

PLANNING STATEMENT



Demolition of existing two storey side extension and single storey extensions to facilitate the conversion of former care home (C2 use) to residential use together with the construction of a pair of semi-detached dwellings, with all works providing 7no. dwellings with associated accesses, parking and gardens.

At

2-4 Ennerdale Road, Kew, Richmond TW9 3PG

November 2024

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1.0 INTRODUCTION

- 1.1 Park Property Group (Kew) Ltd (“the applicants”) have instructed Hedley Clark to prepare this statement in support of a full planning application for the part conversion and part re-development of a former care home to provide 7no. dwellings, comprising a pair of new build semi-detached dwellings together with 5no. dwellings created by conversion, alteration and extension of the existing buildings, with associated access and parking and replacement boundary treatment (“the Proposal”) at 2-4 Ennerdale Road, Kew, Richmond TW9 3PG (“the Site”).
- 1.2 The purpose of this Statement is to provide evidence and demonstrate how the proposal accords and complies with the principles and policies established by the National Planning Policy Framework (NPPF) and development plan requirements.
- 1.4 This statement should be read in conjunction with the technical drawings prepared by MJ Architects and all other specialist technical reports submitted as part of this application.

BACKGROUND

- 1.5 The site consists of a collection of interlinked buildings, of varying age and form, which have most recently been used as the Victoria House Residential Home, first established as such in the mid 1970’s. The built form comprises two large, formerly detached, Victorian villas, with later additions to the east and west together with a series of single storey extensions to the rear, all of which creates a labyrinth of rooms and corridors. The former care home was effectively a ‘first generation’ home, created and adapted to reflect operational and care standards of the time.
- 1.6 The former care home was registered to provide care for up to 29 users and closed in December 2022. The buildings have lain vacant since. Abbeyfield Care, the previous owner and operator, has provided some commentary on the reasons behind closing the home, which includes the declining occupancy rate and the increase in void rooms. The limitations of the building, including bedrooms, circulation space and facilities render it no longer fit for purpose and any reconfiguration to meet operational standards is unviable. This is further compounded by the fact the buildings are recognized as Buildings of Townscape Merit (BTMs), within a Conservation Area and on a relatively restricted site (having originally served as residential plots rather than a commercial plot), all of which limits the viability and opportunities of either redeveloping the site entirely or substantially altering the historic arrangement (and form) of the buildings on site.

- 1.7 An independent assessment prepared by Christie & Co confirms there are fundamental specification deficiencies associated with Victoria House which make it uneconomic to re-open or operate, including the low proportion of en-suites/no wetrooms, irregular size of bedrooms, restricted and narrow corridors, lack of step free access in parts of the building as well as the low gross internal area per bed.
- 1.8 In addition to the findings that Victoria House is no longer viable for the provision of specialist housing, the assessment provided by Christie & Co examines existing care provision within the Borough of Richmond upon Thames and concludes it is sufficient to meet current demand requirements.
- 1.9 Following the closure of the former care home and a marketing exercise to dispose of the asset, no interest/offer was expressed from any alternative specialist housing provider, reinforcing the findings about the deficiency of the building for its established use as a care home and its inability to meet current and modern operational and market demands for specialist housing.
- 1.10 The applicant, who recently procured the site, seeks permission to change the use of the site back from class C2, Residential Institution, to class C3, Dwellinghouses. This would revert the site and Victorian villas back to their original use.
- 1.11 The development involves the part re-development and part conversion of the buildings to deliver 7no. dwellings. It will secure the removal of existing extensions that detract from both the original villas, which are Buildings of Townscape Merit (BTM) and include a pair of semi-detached new build properties, designed to emulate and respond to the characteristics and significance of the conservation area within which the site is located.
- 1.12 The scheme provides an important opportunity to deliver much needed high quality family housing within the Borough, secure enhancements to the Conservation Area and the Buildings of Townscape Merit themselves and positively contribute towards sustainable development objectives.
- 1.13 As will be demonstrated in this Statement and reflected in the specialist reports that comprise this submission, the site and all opportunities and constraints associated therewith have been carefully appraised within the context of planning policy and advice. This has culminated in a considered, high-quality proposal which optimizes the use of the site and positively furthers development plan objectives.

2.0 SITE DESCRIPTION

2.1 The site extends to 0.17ha and lies on the northern side of Ennerdale Road, just west of the junction with Sandycombe Road. The rear boundary tapers and the depth of the site decreases in an easterly direction. It currently comprises a pair of late Victorian villas, which are now linked, together with two storey modern extensions to the west and east with additional single storey extensions to the rear. The previous extensions have created a myriad of corridors and an awkward plan form (please refer to the existing floor plans submitted as part of the application). An OS extract and aerial image of the site are provided below at Figure 2.1 for ease of reference.

Figure 2.1 – OS extract and aerial image with the site edged red



- 2.2 As noted in Section 1, the site is known as Victoria House and was converted to a care home in the 1970's. It ceased being an operational care home in December 2022 when the owners/operators closed the facility due to increasing vacancy rates and operational difficulties.
- 2.3 The original late Victorian Villas are recognised as Buildings of Townscape Merit (BTM) and have been subject to numerous and mainly unsympathetic alterations and extensions in the last 50years. The original Victorian Villas remain legible, as shown in the photographs at Figure 2.2 but their appreciation is hampered by the poorly designed extensions to the west and east which are of distinct scale, form, materials and detailing.

Figure 2.2 – Photographs of the site



Above – Original Victorian villas with a link between them



Above – Modern two storey linked building at the eastern end of the site



Above – Modern two storey linked building at the western end of the site

- 2.4 The frontage of the site includes a variety of treatments and includes parking, landscaping, fencing and a section of wall (please refer to photographs at Figure 2.2). The land rear of the buildings is predominantly hard landscaped. There are no trees within the site itself.
- 2.5 The area is predominantly residential, characterised by substantial Victorian and Edwardian properties. To the east is a modern detached dwelling and to the southwest is a modern purpose-built flatted development. The site has a PTAL rating of 2/3 and it is noted that the station and local facilities are within 200m to the north east.
- 2.6 The site lies within the Kew Gardens Conservation Area. Please refer to the Heritage Statement prepared by Barker-Mills Conservation for a detailed review of the conservation area and its significance.
- 2.7 Reference should also be made to the Design and Access Statement which provides greater detail about the context of the site including the layout, massing and architectural detailing of properties.

