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#### Former Victoria House Care Home 2-4 Ennerdale Road TW9 3PG

Design & Access Statement 2041.03.01.01.A

November 2024

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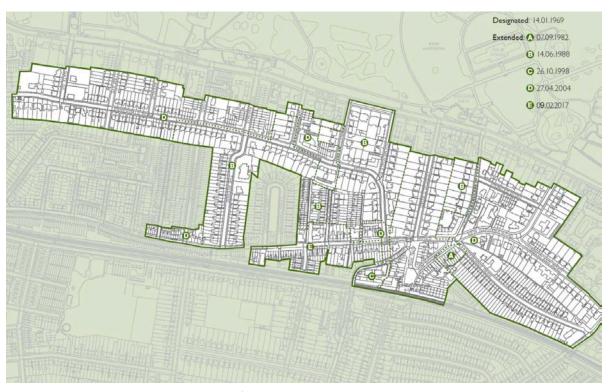
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#### 1. Introduction to the Site

The site consists of a collection of interlinked buildings, which have most recently been used as the Victoria House Residential Home. This usage commenced sometime shortly after 1974, incorporating two large adjacent Victorian villas, (2 and 4 Ennerdale Road) which were later extended to the east and west through a series of interconnected additions. To the far western and eastern ends of the site the 1970s built, Stewart and Baker Building currently sit forwards of both original Victorian villas, detracting from their setting. The care home operated until late 2022, at which point it closed, having been deemed inadequate by the Care Quality Commission. The site has since remained vacant, with no buyers deeming the buildings appropriate from which to operate a modern high quality care home.

The applicant, who recently procured the site, proposes to change the use of the site back from class C2, Residential Institution, to class C3, Dwellinghouses, returning the site to its intended use. As part of this proposal the character of the original houses will be restored. In doing so the collection of cluttered extensions which detract from the appearance of these heritage assets will be removed. The proposals provide 7 new residential units. These units sensitively respect the scale and immediate context of Ennerdale Road which is a residential street.

The site sits within the Kew Gardens Conservation Area (No.15), and the two original Victorian detached villas, Numbers 2 and 4 Ennerdale Road, are designated as Buildings of Townscape Merit (BTMs).



Kew Gardens Conservation Area No.15

## 2. Proposal



Existing Sketch View from Holmesdale Road

The proposal seeks to revert the use of the site to private residential and to re-establish the prominence of the two original villas (BTMs) within the plot. This involves removing the ancillary buildings which currently dilute their form, returning both building's footprints closer to their originals.

Included within the proposal is the sensitive conversion of both numbers 2 and 4 Ennerdale Road into two pairs of linked semi-detached dwellings.

Across the site, the balance between reuse and replacement has been carefully considered to ensure the proposals have a positive impact on the conservation area, whilst also densifying the site in line with LBRuTs Local Plan and SPD.

At the western end of the site, demolition of the late 20th century linked accommodation and Stewart Building is proposed. This is to allow for its replacement with two further semi-detached townhouses, which emulate the scale and detailing of the two original villas, and thus are in keeping with the character of the Conservation Area. This removes the blot on the streetscape currently created by the late 20th accommodation building and replaces it with something of higher architectural value and design quality. These proposed buildings are set back from the front elevation line of the current Stewart Building to follow the original curving building line of the street.

To the eastern end of the site, it is possible to retrofit the 20th century detached building to form a seventh family home. Careful consideration has been taken here to understand the suitability of the

building as a modern dwelling and how retaining 1970s unit of lesser architectural value and design quality is offset against the carbon saved through reuse. Here an acceptable balance can be achieved unlike at the western end of the site.

Demolition of utilitarian extensions and additions to the rear is proposed across the entire site to recover former garden space. The remodelling of the front boundary treatments improves street and kerb appeal which are key to this proposal.



Proposed Sketch View from Holmesdale Road

## 3. Planning History

Application Number: 67/1187 Address: 2 Ennerdale Road Kew

Description: Erection of eight garages for the use of occupiers of the guest house.

Validation Date: 19/06/1967

**Granted Permission** 

Application Number: 67/1187/DD01 Address: 2 Ennerdale Road Kew

Description: Erection of 8 garages for the use of occupiers of the guest house. Condition Nos. (b) & (c) of

planning permission 67/1187 dated 14th September, 1967.

Validation Date: 04/03/1968

**Granted Permission** 

Application Number: 72/2799 Address: 2-4 Ennerdale Road Kew

Description: Demolition of existing buildings and erection of four-storey block comprising 16

two-bedroom flats; erection of sixteen garages and provision of ten parking spaces.

