language and materials of the surrounding properties and will help to preserve and enhance the character and appearance of the Conservation Area.

7.0 TECHNICAL ASSESSMENTS

7.1 A number of Assessments have been undertaken to support the Planning Application.

Design and Access Statement

7.2 A Design and Access Statement has been prepared by Paper Projects which details the site context and the proposals for the development of a new house. The Statement confirms that active and passive measures for fire prevention and means of escape are integrated into the design, in line with England and Wales Building Regulations Document B (Volume 1). The Statement provides a thorough analysis of the local context, which has helped to inform the design of the new house.

Flood Risk Assessment

7.3 A Flood Risk Assessment has been prepared by Herrington Consulting, which considers the risk of flooding across a wide range of sources. The site lies within Flood Zone 3 of the tidal reaches of the River Thames. It is located in an area classified as having a very low to low risk of surface water flooding, with the exception of a small area of shallow surface water accumulation within the garden of the existing dwelling. However, given the isolated nature of the accumulation, this would likely be down to rain falling on site and it is considered that the proposed SuDs features on site should capture this rainwater. As there are no records of surface water flooding in site, the risk of flooding from this source is considered to be low. Any potential risk from sewers and artificial sources is considered low. Table 3.1 of the FRA confirms that the risk from various sources of flooding is low.

7.4 The development site benefits from existing defence infrastructure along the River Thames, which provide a 1 in 1000 year standard of protection. In terms of residual flooding, the report notes that the maximum predicted flood level on site during a breach event is 5.06m AODN, which could result in floodwater reaching to a maximum depth of 0.55m.

7.5 As the construction of a new building within the floodplain has the potential to displace water and to increase the risk elsewhere by raising flood levels, a compensatory flood storage scheme is proposed to mitigate the potential impact.

7.6 The required floor levels are 5.36 AODN for living accommodation and 5.66m AODN for sleeping accommodation. These floor levels requirements will be met in the design

of the new building. Other proposed mitigation measures include constructing the ground floor using flood resistant and resilient design techniques; and a requirement to sign up to the EA's Flood Warning Service and Met Office Weather Warnings.

Sequential Test

7.7 Herrington Consulting has advised that a Sequential Test is not required as the application site meets the requirement of the Richmond Upon Thames Local Plan Publication (Regulation 19) June 2023 which states at paragraph 16.59 that “*the sequential test will not be required if the development proposal meets at least one of the following:*

- *It is within a town centre or local centre boundary;*
- *It is for residential development or a mixed use scheme and within the 800m buffer area identified within the town centre or local centre.”*

7.8 The application site is within 300m of the Barnes local centre and therefore Herrington have advised that a Sequential Test is not required.

Surface Water Drainage Strategy

7.9 The proposed scheme will increase the total impermeable area across the site and therefore the rate at which the surface water runoff is discharged from the site. A series of options have been considered including water re-use, infiltration, discharge to watercourses and discharge to public sewer system. The preferred solution is the use of water butts, a green roof and permeable surfacing system, which discharges to the public sewer, limiting the peak discharge rate to 1.8l/s. An indicative drainage layout plan is shown below, demonstrating how the proposed SuDS can be incorporated into the scheme proposals.

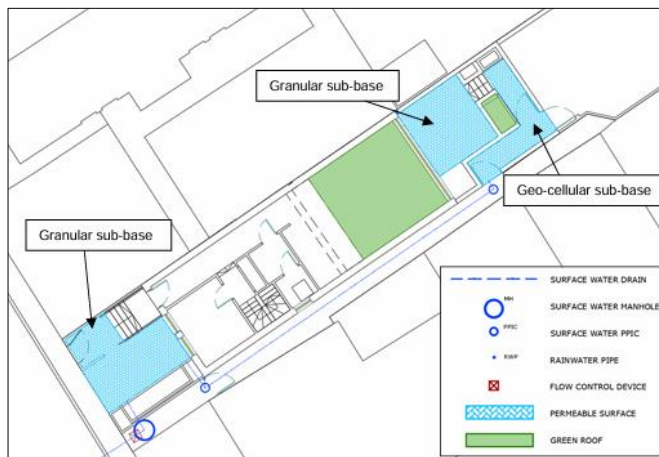


Figure 28: Proposed Drainage Strategy

7.10 The Assessment confirms that following the recommendations of the report, the occupants of the development will be safe and the development will not increase the risk of flooding elsewhere. Consequently, it has been demonstrated that the development can pass Part B of the Exception Test and will therefore meet the requirements of the NPPF.