3.0 RELEVANT PLANNING HISTORY

3.1 Table 3.1 below provides a summary of the relevant planning history associated with the site.

Table 3.1 Summary of Planning History

Application Reference	Description of Development	Decision
73/2768	Demolition of existing buildings and erection of 15 flats in two blocks together with 26 garaging/car parking spaces.	Refused
72/3269	Demolition of existing buildings and erection of nine five room 3 storey houses; erection of nine garages and provision of ten parking spaces.	Refused
73/2799	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.	Refused
74/1319	Use of two houses as offices	
75/1027	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.	Approved
77/771	Erection of part single storey and part two storey house to provide sheltered housing for old persons	Approved
77/0778	Alteration and conversion of existing houses and erection of single storey and 2 storey buildings to provide sheltered housing for old persons	Approved
85/0748	Addition of link bridges at first and second floor level	Approved
88/1792	Single storey rear extension to provide staff room	Approved

90/0381	Formation of sitting/link room at ground floor	Approved
92/0283	Provision of new office, extension of residents rooms, new lift shaft and first floor infill	Approved
12/2598/FUL	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	Approved

4.0 THE PROPOSAL

- 4.1 The proposal seeks permission for the demolition of an existing two storey side extension and numerous single storey extensions to facilitate the conversion of the former care home to residential use, together with the construction of a pair of semi-detached dwellings, with all works providing 7no. dwellings with associated access, parking and gardens.
- 4.2 At the western end of the site, a late C20th two storey extension will be demolished and a pair of semi-detached dwellings created. At the eastern of the site, the single storey link to the late C20th building will be removed, and the existing two storey building retained, altered and enhanced to create a detached dwelling. The central original pair of Victorian villas will remain linked together, but rear extensions will be removed and the villas converted to create 4no. dwellings. The extent of demolition proposed is shown on the drawing extract below at Figure 4.1.

Figure 4.1 – Extent of proposed demolition of modern extensions – extract of Drawing 2041.03.03.Dem.022



- 4.3 The construction of a pair of semi-detached dwellings at the western end and detachment of the eastern building will reintroduce a regular rhythm to the spatial arrangement of built form on site. The proposed layout is shown on the drawing extract presented in Figure 4.2. overpage.

Figure 4.2 – Proposed site layout



4.4 As shown in the drawing extract above, each property would benefit from its own pedestrian and vehicular access and each served by 1no. parking space. A consistent front boundary wall would be created between the accesses, reinforcing an established characteristic of the area. Each property would also benefit from a legible front garden together with private amenity space to the rear or side.

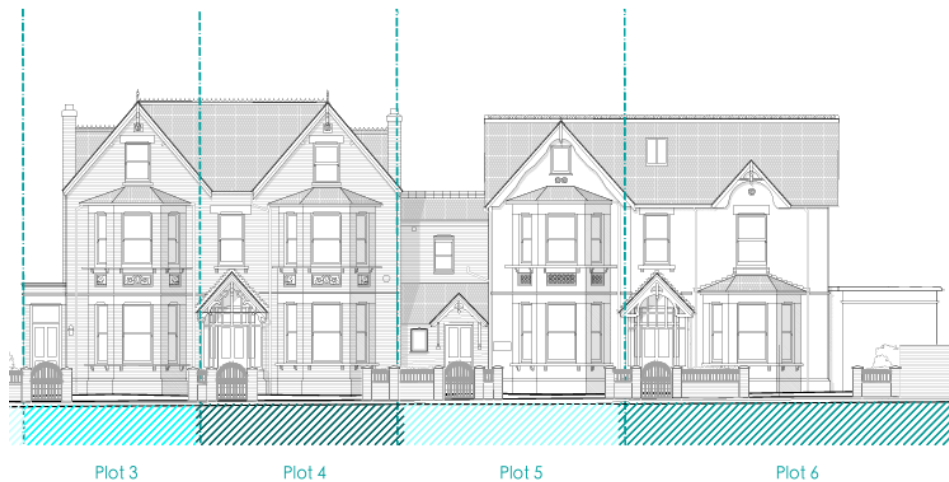
4.5 Plots 1 and 2 at the western end of the site have been designed to emulate and respond to the established scale, form and vernacular of properties in the area. The layout and design of these properties includes a central timber porch, sided by symmetrical two-storey canted bay windows. The proportions of the dwellings, including the fenestration details reflect the proportions of the BTMs on site and neighbouring properties. These properties have been carefully considered in their detailing to further reinforce characteristics of the area including the bargeboard, string course details, chimneys and stone lintels. The front elevation of this new build pair of semi-detached dwellings is shown in the drawing extract presented at Figure 4.3.

Figure 4.3 – Proposed Front elevation of Plots 1 & 2 (new build)



- 4.6 Plots 1 & 2 would be finished in yellow London stocks. Cast iron guttering and slate roofs are also proposed.
- 4.7 Plots 3, 4, 5 and 6 are created through the conversion of the linked Victorian villas (BTM's). The original primary entrances have been retained and additional entrances created using the existing entrance door in the central link between no.2 and no.4 and the side porch at no.4. This sensitive design approach ensures the subdivision of the buildings does not impact on the elaborate and ornate porches which would also remain dominant visually.
- 4.8 The proposed front elevation of plots 3, 4, 5 and 6 is shown on the drawing extract below at Figure 4.4.

Figure 4.4 – Proposed Front elevation of plots 3, 4, 5 and 6



- 4.9 At the eastern end of the site, the single storey link to the 2 storey building would be removed and in doing so would create a detached dwelling at Plot 7. This building, whilst forward of the original villas, is subordinate in form.
- 4.10 The existing built form that creates Plot 7 would be subject to modification and a first-floor rear extension. Where possible, design decisions have been made to improve the visual appearance of the existing building, including replacement sliding sash windows and lintel detailing. The entrance 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 porch canopy on timber gallows brackets, reinforcing existing features found within the area.

4.11 An extract of the proposed street scene, including Plot 7, is shown below at Figure 4.5.

Figure 4.5 – Proposed Street scene



4.12 The properties would provide 4/5 bedrooms and vary in size from 144m² to 229m². All properties would meet and exceed technical housing standards. Please refer to the schedule of accommodation that comprises part of this submission.

4.13 Full details of the proposal are shown in the comprehensive collection of drawings which also include precise details of demolition across the site.

5.0 LEGISLATION AND POLICY FRAMEWORK

5.1 In considering whether to grant planning permission with respect to any buildings or other land in a conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area. In this context, 'preserving' means doing no harm.

5.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004: *"when making any determination under the Planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise"*

5.3 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act, the Development Plan for the site comprises the following:

- London Plan (2021);
- Richmond Local Plan (2018);
- Policies Map (2018);
- Material considerations include: the National Planning Policy Framework (NPPF) 2023; Planning Practice Guidance (PPG); regional and local supplementary planning guidance / documents (SPD/SPGs) and any other emerging policy and guidance and site-specific circumstances.

National Planning Policy Framework

5.4 The revised National Planning Policy Framework (NPPF) confirms that plans and decisions should apply a presumption in favour of sustainable development. For decision taking (para.11) this means:-

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 5.5 The Framework advises (para 38) that: *“Local planning authorities should approach decisions on proposed development in a positive and creative way Decision-makers at every level should seek to approve applications for sustainable development where possible.”*
- 5.6 Chapter 5 deals with housing supply and reflects the Government’s commitment to significantly boost the supply of homes. Paragraph 70 states: *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.”*
- 5.7 Paragraph 70 goes on to state that to promote the development of a good mix of sites local planning authorities should, amongst other matters *“support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”*.
- 5.8 Chapter 11 focuses on the ensuring the efficient use of land in meeting the need for homes. Paragraph 128 states decisions should support the efficient use of land having regard to identified housing need, amongst other matters.
- 5.9 Chapter 16 deals with conserving and enhancing the historic environment. Para. 205 states that when considering the impact of a proposed development on the significance of a designated heritage assets, great weight should be given to the asset’s conservation, with the greater the important the greater the weight. Para. 207 goes on to state that where a development 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.
- 5.10 With regard to non-designated heritage assets, paragraph 209 states *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*

The Development Plan

- 5.11 Development plan policies relevant to the determination of the current application comprise the London Plan 2021 and the Local Plan.