Validation Date: 13/10/1972

Refused

Application Number: 72/3269 Address: 2-4 Ennerdale Road Kew

Description: Demolition of existing buildings and erection of nine five room 3-storey houses; erection of

nine garages and provision of ten parking spaces.

Validation Date: 01/12/1972

Refused

Application Number: 73/2768 Address: 2-4 Ennerdale Road Kew

Description: Demolition of existing buildings and erection of 15 flats in two blocks together with 26

garaging/car parking spaces. Validation Date: 05/11/1973

Refused

Application Number: 74/1319

Address: 2 And 4 Ennerdale Road Kew Description: Use of two houses as offices.

Validation Date: 07/11/1974

Refused

Application Number: 75/1027 Address: 2/4 Ennerdale Road Kew

Description: Alterations to and conversion of existing houses and erection of new one and two-storey

buildings to provide sheltered old persons housing and provision of 6 parking spaces.

Validation Date: 03/09/1975

**Granted Permission** 

Application Number: 77/0778

Address: 2 and 4 Ennerdale Road Kew

Description: Alterations to and conversion of existing houses and erection of new one and two storey

buildings to provide sheltered old persons housing and provision of 6 parking spaces.

Validation Date: 25/07/1977

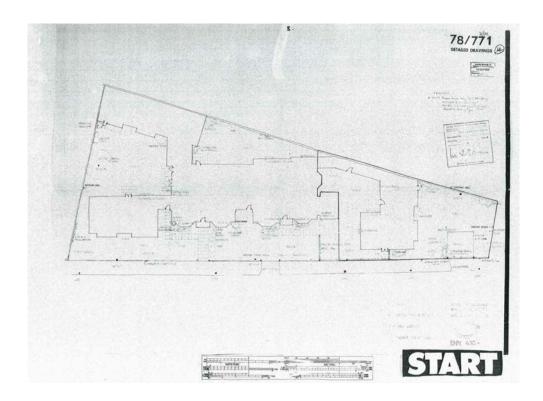
**Granted Permission** 

Application Number: 78/0771 Address: 2 Ennerdale Road Kew

Description: Erection of part single, part two storey house to provide sheltered housing for old persons.

Validation Date: 28/06/1978

Granted Permission



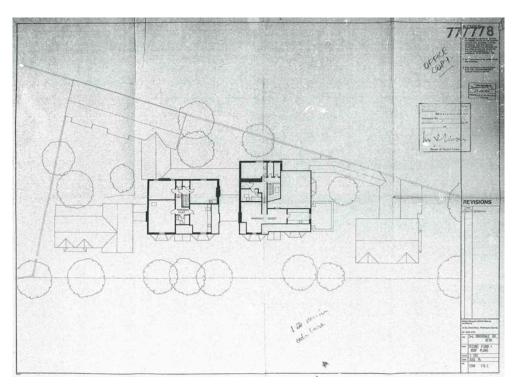
Application Number: 77/0778/DD01 Address: 2/4 Ennerdale Road Kew

Description: Alterations to and conversion of existing houses and erection of new one and two storey buildings to provide sheltered old persons housing and provision of 6 parking spaces. (Detailed drawings

of fencing to highway frontage). Condition No. 25 of planning permission  $\,$ 

Validation Date: 14/09/1979

Granted permission



Application Number: 78/0771/DD01 Address: 2 Ennerdale Road Kew

Description: Erection of part single part two storey house to provide sheltered housing for old persons. (Detailed drawings of fencing to highway frontage). Condition No. 25 of planning permission 78/0771

dated 13/9/78. Validation Date: 08/11/1979

**Granted Permission** 

Application Number: 77/0778/DD02 Address: 2 and 4 Ennerdale Road Kew

Description: Alterations to and conversion of existing houses and erection of new one and two storey buildings to provide sheltered old persons housing and provision of 6 parking spaces (Detailed drawings -

landscaping). Condition No. 71 of planning permission 77/07

Validation Date: 18/03/1980

**Granted Permission** 

Application Number: 85/0748 Address: 2 and 4 Ennerdale Road Kew

Description: Addition of link bridges at first and second floor level.

Validation Date: 23/05/1985

**Granted Permission** 

Application Number: 88/1792 Address: 2 & 4 Ennerdale Road Kew

Description: Single storey rear extension to provide a staff room.

Validation Date: 04/08/1988

**Granted Permission** 

Application Number: 90/0381/FUL Address: 2/4 Ennerdale Road, Kew.

Description: Formation Of Sitting/link Room At Ground Floor Level.

Validation Date: 27/02/1990

Granted Permission



Application Number: 92/0283/FUL Address: 2-4 Ennerdale Road, Richmond.