Energy and Sustainability Statement

7.11 An Energy and Sustainability Strategy has been prepared by Ecolyptik in accordance with relevant policies within the London Plan and Richmond upon Thames Local Plan.

7.12 The objective of the Energy Strategy is to introduce measures to improve energy conservation and efficiency, as well as contribute renewable and low carbon energy generation. The proposed development includes active energy production with Air Source Heat Pump technology combined with passive energy reduction measures with a fabric first approach. By utilising the measures outlined for each stage of the Energy Hierarchy (Be Lean, Be Clean, Be Green), it is anticipated the proposed development will achieve a 64% reduction in regulated CO₂ emissions over the Part L 2021 notional building baseline.

7.13 A fabric first approach has been implemented to minimise unwanted heat loss through the building fabric and reduce heating energy demand.

7.14 Mechanical ventilation with heat recovery system is proposed to minimise ventilation heat losses during the winter months. The proposed dwelling will benefit from low air permeability reducing unintended ventilation heat losses through the building fabric. The targeted low air permeability for the scheme will enable the MVHR system to operate efficiently.

7.15 Further to this, although this is a minor scheme, the proposed development will also achieve a 17% improvement over the baseline by energy efficiency measures alone, exceeding GLA's target improvement of 10% for major residential development. It is therefore considered that there is no requirement for carbon offset payment.

7.16 The Sustainability Strategy incorporates the following measures:

1. Climate Resilience

- Solar control and natural ventilation are the main measures to mitigate overheating risk.

- Site at flood risk only during the unlikely event of a breach within the Thames tidal flood defences. Site will not increase flood risk elsewhere.
- Runoff will be managed through permeable surfacing in the parking and any hardstanding areas.
- Rainwater butt proposed for landscape irrigation.

2. Ecology and Biodiversity

- Planting will include wildflower green roofs over the living room, the cycle and bin stores and will focus on introducing new habitats to the site.
- Ecological enhancements will include installation of bird boxes, bug hotels, as well as open fronted and songbird boxes for nesting of common garden birds.

3. Sustainable Transport

- Cycle parking and off-street parking with EV charging will be provided to promote active travel and the uptake of electric vehicles. team's aspirations to meet and exceed planning policy requirements.

4. Energy and Carbon

- Fabric first approach to with high efficiency building fabric and systems to minimise energy demand.
- Heat pumps applied as low/zero carbon technologies. Energy strategy to achieve a 64% reduction in regulated CO2 emissions onsite, approaching zero carbon as far as possible on site.

5. Health and Wellbeing

- Daylight and sunlight levels within habitable spaces have been considered and optimised.
- Air, noise and light pollution from proposed development will be limited and mitigated.
- Private external amenity area is integrated into design for the enjoyment of residents.
- Scheme has been developed with safety and accessibility in mind.

6. Materials and Waste

- Materials will be responsibly sourced where feasible.
- Materials with low environmental impact and with recycled content will be prioritised.
- Construction and demolition waste will be limited through reduction/reuse/recycling measures.

7.17 A Sustainable Design and Construction Checklist has been submitted with the planning application. The proposed scheme will positively contribute to sustainability at the site and its surroundings.