5.12 Relevant policies to the determination of the current application include:

London Plan 2021

- GG2 Making the best use of land
- GG4 Delivering the homes Londoners require
- D3 Optimising site capacity through design-led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D6 Housing quality and standards
- D12 Fire Safety
- H1 Increasing Housing Supply
- H2 Small Sites
- H4 Delivering Affordable Housing
- H10 Housing size mix
- HC1 Heritage Conservation and growth
- SI12 Minimising greenhouse gas emissions
- T5 Cycle parking

Local Plan

- LP1 Local Character and Design Quality
- LP3 Impact on Designated Heritage Assets
- LP4 Impact on Non-Designated Heritage Assets
- LP8 Residential Amenity and Living Standards
- LP15 Biodiversity
- LP16 Trees, Woodland and Landscape
- LP21 Flood Risk and Sustainable Drainage
- LP22 Sustainable Design and Construction
- LP24 Waste Management
- LP34 New Housing
- LP35 Housing Mix and Standards
- LP36 Affordable Housing
- LP37 Housing Needs of Different Groups
- LP44 Sustainable Travel Choices
- LP45 Parking Standards and Servicing

Publication Local Plan (Regulation 19)

The Richmond Publication Version Local Plan (Regulation 19 version) has been submitted to the Secretary of State for examination. The weight given to each

emerging policy depends on an assessment against the criteria set out in paragraph 48 of the NPPF. Where relevant, the proposal is considered against the emerging policies in Section 6.

- Policy 3 Tackling Climate Change
- Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency
- Policy 6 Sustainable Construction Standards
- Policy 7 Waste and the circular economy
- Policy 8 Flood Risk and sustainable drainage
- Policies 10, 11, 13 – New housing, Affordable Housing, Housing Mix & Standards
- Policy 12 Housing Needs of Different Groups
- Policy 28 Local Character and design quality
- Policy 29 Designated Heritage Assets
- Policy 39 Biodiversity and Geology
- Policy 46 Amenity and Living Conditions
- Policies 47 & 48 Sustainable travel choices, Vehicular Parking, Cycle Parking, Servicing and Construction Logistics Management

Supplementary Planning Documents

- Affordable Housing SPD (2014)
- Air Quality
- Design Quality
- Small and Medium Housing Sites
- Conservation Areas
- Refuse and recycling storage requirements
- Residential Development Standards and Housing Optional Technical Standards Update
- Sustainable Construction Checklist SPD

6.0 PLANNING POLICY COMPLIANCE

PRINCIPLE OF DEVELOPMENT/LOSS OF CARE HOME

- 6.1 The site comprises two formerly detached Victorian Villas which were converted into a care home in the 1970's. The resulting 'first generation' care home benefits from extensions and alterations added over time which linked the two original dwellings with later additions to the west, east and rear. The former care home was registered to accommodate 29 persons, and following a decline in occupancy its use ceased in December 2022 and has remained closed since.
- 6.2 **Policy LP37** deals with housing needs of different groups, which includes care homes, and states that the loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that:
- the accommodation is no longer needed, **or**
 - that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, **or**
 - the new accommodation will instead meet another identified priority local need.

Accommodation is no longer needed

- 6.3 Paragraph 9.4.5 of Policy LP37 states that the Older Peoples Supported Accommodation Review (2008) identified no additional requirements for residential care in the Borough, with adequate premises with nursing care and adequate affordable sheltered accommodation.
- 6.4 This policy has been retained as Policy 12 of the draft Local Plan, with more recent evidence provided in the background papers associated with the emerging Local Plan. The Housing LIN (December 2021) assesses market trends and states at paragraph 3.09;
- “At this stage considerations based on tentative evidence could suggest in the medium to longer term:*
- *There is potential for a downward shift in the preference for the use of residential care.*
 - *There is potential for a preference amongst older people to remain in their existing homes (whether owner occupiers or renters) with care if required.”* [our emphasis]

- 6.5 In paragraph 4.04, the Housing LIN states in relation to residential care (such as the former care home the subject of this application):
- “The estimated residential care net need to 2039 is c.140 bedspaces, for self funders and Council funded placements. It is possible that as a result of the Covid-19 pandemic some residential care home operators may exit the market. Based on the evidence of dementia prevalence amongst the older population, it is assumed that up to 50% of unmet need will be for dementia related needs.”*
- 6.6 In the emerging Local Plan (Regulation 19 version), the supporting text reiterates that 50% of estimated need (identified in the Housing LIN) could be met through the provision of mainstream housing, with encouragement to enable people to stay in their own homes. As a result of this, the need to deliver specialist housing for the aging population is fairly small, with a notable proportion of that need relating to dementia/other specialist housing rather than care homes. The evidence clearly indicates that specialist housing demand is moving away from residential care home settings.
- 6.7 This scheme is accompanied by a Market Analysis and Viability Appraisal (October 2024), prepared by leading experts in this field Christie & Co. This Appraisal carefully considers demand and supply and refers to the Richmond; Accommodation- Based Care Commissioning Statement. It concludes:
- “...[the] existing care provision within the Borough of Richmond upon Thames is sufficient to meet current demand requirements. This is supported by commissioning policy which reaffirms a priority for more alternative housing solutions for the elderly such as extra care and sheltered housing rather than residential care homes.”*
- 6.8 The analysis provided by Christies indicates that the Borough of Richmond Upon Thames has a balanced supply and demand for care provision, suggesting that future needs will focus on modern, fit-for-purpose facilities rather than increasing the total number of bed spaces. Further, future demand is focused more on other specialist forms of housing (extra care and sheltered housing) rather than care home accommodation.
- 6.9 Based on the submitted evidence, together with that of the Housing LIN it is concluded that care home provision within the Borough is sufficient with priority for other specialist housing taking precedent over the care home model of accommodation.
- 6.10 These findings align with the experience of Abbeyfields, an established and experienced care home operator and the previous owner of the site. They have confirmed that the closure of Victoria House was due to reduced demand and increasing voids in occupancy

which in turn rendered the facility unviable. This feedback from Abbeyfields aligns with the recognized trend of moving away from care home settings for the aging population.

6.11 It is further noted that the premises were actively marketed as a care home (please refer to the marketing report) and whilst there was initial interest from specialist housing providers, they were ultimately deterred from making formal offers. This was due to the perceived limited size of the plot, the unviable business proposition stemming from the age and restricted layout of the main buildings, and the high levels of capital expenditure required. The marketing exercise and feedback reinforce the lack of demand from providers to utilize this site for the provision of a care home/specialist housing.

6.12 Notwithstanding the above, it is self-evident on site that Victoria House experiences fundamental deficiencies which have contributed to its demise and lack of demand for the accommodation it provided whilst also deterring other providers from purchasing the site. These deficiencies are clearly set out within the Market Analysis and Viability Appraisal (October 2024) prepared by leading market experts Christie & Co.