Description: Provision Of New Office, Extension Of Residents Room, New Lift Shaft, First Floor Infill

Extension, Wc Extension. Validation Date: 17/02/1992

**Granted Permission** 

Application Number: 95/T0161/CA Address: 2-4 Ennerdale Road, Kew Description: Remove Pink Chestnut Tree

Validation Date: 20/01/1995

**Granted Permission** 

Application Number: 12/2598/FUL

Address: Abbeyfields 2 - 4 Ennerdale Road Richmond TW9 3PG

Description: Replacement of 2 No. existing timber rooflights with conservation style rooflights.

Installation of 3 No. additional conservation style rooflights. Replacement of 3 No. windows with glazed

patio doors. Installation of new raised patio area / fire escape

Validation Date: 21/08/2012

**Granted Permission** 

Application Number: 16/T0443/TCA

Address: Victoria House 2 - 4 Ennerdale Road Richmond

Description: T1 - Sycamore - Fell Validation Date: 16/06/2016 Council raises no objection

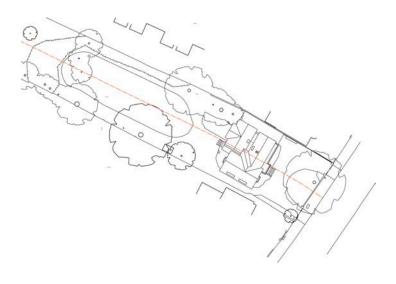
# 4. Relevant Planning Permissions History within Local Context

Application number: 19/0228/FUL

Address: 173 Kew Road Richmond TW9 2BB

Description: Division of the existing dwelling house, designated as a Building of Townscape Merit, into two residential units in the form of semi-detached houses. The demolition of the existing adjoined garage and alterations to fenestration.

Granted Permission 28/06/2019

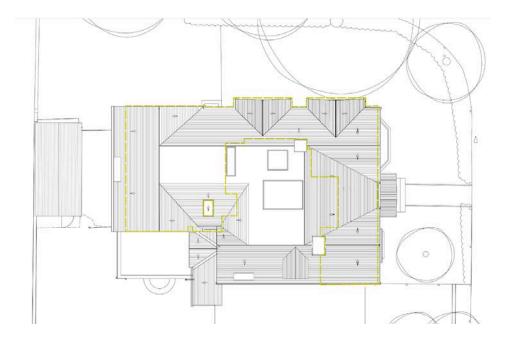


Extract from approved 1182.10.03.Pln.002

Application Number: 20/2799/HOT

Address: Lansdowne House 5 Branstone Road Richmond TW9 3LB

Description: Replacement of roof and reconfiguration to remove failing internal valleys. Removal of existing rooflights. Replacement dormer window and 1 new rooflight on western side roof slope. 2 new rooflights on the eastern side roof slope.



Close to 2-4 Ennerdale Road, on the junction of Ennerdale and Branstone Road replacement of an existing pitched roof, with a crown roof on a similar BTM was granted permission in 23/03/2021 and has since been implemented.

Application Number: 07/3471/FUL

Address: Land Adjacent 373 Sandycombe Road Richmond Surrey

Description: Proposed erection of detached dwelling with basement (variation to scheme approved by planning permission reference 06/1987/FUL).

This dwelling sits on a commanding plot close to 2-4 Ennerdale Road, an example of 21st Century design completing the Victorian town planning and street scene.

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#### 5. Case for the creation of 7 dwelling houses at 2-4 Ennerdale Road

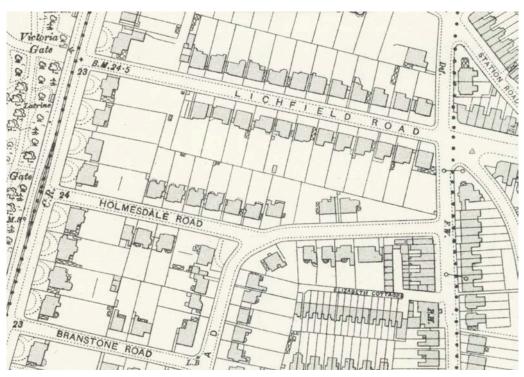
The change of use from class C2, Residential Institution, to class C3, Dwellinghouses, is justified given the care home was not in use prior to the sale of the site, having lost its licence after being found inadequate by the CQC. Constraints set by the BTMs impede the properties from functioning well as a modern care home. Accessibility was not a key factor in the original design of these properties. The 1975-90s retrofitted solutions and ancillary spaces create the warren-like properties of the existing site, resulting in a convoluted building plan. In addition, the solar gain and temperature in these BTMs would be difficult to control, with sun-facing rooms in constant occupancy. As family homes these rooms could simply be used at cooler times of day, and cross ventilated when room privacy is not an issue and the more rational original plan of the BTMs could be returned to better facilitate cross ventilation. Investment and remedial works are required to ensure the longevity of the BTMs, which would be provided by the proposal. Please refer to the report prepared by Christie, supporting the change of use from a care home.