Daylight Sunlight Assessment

- 7.18 Ecolyptik has prepared a Daylight/Sunlight Assessment for the scheme and for the potential impact of the scheme on neighbouring properties. (1 and 5 Ellison Road) and amenity spaces at 1 Ellison Road, 40 Cleveland Road and 5 Ellison Road.
- 7.19 The Daylight/Sunlight Assessment for the proposed scheme confirmed that all assessed spaces with windows within 90 degrees due south exceeded BRE's recommendations for sunlight. The rear garden was also found to achieve BRE's recommended sunlight hours on 21 of March. The proposed development complies with BRE's guidelines for daylight and sunlight access into the habitable spaces and open spaces. The assessment concluded that the scheme meets relevant policies and will provide a good quality of accommodation for the future residents from a daylight and sunlight perspective.
- 7.20 The Daylight/Sunlight Assessment for the neighbouring properties showed that the closest neighbouring windows and rooms that required detailed modelling will receive satisfactory levels of daylight and sunlight in line with BRE guidelines. All closest neighbouring amenity spaces were found to meet BRE's criteria for sunlight access. Overall, the proposed development at 50 Station Road will not result in any notable impacts on daylight and sunlight access to neighbouring properties.

Tree Survey

- 7.21 A tree survey was undertaken by Marcus Foster on 4 September 2024 and an Arboricultural Impact Assessment prepared, along with a CAVAT valuation of the trees to be lost and a new planting specification.

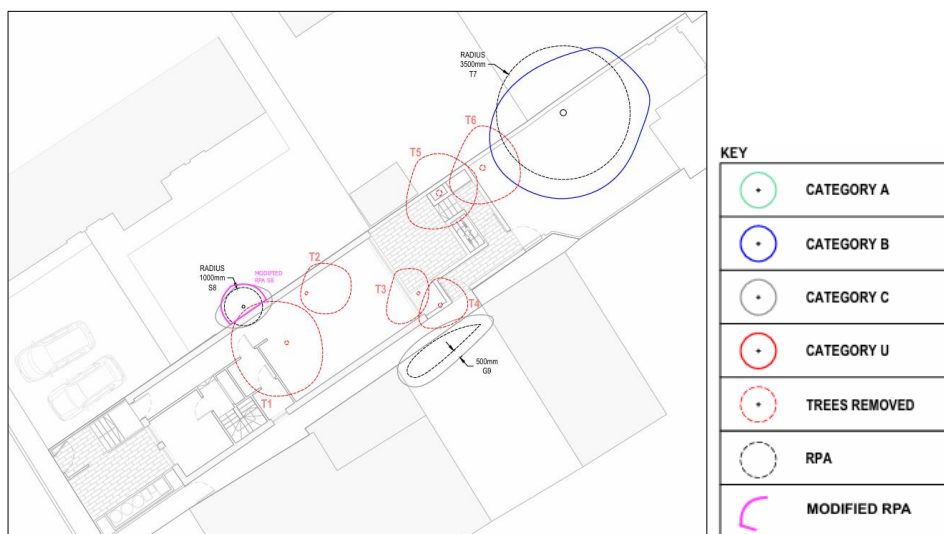




Figure 29: Existing trees

- 7.22 The survey identified that six trees, two shrubs and one group (T1-G9) are located within the site.
- 7.23 It is proposed to retain all 'B' category trees. Four 'C' category trees - T1, T2, T3, T5 are proposed to be removed, along with two shrubs S4 and S6.
- 7.24 The loss of four trees comprising four 'C' category trees are relevant for CAVAT valuation as per requirements set out within the London Plan. The 4 trees have been valued as follows at 10th November 2024: T1 - £2,037.00; T2 - £1,224.00; T3 - £612.00; and T5 - £612.00. The total CAVAT for the removed trees is therefore £4,485.00

TREE WORKS SCHEDULE 50 Station Road, London, SW13 0LP				
Tree No.	Common Name	BS5837 Category	Tree Works	Reasons for works
T1	Cockspur thorn	C	Fell to ground level and grind out stump	To facilitate development
T2	Apple	C	Fell to ground level and grind out stump	To facilitate development
T3	Bay laurel	C	Fell to ground level and grind out stump	To facilitate development
S4	Cherry laurel	C	Fell to ground level and grind out stump	To facilitate development
T5	Saucer magnolia	C	Fell to ground level and grind out stump	To facilitate development
S6	Pittosporum	C	Fell to ground level and grind out stump	To facilitate development
S8	Elder	C	Prune southern crown to boundary line pruning 1-1.5m branch lengths	To facilitate development

Figure 30: Proposed work schedule

- 7.25 The tree planting strategy will mitigate for those trees removed by providing replacement trees to directly replace the CAVAT valuation. The Landscape scheme provides further mitigation with enhanced shrub and soft landscape / planting areas.