6.13 Christie & Co conclude the fundamental specification deficiencies associated with Victoria House make it uneconomic to reopen and operate. These deficiencies include the low proportion of en-suites/no wetrooms, irregular size of bedrooms, narrow corridors, lack of step free access in parts of the building as well as the low gross internal area per bed. The report from Christies goes onto conclude that:

“We are of the opinion that Victoria House is not fit for purpose with the Property being fundamentally deficient in terms of specification and layout and materially below market standard norms”

and

“Given all these factors, we do not consider Victoria House to be operationally or financially viable.”

6.14 In order to remedy the operational obstacles that currently render the care home unviable it’s clear that substantial building operations would be required. This is in fact supported by the former operators who made the decision to close the home due to the *“financial unviability of the business and that the capital expenditure required to bring the Property up to a modern standard would be unlikely to be worthwhile in the current economic climate”*.

- 6.15 As examined within the report from Christie & Co, the property is made up of two converted Victorian homes and extensions (it is not purpose built) and whilst there may be scope to improve room sizes and upgrade en-suite facilities, the configuration of the home is materially impacted by the layout and constraints of the building and site itself. In the expert view of Christies, reconfiguring the home to meet market standards and operational requirements would only be possible following a full re-development.
- 6.16 A full re-development of the site to provide specialist purpose-built care home would inevitably lead to the loss of the BTM's whilst the potential impact of a large purpose-built care home on this constrained site could reasonably generate harm to the conservation area in which it is located. Furthermore, the redevelopment of the site for a residential care home would lose the opportunity to deliver substantial heritage enhancements (as discussed later within this report), including the removal of unsympathetic extensions, reverting the buildings back to their original use and reintroducing gaps and rhythm to the street scene.
- 6.17 In the alternate, if substantial building works were undertaken on this constrained site rather than a complete redevelopment, the provision of larger bedrooms with ensuite/wet rooms, enlarged corridors and circulation space together with improved communal and staff facilities would inevitably reduce the number of bed spaces. As evidenced in the report by Christie & Co, this does not align with current market practices in delivering residential care home facilities.
- 6.18 The tension between the level of investment and resulting bed spaces supports the conclusion of Christie & Co that it is simply not viable to re-open the care home in a manner that would enable it to meet current standards whilst also risking conflict with other policies seeking to protect and enhance BTM's and the conservation area.
- 6.19 The Council's background papers, feedback from the previous operator, the marketing exercise and the appraisal by Christie & Co all strongly indicate that there is no longer an identified need to retain Victoria House as a residential care home, nor is it viable to undertake works to bring the care home up to modern and required standards. In this manner, the first criteria of LP37 is satisfied.

Potential for alternative specialist housing/other considerations

- 6.20 It is relevant to consider whether Victoria House is suitable and/or viable for investment to deliver alternative forms of specialist housing and this is assessed within the report from Christie & Co.

- 6.21 The Market & Viability Appraisal finds that Victoria House would not be considered viable to provide other specialist care. It goes on to state:

“We note that from a specialist care perspective Victoria House would not be considered viable given the size of the Property. Referring to published national policy and CQC guidelines which highlight the importance of specialist services delivering ‘personalised care’ in smaller settings of 6-beds or less rather than larger facilities. Given the GIA of the building this would be unviable to provide a service of 6 beds or less.”

- 6.22 This lack of suitability for other specialist housing is reflected in the findings from the marketing exercise, with providers deterred by the configuration of the building and constrained site, the level of investment required and the unviable nature of the use.

- 6.23 In summary, the former care home closed in 2022 due to falling demand for bedspaces, a trend acknowledged in the Housing Lin and emerging Local Plan. The constraints of the buildings and site limit opportunities to develop or redevelop the site to provide a facility that would meet current standards (operational standards and market expectations). There is also clear tension between the level of investment demanded by this site and the viability of such.

- 6.24 The marketing exercise and specialist report prepared by Christie & Co further support the conclusion there is no demand for this operationally deficient care home and works necessary to bring it up to meet current/modern standards are simply not viable.

- 6.25 For these reasons, together with other material considerations considered within this statement, it is held that the loss of this deficient and unviable care home facility would not offend the objectives of Policy LP37 or conflict with the evidence base on which the emerging Local Plan is based.

- 6.26 Notwithstanding the above conclusion, there are other material considerations that strongly support this Proposal, as examined throughout this statement.

PRINCIPLE OF DEVELOPMENT/HOUSING DELIVERY

- 6.27 Richmond has a very high need for housing, whilst also having a variety of constraints to development including the River Thames, large areas of protected parks as well as a high quantum of open space designations and conservation areas. The combination of these factors generates a high need for housing but limited opportunities to deliver such.

- 6.28 Within the recently updated National Planning Policy Framework (NPPF) 2023, Chapter 5 continues to encourage local planning authorities to; *'support the Government's objective of significantly boosting the supply of homes'*.
- 6.29 Encouragement for the delivery of new housing is also expressed within the London Plan 2021, Policy LP 34 of the Richmond Local Plan (2018) and the emerging Local Plan Policy 10.
- 6.30 The significant need for housing within Richmond is further identified within the recent Local Housing Needs Assessment (LHNA) which forms part of the evidence base for the emerging Local Plan. Within this context, the Council have recently published their Housing Delivery Test score, which states only 92% of the overall housing target had been met over the past 3 years. Consequently, Richmond is now required to produce a Housing Delivery Test Action Plan, reinforcing the significant importance for the Council to focus on additional housing delivery.
- 6.31 The London Plan 2021 Policy H2 'Small Sites' states that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:
- 1) significantly increase the contribution of small sites to meeting London's housing needs
 - 2) diversify the sources, locations, type and mix of housing supply
 - 3) Support small and medium sized housebuilders; and
 - 5) achieve the minimum targets for small sites
- 6.32 The London Plan also refers to **"Incremental intensification"** of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary, with this expected to play an important role in contributing towards the housing targets for small sites. It goes on to recognise this can take several forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision, before concluding ***"These developments should generally be supported where they provide well-designed additional housing to meet London's needs."*** This site has a PTAL of 3 and is within 800mm of a station and this scheme sits squarely with the policy objectives of the London Plan in this regard.
- 6.32 In the context of the identified significant need for housing within the Borough, and reflecting the under delivery of such as highlighted by the requirement to provide a Housing Delivery Test Action Plan, this proposal offers an important opportunity to deliver much needed high quality housing.

- 6.33 The benefits arising from the contribution of 7no. dwellings would be in accordance with Policy LP35 and London Plan policy H2 which proactively supports new homes on small sites. Furthermore, it would reflect the policy objectives of emerging Policy 16 of the Local Plan (Regulation 19 version). For these reasons, the principle of residential use on this site is supported by the NPPF, the London Plan, the Local Plan and the emerging Local Plan. This attracts substantial weight.