Within the Kew Gardens Conservation Area, as locally listed BTMs, numbers 2 and 4 Ennerdale Road, are heritage assets. They escaped demolition in the 1970s, but are now in a poor state of repair and vacant. The proposal seeks to restore these to quality buildings for continued use as family dwellings for decades to come.

The densification of the site provides heritage benefits, recreating a break between both bookends and the BTMs. It also re-establishes more of the original footprint of the BTMs, in doing so it further adds heritage value. Densification of the site should be strongly supported in view of national housing shortages; the new Labour government having set out highly ambitious housing targets. The borough met only 92% of its housing targets set out in the previous LBRuT Local Plan. As a result of this, there is growing pressure from the National Government, and the Mayor of London, on the Borough to deliver on its local housing targets. Emerging new policies appear to be focusing on increased housing delivery albeit in a sensitive and incremental manner, with which the proposal is aligned. The council highlights that higher density home development is required. Just outside town centres it insists on incremental intensification. The proposal of seven new family homes offers a largely positive contribution to the local area.

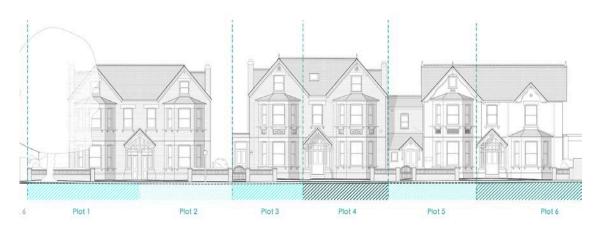
## 6. The Design Concept

## 6.1. Layout



Surrey I.16 (includes: Heston and Isleworth; Kew; North Sheen; Richmond) - 25 Inch Map 1910|Ordnance Survey. Showing a side structure on number 4 Ennerdale Road.

A principal design focus has been to complete the Victorian street plan. Since the 1970s, various ancillary buildings have increasingly populated the site, to support the residential care home. Today the sprawl of these surrounds the two central BTMs. This dilutes their presence and place within the streetscape, creating a blot and breaking up the regular rhythm of the original Victorian street plan. This proposal reintroduces a regular rhythm, set by the substantial two-two and a half storey detached and semi-detached villas which are characteristic of the wider conservation area. This proposal regularises the plot layouts for each of the proposed 7 units. Each villa is fronted by continuous front boundary walls or railings onto the street.



Proposed street elevation of plots 1 to 6 extract from 2041.03.03.Pln01.010.D-Proposed Street Elevation

Some densification is proposed on the site, to provide some consistency with the historical density of the surrounding conservation area. The linear plots, which are characteristic of Ennerdale Road, follow the gentle curve of the road. The proposed semi-detached villa on plots 1 and 2 bridges the difference in angle between numbers 4 and 6 Ennerdale Road. The front elevation line of these proposed dwellings is set back from the elevation line of the current Stewart Building, as shown in the massing diagrams below. Each house is set back from the road, fronted by a traditional front garden, and benefits from a substantial rear garden.



Existing Massing Diagram extract from 2041.01.03.Exg.004



Proposed Massing Diagram extract from 2041.03.03.Pln01.004

The proposed 7 units are a mixture of 4 and 5 beds and vary in size from 144m<sup>2</sup> to 229m<sup>2</sup>. Whilst these are large compared with minimum space standards, they reflect an appropriate scale for the local area, and the applicant is keen to avoid overwhelming the site with over-densification.

Internally, both BTMs retain their original staircases in the original positions. Where they are split by the proposal, further staircase cores are set within the adjoining semi-detached property taking reference from the original layouts. The additional principal entrances utilise the existing central link between numbers 2 and 4 Ennerdale Road, and the position of the side porch to number 4 Ennerdale Road.; the massing for which has appeared, in various forms, on maps since 1910. The position of these was carefully considered to ensure they did not impact on the elaborate timber frame entrance porches of number 2 and 4, and remain subordinate to the original entrances.