Preliminary Ecological Assessment

- 7.26 Morgan and Stuckey have prepared a Preliminary Ecological Assessment following a site visit on 17 September 2024.

- 7.27 A review of the Multi-Agency Geographic Information for the Countryside (MAGIC) identified that Barn Elms Wetland Centre SSSI is located 1km north-east and the site falls within the SSSI Impact Risk Zone for Richmond Park (SSSI) ~2km south-west, Wimbledon Common (SSSI) ~3.1km south-east & Syon Park (SSSI) ~4km west. Three Natural England Protected Species licences (NEPS) for bats were granted within the search area. In addition, there are four Local Nature Reserves within the search area: Duke's Hollow ~549m west; Leg of Mutton Reservoir ~737m north; Chiswick Eyot ~1.6km north; and Barnes Common ~183m south-east. Richmond Park National Nature Reserve and Special Area of Conservation is located 2km south-west. There are a variety of priority habitats within the search area.
- 7.28 The Assessment found that there were no suitable roosting features within the garage or garden trees. The brick wall features a 'hedgehog highway' but otherwise there is no suitable habitat on site for terrestrial mammals, with little connectivity to other more suitable habitats.
- 7.29 Overall, the application site provides nature conservation value in a local (parish) context, containing ecological features such as garden trees and shrubs. The mown lawn offered few opportunities. The site provides negligible potential for bats, badgers and herpetofauna, however, should any of these protected species be found on site during works, then all works must stop and advice from an ecologist sought. The trees and shrubs provide moderate potential for breeding birds, and it is recommended that the works be undertaken outside of the breeding bird season.

Biodiversity Net Gain Report

- 7.30 A Biodiversity Net Gain calculation was undertaken by Morgan and Stuckey using the Natural England Small Sites Metric (February 2024) and a Biodiversity Net Gain Report prepared.
- 7.31 The Assessment confirms that the proposed development will result in a 30.77% BNG loss in Habitat Area Units. This is due to an increase in developed land area and subsequent decrease in vegetated area on site. It is not possible to achieve the required 10% net gain on site, and therefore off-site compensation will be required. Should the units be sourced via a third-party habitat bank or similar, then a further 0.01 Habitat Units of Low Distinctiveness habitat (or above) is required. As the unit requirement is very small, the Statutory Biodiversity Credits Scheme may require consideration, in which case, 0.02 credits of Tier A1 are required.

Affordable Housing Contribution Assessment

- 7.32 Rapleys has prepared an Affordable Housing Contribution Assessment in order to assess the financial viability of the scheme and the level of affordable housing and S106 contributions that could be provided.
- 7.33 Policy LP36 of the LB Richmond Upon Thames Local Plan states that a financial contribution equivalent to 5% affordable housing should be provided, equating to a financial contribution for the scheme of £43,457.
- 7.34 Rapleys has undertaken a FVA of the scheme. They have assessed the viability of the scheme on all open market basis to determine the total surplus which is generated to support affordable housing and other s106 costs and a second policy compliant iteration of the appraisal including the policy compliant affordable housing financial contribution.
- 7.35 Rapleys have established that the scheme delivering 0% affordable housing generates a Gross Development Value (GDV) of £1.3 million. The total costs for delivering the scheme are £1.07 million and they have assumed a developer return at 17.5% return on GDV. Based on a 100% open market development with no affordable housing the scheme generates a residual land value at £0.50 million.
- 7.36 In order to assess the viability of the proposed scheme, Rapleys have compared the residual land value with the benchmark existing land value. The existing use in this case is garden land and the benchmark land value has been based on the diminution in value of the application property 50 Station Road from the loss of half of its garden which has been estimated at £50,000. They have allowed for a landowner's premium at 20% and therefore benchmark land value has been set at £60,000.
- 7.37 The appraisal has confirmed that the development is considered viable and can make a full contribution towards affordable housing.