HERITAGE & DESIGN

- 6.34 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area. Within this context, preserving means doing no harm.
- 6.35 Policy LP1 states the Council will require all development to be of high architectural and urban design quality and for the high-quality character and heritage of the Borough to be maintained and enhanced where opportunities arise. It further establishes that development is expected to demonstrate a thorough understanding of the site, how it relates to its context and take opportunities to improve the quality and character of buildings, spaces and the local area. Local Plan policy LP3 relates to designated heritage assets, including proposals within Conservation Areas. This policy sets out the requirement for development within such designated areas to conserve and where possible take opportunities to enhance the historic environment of the borough. This policy largely reflects the principles of the NPPF which also sets out the requirement to conserve and enhance the historic environment and goes on to state that great weight should be given to preserving designated heritage assets.
- 6.36 The application is accompanied by a Heritage Statement & Impact Assessment prepared by Dr. Barker-Mills of Barker-Mills Conservation and a Design & Access Statement prepared by Michael Jones Architects, the latter of which provides details of the analysis and design concept that underpin this scheme.

Heritage

- 6.37 The Heritage Statement & Impact Assessment sets out the significance of both designated and non-designated heritage assets potentially impacted by the proposals and provides a detailed assessment of impact.

- 6.38 The conservation area is noted as being characterised by residential streets of substantial two-two and a half storey detached and semi-detached villas set in substantial plots with continuous front boundary walls or railings to the street. The grain of the wider conservation area is distinguished by its historically consistent density, consistent building lines and general consistency of height and built form. The predominant materials are brick (yellow and red/orange) with timber sash fenestration, tiled roofs and exuberant timber detailing in the form of bargeboards.
- 6.39 With regard to the Buildings of Townscape Merit (BTM), the statement finds that the current buildings comprising numbers 2-4 Ennerdale Road are an agglomeration of ad-hoc extensions and additions around an historic pair of villas. These additions and the associated ad-hoc amendments to the front boundaries, including poor quality parking arrangements, have caused harm to both the conservation area and the BTM's. It is within this context that the scheme should be assessed.
- 6.40 The heritage assessment observes that most of the extensions and additions to the original buildings are proposed to be demolished and this better reveals the architectural significance of the historic villas and also re-establishes gardens to the rear. It is further concluded that the historic pattern of development is better revealed and the new development proposed to the west of Number 4 (plots 1 and 2) is consciously informed by the character and appearance of the existing villas.
- 6.41 Furthermore, the heritage statement finds the current incoherent boundary treatment to the front of the buildings, which includes significant missing stretches and poor-quality parking, is of no historic significance. The proposal allows for the frontage treatments to be redesigned to provide a coherent approach that reinforces the rhythm of the plot arrangement and provides dedicated paths and parking spaces. This is determined as being of benefit to the heritage assets.
- 6.42 Overall, the assessment finds no heritage harm would arise from the development, with a number of heritage benefits identified, including:
- Re-establishing the residential use of the historic buildings;
 - Removal of disfiguring additions to provide green space to the rear which is characteristic of the conservation area;
 - Removal of incongruous additions to the west of number 4 better revealing its historic form and thereby enhancing the conservation area;
 - Re-instatement of missing historic detailing including bargeboards and ridge cresting on Number 4

- Replacement of the extension with new paired villas that respond sensitively to the historic character and appearance of the conservation area;
- Reconfiguration of front boundary treatments and garden which enhance the street scene and the appearance of the conservation area.

6.43 These heritage benefits would not be realized if the change of use application was not pursued.

6.44 In the absence of harm, there is no requirement to identify public benefits that may outweigh and harm. However, it is material to note that this scheme delivers significant public benefits which include;

- the delivery of much needed family housing in a sustainable area and on a small site that reflects the focus of the London Plan and Local Plan.
- social and economic benefits will be achieved in relation to employment opportunities, investment into the area and additional residents to support local services and facilities.
- Substantial bio-diversity gains are secured which will positively contribute to sustainable development objectives.

Design

6.45 The Design & Access Statement clearly establishes the extent to which the site and its context have been carefully appraised, with opportunities recognized and seized to deliver enhancements to the character, appearance and visual amenities of the area.

6.46 In delivering enhancements to the BTM within the site and the character of the area more generally, particular regard has been paid to the spatial arrangement of built form on site, the rhythm and mass of development, access requirements, the proportions, scale and detailing of new built form and the ability to introduce meaningful landscaping.

6.47 As noted in the heritage statement, the original Villas, now linked, have been carefully treated, with original features reinstated where possible. In addition to the removal of modern linked extensions which better reveal the BTM, new porches have been introduced (whilst retaining those original to the Villas), the scale and detailing of which have been carefully balanced to retain the legibility and dominance of the original entrances.

6.48 At the eastern end of the site, single storey links between the BTM and the two storey extension will be removed to create a detached property, referred to as Plot 7. The detachment between this two-storey building and the BTM better reveals the original villas and creates an appropriate visual separation between the period and more modern

built form. This is of benefit not only to the BTM's but also better reflects and reinforces the spatial pattern of development in the area.

- 6.49 As part of the works, sliding sash windows are proposed and a new front door/porch created for Plot 7. This creates a better-balanced fenestration pattern and appearance and one that is more responsive to its context. The first-floor rear extension has been sensitively designed and would not be visually prominent or dominant. The existing car parking area at the eastern end of the site would be reduced in size, allowing part of it to revert to garden space. This is of benefit to the street scene and character of the area.
- 6.50 The existing built form at the western end of the site is considered harmful to both the setting of the BTM's and the wider conservation area. The removal of this less than sympathetic building offers the opportunity to create a pair of semi-detached dwellings, the siting of which has been detailed to provide an appropriate bridge between the building line of the property to the west and the BTM within the site. Indeed, the proposed properties would be set further back from the frontage than the existing building. The detached nature of these dwellings from the BTM and their siting creates a more appropriate and responsive pattern of development than currently exists.
- 6.51 The design of proposed plots 1 & 2 at the western end of the site has been carefully considered in terms of proportion, detailing and materials. The built form deliberately emulates and echoes the scale and appearance of the traditional villas which they would sit alongside. A shared porch detail enables the building to replicate the appearance of a detached villa, reinforcing the local character.
- 6.52 The extent to which the proposals not only respect the character of the area but enhance is evidenced when the existing street scene is contrasted with that proposed, as shown in Figure 6.1 below. These drawings clearly demonstrate the sensitive design approach that has been adopted and the visual enhancement to the quality and appearance of the site that would be achieved.

Figure 6.1 – Comparison between existing and proposed street scene which highlights the high-quality design approach adopted and the benefits this delivers to the character and appearance of the site and street scene



Above – Existing Street Scene



Above – Proposed Street Scene

6.53 Parking provision has been treated sensitively, with individual crossovers for each property proposed, together with defined frontages and landscaping. This reintroduces a rhythm to the appearance of the site and better reflects the arrangement of properties in the area, particularly when contrasted with the bank of parking currently provided within the site and ad hoc boundary treatment. Collectively, the scheme would secure an enhancement to the character and appearance of the site when contrasted to the existing arrangements.