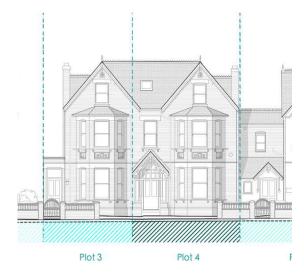
The traditional layout of the BTMs further influenced the plan of the new semi-detached villa, proposed on plots 1 and 2. Each of the proposed family homes has a formal entrance hall and front drawing room, utilising the mirrored bay windows. Open plan kitchen, dining, living spaces to the rear of the ground floor offer each unit the flexibility expected from a modern family home. Upper floors again reference the traditional built form of the original villas, with bedrooms leading from a central staircase circulation core. The principal rooms are on the ground and first floors, and smaller bedrooms and ancillary functions utilise the steep-pitched roof-form and existing basements. Each unit complies with the minimum space standards set out within The London Plan. For further illustration of this refer to Appendix 14.1 Housing Standards Schedule, confirming the GIA of each unit.

#### 6.2. Appearance

The design of the proposed semi-detached villa has taken reference from the prevailing house type in the conservation area. The layout and built form, centres around a central timber framed porch, sided by symmetrical two-storey canted bay windows. The proportions of the proposed traditional sliding sash windows echo the elegant proportions of those on the BTMs. Where the porch on the proposed semi-detached villa has two entrance doors within, these reference the double door sets commonly found within these same porches on Ennerdale and Branstone Road. Ornament across the proposed semi-detached villas, will sensitively reference the lintel, bargeboard and string course details of the neighbouring BTMs. The decision not to replicate ornamental crested ridge tiles and decorative terracotta panels, on the front of the new villas, retains the elevated status of both neighbouring BTMs.



Proposed street elevation of plots 1 to 2 proposed semi-detached villas extract from 2041.03.03.Pln01.010



Proposed street elevation of plots 3 to 4, BTM, no. 4 Ennerdale Road, extract from 2041.03.03.Pln01.010



Extract from 17/3108/HOT Pilgrim Lodge 31 Ennerdale Road Richmond TW9 3PE



Extract from 20/2351/HOT 1400.04.01.Pln.2.060 [Proposed Front (South) Elevation] Lansdowne House, 5 Branstone House

Plot 7 is the most compact, given the tapering site depth. The existing Baker Building is softened by a street tree and hence it has a more subtle impact on the street scene than the Stuart Building at the other end of the site. It is therefore proposed to retain this building, with heavy modification, and retrofit it as a final townhouse in this layout. The form and layout of the existing building is also more suited to being retrofit to form a modern family home. Wherever possible, design decisions have been made to improve the visual appearance of the existing building. Windows and openings are proposed to be replaced with traditional sliding sashes, the proportions of these being more slender and in keeping with windows found throughout the conservation area. These will be articulated with the same lintel detailing shown across the site, in character with the BTMs. The principal door will be replaced with one of a more in keeping Edwardian style and its position has been centralised, allowing for the introduction of a pitched porch canopy on painted timber gallows brackets, further referencing porches within the conservation area.



Proposed Sketch View from Sandycombe Road

#### 6.3. Materials

The current materiality within the conservation area is characterised by yellow London stock and red brick, paired with clay tiled and slate roofs. Steep-pitched front-facing gables are adorned with ornamental bargeboards and timber-framed porches. The painted timber sash windows articulate the bays and demonstrate the traditional decreasing hierarchy of rooms, progressing up the storeys. Terracotta panels, ridge cresting and finials further ornament the existing BTMs throughout the area. Unfortunately, a number of these features have been lost over the years in the buildings on this site.

All of the above will be carefully restored across both numbers 2 and 4 Ennerdale Road. The subdivision of both BTMs has been carefully considered in order to keep all the ornate features such as the original timber porches intact and no material or ornament compromised to facilitate the proposal.



Photograph of 2 and 4 Ennerdale Road, in summer 2024

Over the course of the last Century, since their construction, the elegant timber bargeboards have been damaged and/or been removed in places. The proposals include the restoration of these, where they do not block existing windows and reduce natural light levels. The bargeboards will be freshly painted black as is the tradition within the context. All lintels, sashes and sills will be painted off-white, again, in keeping with the conservation area. Number 4 Ennerdale Road still retains some of its original ornate crested ridge tiles, although now in poor condition, and the proposal seeks to restore these and replace those that are missing. Where Number 2 has been painted for over half a century, we cannot be sure of the condition or quality or quality of the brick below, therefore the decision has been made to repaint this. Prior to 2016, Number 2 Ennerdale Road had been painted cream, this was far more in keeping with the soft Yellow London Stock already existing within the context, as opposed to the stark white. It is therefore proposed that this BTM will be repainted in a sensitive light stone-like cream.