Traffic Management Plan

- 7.38 A Traffic Management Plan has been prepared by AGA Limited in order to manage all vehicles for deliveries, the removal of waste and general construction traffic as part of the construction programme.



Figure 31: Proposed routing of traffic

- 7.39 The proposed routing of vehicles is shown above. A strict delivery schedule will be operated between 10am and 3pm.

Construction Management Plan

- 7.40 A Construction Management Plan has been prepared by AGA Limited. The normal site working hours will be between 8:00am – 5:00pm Monday to Friday. Weekend working will not take place, unless essential, in order to minimise disturbance to the residents. Any noisy activities would take place between 8am-10am, 12pm-2pm and 4pm 6pm Monday to Friday. Welfare facilities will be set up on site. All deliveries will be managed by the Site Manager. Parking is limited on site and site personnel will be encouraged to use public transport.
- 7.41 There will be a maximum of five construction deliveries per day, using a route via the main entrance off Ellison Road and these will be marshalled by a banksman and loaded down to the storage area. Materials will be stored carefully in skips in the west of the site. Waste will be removed from the site and transferred to a waste management and recycling centre, where it will be segregated ready to be recycled.
- 7.42 The site will conform to the Joint Code of Practice; Fire Prevention on Construction Sites. The Contractor will liaise with the surrounding residents of Station Road and Ellison Road, in order to update them on progress and ensure any problems arising can be speedily and positively resolved.
- 7.43 The Contractor will promote local employment and where feasible will source services, materials and equipment locally.

8.0 PLANNING CONSIDERATIONS



Introduction

8.1 The application site provides a good opportunity to bring forward a new 3 bed/5 person family house and to optimise the use of the land, whilst responding to the existing character of the site and surrounding context. The scheme allows for the development of a high quality, dual-aspect, dwelling, which will replace an existing low quality garage structure and unattractive hard-standing area, which currently detracts from the streetscene and wider Conservation Area

8.2 The following section of the Planning Statement sets out the key planning considerations for the proposed development:

- The principle of Development;
- Land use and residential mix;
- Heritage Considerations;
- The scale, design and layout of the scheme;
- Residential amenity;
- Transport and Servicing;
- Energy and Sustainability principles.
- Biodiversity; and
- Flood Risk.

The Principle of Development

8.3 The pre-application advice received in May 2024 confirmed that there was no objection to the demolition of the garage; and supported the principle of a new house on the site

in the proposed location, subject to certain design changes.

- 8.4 The proposed scheme would optimise the use of the site in accordance with paragraph 123 of the NPPF and Policy GG2: Making the Best Use of land of the London Plan.
- 8.5 The existing application site comprises a long linear garden between Station Road and Ellison Road, as shown in Figure 2 of the Planning Statement. Number 50 Station Road is one of the few properties which had retained the garden area between Station Road and Ellison Road, and most other properties have already been divided to enable properties to be developed fronting onto Ellison Road. The garden area to number 50 is very long and its subdivision will still enable adequate garden area to be retained for the original dwelling at 50 Station Road. The scheme design also ensures adequate separation between dwellings and the enhancement of the street frontage.
- 8.6 As detailed in the Design and Access Statement, the scheme has been carefully designed to respect the requirements of Policy LP 39: Infill, Back land and Back Garden Development and to maintain local character, amenity space and biodiversity.