Figure 6.2 – Individual parking spaces, front gardens and new boundary wall treatments



- 6.54 The proposal relies on high quality architectural detailing, materials and landscaping and enables not only the retention of the BTM's but an improvement to their visual quality and the contribution they make to the street scene and character of the area. The new buildings, and alterations to that retained as Plot 7, seize the opportunity to reinforce the character of the area and further enhance the appearance of the site and the contribution it makes to the street scene and neighbourhood.
- 6.55 The siting and design are entirely compatible with the historic and current spatial layout of the area and the architectural style of buildings in the locality. Overall, the design would integrate well with the character of the area.
- 6.56 The benefits to the BTM's and conservation area together with the overall uplift in design quality and appearance can only be realized through this application for a change of use with associated demolition and new build elements.
- 6.57 It has been clearly demonstrated that the proposal will comply with the requirement to conserve the significance of heritage assets and seizes the opportunity to enhance them and the visual amenities of the area more generally. For these reasons, the proposed development is not considered to have a harmful impact on the character and appearance of the Kew Conservation Area nor cause any other harm to the character and appearance of the area, in compliance with policies LP1, LP3 and LP4 of the Local Plan and paragraphs 205 and 209 of the NPPF (2023).

RESIDENTIAL DEVELOPMENT STANDARDS

- 6.58 Policy LP 35 of the Local Plan refers to the acceptability of the mix of housing, standards and layout.
- 6.59 Policy LP 35(A) states that development should generally provide family-sized accommodation, except within the five main centres and Areas of Mixed Use, where a higher proportion of small units would be appropriate. The site is neither within one of the five main centres and nor an Area of Mixed Use. The provision of 7no. family-sized dwellings is therefore compliant with policy and entirely in keeping with the prevailing housing mix of the area.
- 6.60 Policy LP 35(B) requires new housing to comply with the Nationally Described Space Standards (NDSS). The minimum standards are outlined below:
- A double bedroom should be 11.5sqm and 2.75m wide
 - A single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide

- Head height should be at least 2.3m for a minimum of 75% of the gross internal floor

6.61 Accompanying this application is a schedule of accommodation which demonstrates each dwelling would exceed the minimum space standards for overall size (GIA) and bedroom sizes. Figure 6.3 below shows a summary table demonstrating compliance with space standards.

Figure 6.3 – Space Standards

Minimum Gross Internal Areas (GIA) and Storage					
	No. of bedrooms / persons	Min. London Plan flat area (m ²)	Proposed flat area (m ²)	Proposed private amenity (m ²)	Proposed built-in storage (m ²)
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

6.62 Each property would benefit from good levels of daylight/sunlight and ventilation and would provide spacious and high-quality accommodation.

6.63 Policy LP 35(D) states that amenity spaces should be: private, usable, functional and safe; easily accessible from living areas; orientated to take account of need for sunlight and shading; of a sufficient size to meet the needs of the likely number of occupiers; and accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

6.64 Each dwelling would benefit from private garden space, the size of which is determined by the existing built form on size, particularly the plots relating to those parts of the building to be converted and having regard to the natural tapering of the site to the east. The private amenity spaces are private, usable, functional and directly accessible from the properties. Whilst the size is determined by the existing built form to a large degree, each unit would benefit from private amenity space sufficient to accommodate potential occupants. It is further noted that is additional recreational space within easy access for future occupants, in the event they sought such.

6.65 Policy LP 35(E) of the Local Plan requires all new build housing to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings'.

6.66 Building Regulations M4(2) Accessible and adaptable dwellings is not applicable to conversions and change of use applications and, consequently, is not relevant to those properties created through the conversion of the existing buildings. An Inclusive Access Statement is included as part of this submission to demonstrate compliance with M4(1) and M4(2) as relevant.

AFFORDABLE HOUSING

6.67 Policy LP36 of the Local Plan sets out the framework that requires contributions to affordable housing from all small sites, with further details set out in the Affordable Housing SPD. On the basis this scheme delivers 7no. units, 2 of which are new build and 5 via conversion, the combined contribution between these two elements is 30% with the commuted sum calculated using the pro-forma Annex A in the SPD.

6.68 The commuted sum has been calculated, as per the pro forma, and is provided together with a Viability Appraisal. The viability evidence finds a deficit, demonstrating the proposal cannot withstand the payment of a contribution to affordable housing. As such, the proposal is exempt from affordable housing contributions and in such circumstances is not contrary to Policy LP36. It is noted that this assessment will be independently reviewed as part of the application determination and the applicant hereby commits to underwrite the reasonable costs for such review.

6.69 Notwithstanding the evidence of the viability appraisal, the applicant is willing to make a **strictly without prejudice offer of £100k towards the delivery of affordable housing within the Borough.**

6.70 This offer is made at the discretion of the applicant and in recognition of the Borough wide need for affordable housing. This contribution would make an important contribution to an identified priority for housing and, as above, is offered without prejudice to the conclusions of the viability appraisal.

NEIGHBOURING AMENITIES

6.71 Policy LP8 of the Local Plan states that development proposals should seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

No.6 Ennerdale Road

6.72 No.6 Ennerdale Road is a substantial detached villa that lies to the west of the application site. It benefits from a detached outbuilding that lies along the boundary with the site and has a single flank window at the apex of the gable on its eastern elevation. The position of the relationship between this neighbouring property and the application site is shown in the image presented below at Figure 6.4.

Figure 6.4 – Aerial image showing the relationship between no.6 Ennerdale Road and the application site
(Source: Google Earth)



6.73 Plots 1 and 2 are proposed to replace the existing two storey modern wing that lies along the eastern boundary of the site. The siting of these units has been carefully appraised to ensure they not only bridge the natural change in building line along this part of the road but also to preclude harm to the neighbouring property.

6.74 The overall depth of the proposed properties is also stepped to include single storey elements at the rear, again to reduce impact to no.6, whilst the overall depth of Plot 1, is reduced when compared to Plot 2 to ensure the proposal would not appear visually overbearing or intrusive.

6.75 Having regard to the spatial arrangement and separation distances, no critical angle from the neighbouring properties rear facing windows would be obstructed. This supports the conclusion that the proposal would not appear visually overbearing or cause a harmful loss of daylight/sunlight. The relationship between Plots 1 and 2 and no.6 Ennerdale Road is shown in the CGI image below at Figure 6.5.

Figure 6.5 – CGI image showing the comfortable separation distance and relationship between Plots 1 & 2 and 6no. Ennerdale Road (in the foreground)

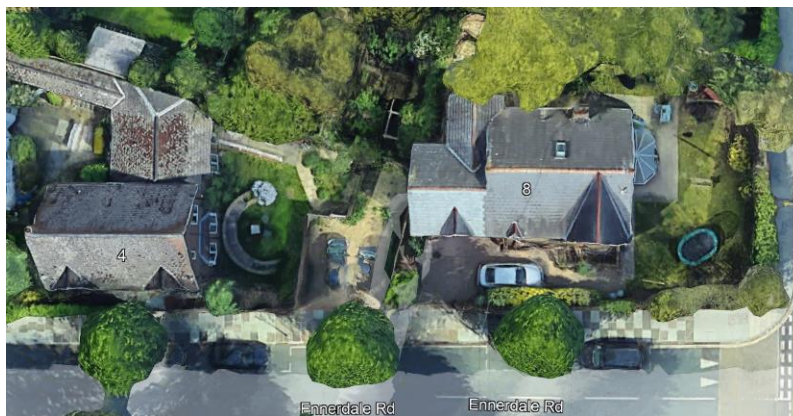


6.76 One flank window is proposed on the western elevation to serve a shower room. This window would serve a non-habitable room and would be obscure glazed, a matter that can be controlled by condition. The relationship between the rear first and second floor bedroom windows reflects the arrangement of properties in the area and would not lead to a material or harmful loss of privacy.