Where rear extensions are added to the BTMs, these are proposed in a brick to match the existing. Here the parapet has been designed to allow continuation of the string course, rather than interruption. The string course becomes a decorative detail to top the proposed parapet. Minimal framed, glazed doors to

the rear of these extensions maximise natural light levels and demonstrate a sensitive yet clear contemporary intervention to the rear of the host buildings.



Proposed Street Study of plots 1 to 7 extract from 2041.03.03.Pln01.302

In keeping with number 4 Ennerdale Road, the new semi-detached villa is proposed in yellow london stocks, with chimney stacks of the same with buff clay chimney pots. The decorative string course and stone cills and lintels will also be replicated. Cast iron guttering and slate roofs are also proposed. Furthermore, the decision to omit ornamental crested ridge tiles and decorative terracotta panels, on the front of the new villas, ensures their subordinate status next to the BTMs. Their characteristic front-facing gables will be dressed with black painted bargeboards, the detailing of which will be traditional, but not competing.

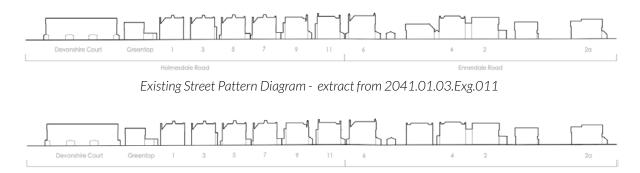
#### 6.4. Scale and Mass



Existing Summerhouse on Front Boundary

As a result of the years as a residential care home, the current site and BTMs is elongated and encompassed by mass due to various ancillary buildings and the barnacle-like nature in which the site has been developed. The proposal removes this sprawling ancillary massing, including a prominent summerhouse currently on the front boundary, which is detrimental to the street scene. It then redefines,

across 7 plots, the grain and rhythm of the wider conservation area, distinguished by its consistency of height and built form, at regular intervals, illustrated by the following diagrams.



Proposed Street Pattern Diagram - extract from 2041.03.03.Pln01.011

Where two new units within the semi-detached villa are proposed, the scale and massing of the original BTMs have been studied and carefully replicated with subtly subordinate ridge heights, characteristic steep front-facing gables and the same distinctive H-shaped ridge form. These proposed buildings are set back from the front elevation line of the current Stewart Building, no longer obscuring the view of the BTMs on the approach from Holmsdale Road.



Proposed Sketch View from Holmesdale Road

All proposed massing is bound and consistent within existing building lines set out in the wider street plan.

The roofs of both existing BTMs are in poor condition and require replacement. It is therefore proposed to take the opportunity to add additional volume at roof level to each of the 3 main buildings, in the form of concealed crown roofs. This was established as acceptable at 5 Branstone Road, a similar BTM nearby,

fronting onto Ennerdale Road, which was granted permission under 20/2799/HOT, in 2021, and has since been implemented. The flat section of roof is set lower than the principal ridgeline, allowing it to be completely concealed from all angles.

Street trees on Ennerdale Road are key to the character of the conservation area, their canopies also contributing to massing and the regular rhythm along the street. These will all remain and have been carefully considered throughout the design. (See Landscaping section below)

#### 6.5. Overshadowing

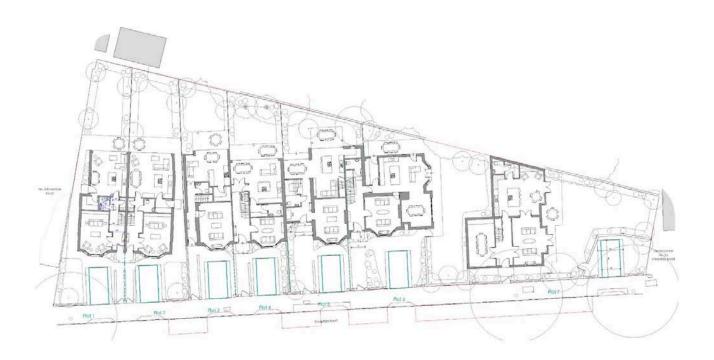
Set on an east-west axis along Ennerdale Road minimal overshadowing is created by the massing of proposal. All houses benefit from a south-facing orientation. Set within building lines, consistent with the rest of the street, the semi-detached villas replace the existing Stewart Building.

The rear gardens of the adjacent Lichfield Road, prevent overshadowing here, especially given the mature trees at the rear of those gardens, massing is proposed to be removed from the upper floors at the rear of the two existing BTMs to open up their rear gardens and provide improved natural light.

The additional volume of the replacement building will result in minimal overshadowing of the rear garden of number 6 Ennerdale Road only in the early morning, which is not considered significant due to the wide plot, and position of existing planting which already shades this section of garden.