Land Use and Residential Mix

- 8.7 The application site is located within a predominantly residential area. The site is currently partly in residential use and the surrounding properties are generally in residential use. The pre-application advice "*considered that the principle of residential development is acceptable subject to compliance with relevant provisions of the development plan and other material planning considerations.*"
- 8.8 The advice goes on to note that "*the proposed dwelling would contribute to the borough's housing targets and would make effective and efficient use of a currently unattractive and underutilised space. The proposal provides a family sized dwelling, the proposal is not located within one of the five main centres within the borough or an area of mixed use, as such the scheme is in line with part A of LP35 of the Local Plan.*"
- 8.9 Policy GG4 (Delivering the homes Londoners need) of the 2021 London Plan emphasises the need for more homes to be delivered; whilst the NPPF acknowledges that small sites can make an important contribution to meeting the housing requirements of an area. The pre-application advice confirmed the acceptability of developing a new house on the site.
- 8.10 The principle of residential development on the site is also supported by Chapter 5 (Delivering a sufficient supply of homes) of the NPPF which recognises that the

importance of meeting the needs of specific housing requirements. The need for additional housing is recognised in the London Plan and Local Plan policies. Policy LP 34: New Housing sets a Borough target of 3,150 homes for the period 2015-2025.

- 8.11 In terms of housing mix, the NPPF and London Plan Policy requires new development to offer a range of housing choices. Richmond Local Plan supports more family sized housing whilst draft Policy 13 notes that the highest demand is for 2 and 3 bed properties. The proposed scheme therefore meets this policy requirement.
- 8.12 Draft Policy 11: Affordable Housing notes that a contribution towards affordable housing will be expected on all housing sites. A Viability Assessment has confirmed that the scheme can support a 5% affordable housing contribution.

Heritage Considerations

- 8.13 The application site is located within the Barnes Green Conservation Area, which is considered a designated heritage asset.
- 8.14 Policy LP 3: Designated Heritage Asset states at paragraph A 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.”* The removal of the garage and its replacement with a high quality house, is considered to be positive contribution to the conservation area.
- 8.15 The existing single storey garage and adjacent parking area provides a limited contribution to the character or appearance of the conservation area; and creates a break in the streetscene, thereby further detracting from the conservation area.
- 8.16 The proposed new house will enhance the conservation area and the provision of an additional residential unit is considered to be of public benefit.

Scale, Design and Layout of the Scheme

- 8.17 The proposed scheme will provide a high-quality dual aspect home, which meets the London Plan space standards. Following pre-application advice, the scale of the property has been reduced from three to two storey to reflect the pre-application advice provided and to respond to the local character of the area.
- 8.18 Chapter 12 of the NPPF (Achieving well-designed places) sets out the importance of high-quality buildings and places and of ensuring that developments are visually attractive as a result of good architecture, layout and appropriate and effective

landscaping; and are sympathetic to local character and history..

- 8.19 The design and siting of the house follows from a detailed analysis of the site and surrounding context, in order to establish the local character, in accordance with Policy LP 1: Local Character and Design Quality, which states that the Council will require all development proposals to be of high architectural and urban design quality and demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance. The scheme also takes the opportunity to improve the quality and character of the western part of the application site, and the new house is compatible “*with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing.*”
- 8.20 The scale, form and massing of the proposed house has been amended following the pre-application advice, which noted that “*the design, height and form of the proposed house needs to be respectful to the prevailing character of Ellison Road, not just the areas included in the conservation area but those properties immediately to the south-east.*” The roof profile has also been amended to reflect the profile of the existing terrace. In addition, the choice of materials reflects the historic context.
- 8.21 The pre-application advice confirmed that adequate outdoor amenity was provided as part of the scheme.
- 8.22 The use of traditional materials such as brick walls, stone detailing and slate roof finish reflects the predominant character of the surrounding area, and when paired with simple detailing creates a sympathetic but contemporary addition to the street scene.

Residential Amenity

- 8.23 The proposed house has been carefully designed to minimise any overlooking and loss of daylight/sunlight to the adjoining properties.
- 8.24 The Daylight Sunlight Assessment (Neighbouring Properties) confirms that the proposed development will not result in any notable impacts on daylight and sunlight access to neighbouring properties when assessed against the BRE guidelines.
- 8.25 The Daylight/Sunlight and Overshadowing Report concludes that the proposed scheme will provide satisfactory levels of daylight and sunlight access to future residents and their home.