2a Ennerdale Road

6.77 No.2a Ennerdale Road lies to the east of the site, at the junction with Sandycombe Road. It comprises a detached, modern, two storey property with attached garage. The relationship between this adjacent property and the application site is shown in the images below at Figure 6.6.

Figure 6.6 – Aerial image showing the relationship between 2a Ennerdale Road to the east and the application site and a street view to show the separation and existing relationship (Source: Google Earth)





- 6.78 The conversion of the existing building to create Plot 7 includes a first-floor rear extension. Having regard to the separation distances between no.2 and the proposal, this would not appear overbearing or visually intrusive.
- 6.79 The existing building to be converted has 2no. first floor windows on its eastern elevation. The proposal would result in 3no. windows, serving bedrooms, facing east. These windows are between 13.5m – 14.5m from the boundary and would look towards the blank flank wall of no.2a. The window arrangement would not lead to a loss of privacy or overlooking problem.
- 6.80 There is an existing car parking area positioned along the boundary with no.2a. This would be reduced in size to provide only 1no. parking space. This arrangement would be compatible with the neighbouring property and would not lead to noise or nuisance.

14-22 Litchfield Road

- 6.81 No's 14-22 Litchfield Road lie to the north of the site and comprise substantial detached properties with large rear gardens. The relationship between these properties to the north is shown in the aerial image below.

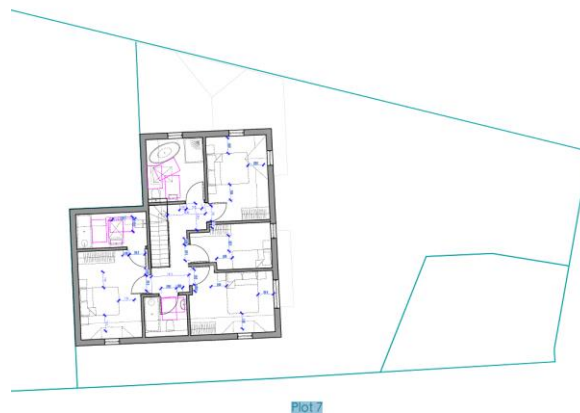
Figure 6.7 – The relationship between the application site and the properties to the north that front Litchfield Road (Source: Google Earth)



- 6.82 The depth of rear garden space for these neighbouring properties extends to between 26m-32m in length, with landscape features also present.
- 6.83 Plots 1 & 2 are sited at the western end of the site which has the greatest depth. As such, these proposed units are sited between 10.6m – 11.2m from the rear boundary. This relationship ensures the 2no. new build properties would not be visually overbearing, result in loss of light or cause overlooking to the properties to the north.
- 6.84 The remaining 5no. properties are created through the conversion, extension and alteration of the existing buildings on site. Several single storey rear extensions to the original Villa buildings will be demolished as part of the proposal which will increase the size of rear garden space.
- 6.85 Plots 3, 4 and 5, as proposed, include single storey extensions, with no changes to the first floor window arrangements, with these windows historically serving bedrooms. The single storey extensions would not cause harm to the amenities of the properties to the north. The window arrangements reflect those existing, with the exception of an additional on the rear elevation of Plot 5. The conversion and window arrangements would not lead to a material or harmful loss of privacy or overlooking problem.

- 6.86 Proposed Plot 6 is orientated such that its primary outlook is to the east, towards the blank flank wall of Plot 7. One additional window is proposed on the rear elevation, to serve a bedroom and this would be positioned more than 30m from the rear facing windows at no. 18 Litchfield Road. In the context of existing window arrangements and the separation distance to the properties to the north, this window would not cause material loss of privacy.
- 6.87 The first floor extension to proposed Plot 7 would be set more than 4m from the rear boundary and would not therefore span the full depth of the existing single storey projection, as shown on the drawing extract at Figure 6.7 overpage. The extension has been designed with a half-hipped roof and has low eaves height (reflecting the design of this part of the existing building). This sensitive design approach together with the separation distances to no. 16 Litchfield Road ensure it would not appear unduly prominent or intrusive.

Figure 6.8 – Proposed first floor of Plot 7 which includes a first rear floor extension



- 6.88 Two windows are proposed on the first-floor rear extension to Plot 7, one serving a bathroom and the other a secondary bedroom window. If deemed necessary, the secondary rear facing window could be obscure glazed. However, in view of the separation distances it is held this window would not cause loss of privacy.
- 6.89 For the reasons presented above, it has been demonstrated that the amenities of neighbouring occupiers would not be harmed, in compliance with Policy LP8 and the advice within the Council's SPD and the NPPF.

ECOLOGY/BIODIVERSITY & TREES

- 6.90 London Plan policy G6 requires that development proposals should manage impacts on biodiversity and aims to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Policy LP15 seeks to *“protect biodiversity in, and adjacent to, the borough’s designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value”* amongst other matters.
- 6.91 The scheme is accompanied by a Preliminary Ecological Appraisal, Bat Emergence and Re-Emergence Surveys and a Bio-diversity Net Gain report, all prepared by Arbtech.
- 6.92 The evidence of the survey work confirms the site has little bio-diversity value and there are no bat roosts within the buildings or site itself. The PEA and Bat Survey reports make several recommendations, all of which can be secured by way of condition.
- 6.93 Reflecting the current limited bio-diversity value of the site, the BNG concludes the proposal, which involves a reduction in the footprint of built form and the introduction of additional areas of garden/soft landscaping would deliver a significant **60% BNG** with a 100% net gain in relation to hedgerow (proposed to define some boundaries). The scheme therefore not only protects biodiversity and ecological interests but offers an important opportunity to secure meaningful gains, furthering Local Plan objectives and the positively responding NPPF advice.
- 6.94 Policy LP16 requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing or create new high quality green areas which deliver amenity and biodiversity benefits.
- 7.95 No trees would be removed as part of the proposal and the scheme is accompanied by a tree survey, AIA and AMS which demonstrate all trees beyond the application site would be appropriately protected.
- 7.96 As evidenced in the BNG report, the scheme will remove a considerable footprint of built form and re-introduce garden space to both the front and rear of the properties. The scheme will therefore deliver new soft landscaping in lieu of areas of hardstanding. The proposed arrangement and provision of additional planting will enhance the visual amenity of the site and wider as well as deliver substantial bio-diversity gains.

- 7.97 Having regard to the evidence submitted, the scheme would be wholly compliant with the requirements and objectives of Policies LP15 and LP16 of the Local Plan and the advice of the NPPF in this regard.