The shadow cast in the evening light when the sun is in the west will only be cast across inactive faces, replicating the established situation set by the existing street plan. The existing Stuart Building, already in the shadow of the commanding number 6 Ennerdale Road, is set forwards of number 6 due to the curvature of the road. Bound within the same building lines and positioned at the same depth within the plot, the proposed dwellings replicate the same relationship with the sun path as those existing.

Where the existing Baker Building on Plot 7 is proposed to be extended at first-floor level, this is far enough removed from any other dwelling not to create any other shadowing.



Proposed site plan

#### 6.6. Overlooking

There is no increased opportunity for overlooking. Any side facing windows will be frosted and have been kept to a minimum, which is in line with the original plan of the street.

The plot boundary style is well established along the road. The traditional relationships are created across the site between the rear gardens and their neighbouring homes.

The proposed layout of the Baker Building has been carefully considered to remove windows from the west end, unless frosted, to avoid overlooking the garden of number 2 Ennerdale Road.

#### 7. Heritage

Great consideration has been given to both numbers 2 and 4 Ennerdale Road as Buildings of Townscape Merit, these buildings being central to the scheme. The proposal offers the opportunity to restore these buildings, including their decorative features and position within the streetscape and the wider context of the Kew Gardens Conservation Area. This, combined with the returning the properties to single family dwellings, as originally intended, adds significant heritage value.

The removal of the poor 1970s building at the western end of the site, and the siting of the new replacement building offer further heritage benefits. These new semi-detached dwellings are of high architectural value and design quality, in keeping with the prevailing Victorian style of the Kew Gardens Conversation Area and neighbouring BTMs, adding clear heritage benefit, in place of the low quality 1970s building. Furthermore, the introduction of this new villa completes the rhythm set out by the original Victorian street plan, adding further heritage value.

Where the eastern 1970s building is proposed to be retained, careful reworking of the front elevation has been proposed, making it more in keeping with the conservation area.

Finally, the remodelling of the front boundary treatments helps to reimplement a series of in keeping frontages, significantly benefiting the street scene and conservation area.



Proposed Sketch View from Sandycombe Road

A full Heritage Statement and Impact Assessment has been prepared by Barker-Mills Conservation, which accompanies this application.

#### 8. Landscape & Biodiversity

Today, the combination of overgrown planting and tall shiplap fencing detracts from the street scene. The original front gardens to both BTMs, key to the character of the conservation area, have been all but lost to poor quality gravel parking. An outline landscaping plan has been produced to enhance the proposed scheme, reinstating traditional front and rear gardens and reintroducing formal boundary treatments. All existing boundary wall(s) along the rear boundary will be retained. Appointed arboriculturist SJA Trees have surveyed the site, the scheme therefore considered their tree constraints plan. Street trees on Ennerdale Road and Holmesdale Road are key to the character of Kew Gardens conservation area, their canopies contributing to massing and the regular rhythm along the street. Given the prominence of the Villas along Ennerdale Road Street trees play a role in softening and greening the streets appearance. These will all remain and have been carefully considered throughout the design.



Proposed street elevation illustrating boundary treatments

Appointed ecologists, Arbtech have calculated that:

'The baseline habitat value of the site is 0.06 area-based habitat units with the proposed development resulting in a 60.83% area-based net gain and a 100% net gain for hedgerows (from a baseline of 0). The proposed development is therefore anticipated to surpass the minimum target of 10% biodiversity net gain and thus is compliant with legislation (Environment Act 2021). (Arbtech, 2024)



Proposed site plan

For further information refer to Biodiversity Net Gain Assessment produced by Arbtech and Arboricultural Impact Assessment by SJA Trees.

Arbtech have also undertaken ecological assessments including bat emergency surveys to ensure the scheme does not have a negative impact on local wildlife.

#### 9. Transport

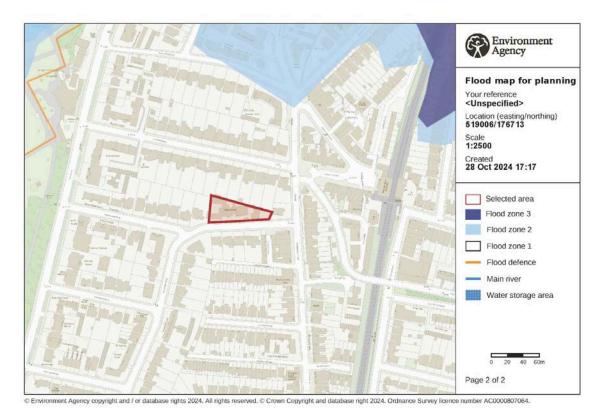
A parking stress test has been carried out by the Transport Consultant, Motion. Their findings are presented separately within the accompanying NO1 - Highways Technical Note. This has informed the design and site layout, providing off-street parking for each unit, in compliance with LBRuTs guidelines, whilst considering the character of the Kew Gardens Conservation Area and without detrimental impact on the on-street parking provision. Each of these spaces will be provided with an EV charger. A bicycle store within the curtilage of each dwelling will encourage cycling by future residents, promoting green transport methods.