- 8.26 The section diagram in Section 4.1 of the DAS indicates that the windows noted as 'neighbouring windows would fall within the acceptable limits for new development in relation to neighbouring properties in accordance with Fig .1, 3.2 Privacy and Space Between Buildings within SPD - House Extensions and External Alterations.
- 8.27 The scheme therefore meets the requirements of the London Plan, which requires new development to facilitate an inclusive environment which delivers appropriate outlook, privacy and amenity to both new and neighbouring residential occupiers. It is also in accord with Policy LP 8: Amenity and Living Conditions, which requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. Policy LP8 also states that the design and layout of buildings should enable good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; and ensure no unacceptable overlooking or noise.

Transport and Servicing

- 8.28 The existing two parking spaces will be replaced by one car parking space, which is considered sufficient and in accordance with Richmond Policy LP45. Two secure covered cycle parking spaces will be provided in accordance with London Plan standards.
- 8.29 A Traffic Management Plan has been prepared, setting out the required routing of vehicles. In addition, a Construction Management Plan has been provided as part of the application submission. This confirms the controlled site working hours and maximum number of deliveries per day.

Energy and Sustainability Principles

- 8.30 The Energy Strategy has been developed in accordance with the London Plan energy hierarchy. A 35% carbon emissions reduction beyond Part L 2021 of the Building Regulations has been incorporated within the design and is demonstrated within the accompanying Energy Report.
- 8.31 The scheme has been designed to reflect the sustainability objectives set out in the NPPF, the London Plan and the Richmond Local Plan. The Sustainability Strategy incorporates specific measures relating to climate resilience, ecology and biodiversity, sustainable transport, energy and carbon, health and wellbeing and materials and waste. The scheme will make a valuable contribution to providing more homes in the Borough, in an accessible location within easy access to a number of shops, services

and facilities.

Biodiversity

- 8.32 A Landscaping Strategy has been developed to increase the urban greening and biodiversity of the site. The scheme introduces new habitats to the site and provides additional planting including wildflower green roofs. The Biodiversity Net Gain Assessment confirms that the proposed development will result in a 30.77% BNG loss in Habitat Area Units due to an increase in developed land area; but off-site compensation will be provided.
- 8.33 A number of ecological enhancements are proposed, including the installation of bird boxes and bug hotels. A CAVAT Valuation has been undertaken; and the proposed tree planting strategy will mitigate for those trees removed by providing replacement trees to directly replace the CAVAT valuation.

Flood Risk

- 8.34 The site lies within Flood Zone 3 of the tidal reaches of the River Thames. In consequence, the accommodation has been designed to achieve the required floor levels of 5.36 AODN for living accommodation and 5.66m AODN for sleeping accommodation. Other proposed mitigation measures include constructing the ground floor using flood resistant and resilient design techniques; and a requirement to sign up to the EA's Flood Warning Service and Met Office Weather Warnings. The scheme incorporates SuDS into the proposed drainage strategy and makes use of water butts, a green roof and permeable surfacing system.
- 8.35 It is therefore considered that the proposed scheme has been designed in accordance with Part A of Policy LP 21: Flood Risk and Sustainable Drainage, which 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 account of climate change and without increasing flood risk elsewhere.

9.0 SUMMARY AND CONCLUSION

- 9.1 Planning permission and conservation area consent is sought for the subdivision of the rear garden plot at number 50 Station Road, the demolition of the existing single storey garage fronting onto Ellison Road (within the conservation area) and the construction of a 3 bed/5 person house, with one off street parking space, landscaping, bin storage and cycle storage.
- 9.2 The pre-application advice provided in May 2024, confirmed the acceptability of the proposal, subject to certain design changes in order to reduce the scale and form of the proposed house and to ensure that it reflected the local character context. These changes have been incorporated into the current scheme. In addition, a series of Technical Assessments have been prepared in support of the proposals.
- 9.3 It is therefore requested that planning permission be granted for the development of the new dwelling at the rear of number 50 Station Road.