#### 10. Access

Access has been considered, across the scheme, within the context of both BTMs within the site and the conservation area. For further information on this, refer to the Inclusive Access Statement demonstrating compliance with Part M4 (2).

#### 11. Flood Risk

The site falls within flood zone 1 and has a low probability of flooding from rivers and the sea.



For further information refer to the accompanying Flood Risk Assessment and SUDs proposal prepared by CGS Civils.

#### 12. Sustainability

Sustainability has been a key consideration throughout the design development of the scheme, with a careful balance sought between upgrading the existing fabric whilst retaining both Buildings of Townscape Merit within the site. The decision has been made to remove and replace some of the inferior quality buildings within the site in order to replace them with more energy efficient buildings, whilst also improving their appearance in line with heritage aims noted above.

Wherever possible new and upgraded building fabric has been specified to reach low U-Values to maximise fabric efficiency and reduce energy demand. The existing building envelope and materials of the BTMs and other retained buildings, will be upgraded through internal insulation without detriment to the conservation area and heritage assets. High-efficiency double-glazed timber frame windows will be installed and all lighting upgraded to efficient LED.

A feasibility review of the scheme's potential to connect to decentralised energy sources has been undertaken by NRG Consulting in line with The Energy Infrastructure of the London Plan, Policy SI 3, refer to Energy Statement.

Each proposed dwelling will benefit from an air source heat pump, alongside private dedicated bicycle storage, promoting the use of both sustainable energy and transport resources. As outlined in section 8. 'Landscape & Biodiversity', the scheme is also anticipated to surpass the 10% minimum target for biodiversity net gain.

The following information has been produced by NRG Consulting and is within the submitted Energy Statement in support of the scheme.

- Energy Calculations
- SAP Calculations
- Carbon Lifecycle Analysis
- BREEAM Domestic Refurbishment Pre-Assessment
- LBRUT Sustainable Construction Checklist
- Water Efficiency

#### 13. Conclusion

In conclusion, the proposal allows for two Buildings of Townscape Merit, both currently vacant and in an increasingly poor state of repair, to be restored and returned to full and intended use. Taking a vacant site, the proposal offers densification in line with the Local Plan and SPD and seven new residential units. High architectural value and quality design has been proposed, where ancillary building previously cluttered the site. The proposed new buildings complete the rhythm and massing of the original Victorian street plan and Conservation Area, whilst taking reference from, and sensitively responding to, the existing heritage assets within the site.

Across the site, the balance between reuse and replacement has been carefully considered to ensure the proposal has a positive impact on the conservation area, with a sustainable approach to this in mind. Throughout the development of the design, materiality, scale, massing, overshadowing and overlooking have been carefully considered. The input of specialist Heritage, Ecological, Arboricultural, Transport and Energy and Planning Consultants has further guided the proposed scheme.

We believe this proposed design would improve on the existing streetscape, restoring the currently vacant and tired-looking site. The improvements and protection of the BTMs, as heritage assets, created by the scheme, greatly outweigh any perceived damage. The proposal should have no impact on neighbouring properties, and in fact, improve kerb appeal for the benefit of all residents within the conservation area. The refurbishment of the BTMs and development of dwellings will improve the sustainability and longevity of the site. The proposal utilises the site to its full potential and we see no reason why the scheme should not, therefore, be widely supported.

# 14. Appendix

# 14.1. Housing standards schedule

Minimum Gross Internal Areas (GIA) and Storage						
	No. of bedrooms / persons	Min. London Plan flat area (m²)	Proposed flat area (m²)	Proposed private amenity (m²)	Proposed built-in storage (m²)	
Plot 1	4B / 8P	130 (3 Storey)	161.7	139	12.5	
Plot 2	5B / 8-10P	134 (3 Storey)	193.47	129	16.1	
Plot 3	4B / 7P	121 (3 Storey)	144.43	89	7.7	
Plot 4	4B / 8P	130 (3 Storey)	204.37	95	10.45	
Plot 5	5B / 8-9P	134 (3 Storey)	218.69	106	9.9	
Plot 6	5B / 8-10P	134 (3 Storey)	229.19	205	16.8	
Plot 7	4B / 7P	115 (2 Storey)	180.04	191	7.7	