SUSTAINABLE CONSTRUCTION

- 6.98 Policy LP20 on Climate Change Adaptation states that new development should minimise energy consumption and the impact of overheating. Policy LP22 covering Sustainable Design and Construction states that where more than 1 new residential unit is proposed a Sustainable Design and Construction Checklist should be submitted. This should set out that the proposal is compliant with restricting water consumption to a maximum of 110L per person per day and should show a reduction of 35% carbon dioxide emissions. Policy LP 22 of the Local Plan states that developments should achieve sustainable design and construction in effort to mitigate the likely effects of climate change.
- 6.99 Emerging Policy 5.2 states that proposals should make the fullest contribution to minimizing carbon dioxide emissions in accordance with the Mayor’s energy hierarchy.
- 6.100 The scheme is accompanied by an Energy Report prepared by NRG Consulting. This document sets out the sustainability performance of the proposals and includes SAP calculations, water efficiency details and the manner in which the Be Lean, Be Clean, Be Green hierarchy is embraced. A sustainability checklist is also included as part of the evidence.
- 6.101 The Energy Report demonstrates that the new dwellings (plots 1 & 2) will achieve a substantial 60.7% reduction in CO2 and the conversion equating to 33.8%, giving an overall site reduction of 45.9%. The scheme is accordingly compliance with Policy LP22.
- 6.102 In addition to the above, the application is accompanied by a BREEM Pre-Assessment which demonstrates the properties created through the conversion and adaptation of existing buildings (Plots 3 – 7 inclusive) achieve an ‘excellent’ rating.
- 6.103 Overall, the scheme has been shown to significantly further sustainable design and construction objectives, in compliance with the NPPF, London Plan and Local Plan.

FLOOD RISK & SUSTAINABLE DRAINAGE

- 6.104 Policy LP21 Part A requires all development to avoid or minimize, contributing to all sources of flooding taking into account climate change and without increasing the risk of flooding elsewhere. London Plan SI13 requires development proposals to aim to achieve greenfield run-off rates and follow the drainage hierarchy.

- 6.105 The application is accompanied by a Flood Risk Assessment (FRA) and SuDs strategy. The FRA concludes:
“A review of flood risk from all other sources, has been undertaken, with flood risk to the site considered low from all sources assessed (including Fluvial, Surface Water Groundwater and Sewer flood risk).... Flood Hazard is very low through the site and through the access point onto Ennerdale Road. Therefore, suitable access and egress is available during a storm event. It is advised that should site evacuation be required, users are directed south onto Ennerdale Road, then east towards Sandycombe Road.”
- 6.106 The FRA therefore demonstrates the proposals can be accommodated within the site in accordance with the EA guidance, Council SFRA, and the NPPF.
- 6.107 A Foul and Surface Water Drainage Strategy Report has been prepared for the scheme and comprises part of the submission. The drainage strategy includes surface water discharge from the site is to be split into two separate locations. Plots 1, 2 and 7 are to be discharged into ground via infiltration at an assumed rate of 1×10^{-5} m/s. The surface water runoff from Plots 4, 5, 6 and 7 are to be discharged into the local surface water sewer within Ennerdale Road at a restricted rate of 2.0 l/s. All SuDS features have been designed to cater for the 1 in 100-year +45% storm.
- 6.108 The foul water will discharge into an existing foul water sewer within Ennerdale Road via a new connection into an existing private foul water chamber on site. Remedial works are required. Due to the revision of the drainage network which serves the site; the surface water connection into the existing foul water sewer is to be removed which will alleviate flows from the overburdened foul sewer. The flows are then to be discharged into the larger surface water sewer at a restricted flow rate which provides a 67% betterment within the 1 in 2-year storm.
- 6.109 The FRA and Foul and Surface Water Drainage Strategy Report demonstrate the proposals are compliant with Policy LP21 of the Local Plan and policy 8 of the emerging Local Plan, as well as the NPPF and London Plan.

PARKING/CYCLE STORAGE AND HIGHWAY SAFETY

- 6.110 Policy LP44 of the Local Plan states that the Council will work in partnership to promote safe, sustainable and accessible transport solutions which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions. Policy LP45 deals with parking provision to avoid unacceptable impact on on-

street parking conditions. The Council's Transport SPD and Recycling and Refuse Requirements SPD are also relevant.

- 6.111 The site is in an accessible location and whilst it has a PTAL 3, it is within 200m of a tube station with easy access to the local bus network.
- 6.112 A Technical Note prepared by Motion is submitted as part of this application and addresses the sustainability/accessibility of the site, parking, access and cycle storage matters.

Access & Parking

- 6.113 Access to six of the residential dwellings would be achieved via new individual crossovers on the northern side of Ennerdale Road. A total of six new crossovers are to be provided on Ennerdale Road, with the seventh property relying on an existing crossover at the eastern end of the site. The crossovers have been designed in accordance with standards contained in London Borough of Richmond's 'Highways Authority Requirements' Supplementary Planning Guidance Document (November 2023).
- 6.114 The site is located within a Public Transport Accessibility Level (PTAL) area of 2/3. The London Plan parking standards, as contained within the Local Plan, permit up to 1 parking space per unit. The scheme is compliant with this in providing 1 parking space per dwelling. The spaces are compliant with the guidance on such.
- 6.115 In delivering access and parking for each unit, a total of three on-street parking bays would be lost. Parking beat surveys have been undertaken in accordance with the established 'Richmond Methodology' (full details of which are provided in the Technical Note). The parking survey identifies 258 parking spaces within a 200 metre radius of the site and, across the three study periods, parking demand averages only 51% (with 52% being the highest level of demand).
- 6.116 The analysis within the Technical Note demonstrates the loss of 3no on street parking bays would result in parking stress at 51%, substantially below 85% which is the threshold for high occupancy within parking stress surveys.
- 6.117 It is therefore concluded that the development proposals will not adversely impact local parking availability within the vicinity of the site and will achieve appropriate access and on site parking arrangements per property.

Cycle Parking

- 6.118 The application includes cycle parking spaces (2 spaces) accordance with the minimum standards set out in Table 10.2 of the London Plan (2021) and London Cycle Design Standards. These would be provided to the rear of the dwellings. Details can be secured by way of condition. It is respectfully suggested that such a condition should require the submission and approval of details prior to occupation rather than commencement of development.

Servicing and Refuse Collection

- 6.119 The proposal includes bin storage discreetly located forward of each property. The bins would be accessible to future occupants and residents would be responsible for positioning refuse bins kerb side for collection, as occurs for other residential properties in the area. Details of the bin store can be secured by way of condition, with a requirement for details to be submitted and approved prior to occupation.
- 6.120 Fire tenders and ambulances can stop on Ennerdale Road.
- 6.121 A Framework Construction Traffic Management Plan is also submitted in support of the application, the purpose of which is to outline the strategy for the efficient movement and management of all demolition and construction traffic associated with the site. The report considers the residential nature of the surrounding area, in addition to sensitivities including noise and disturbance. This Framework Construction Traffic Management Plan considers the Transport for London (TfL) 'Construction Logistics Plan Guidance' (2021).
- 6.122 Overall, the submitted reports demonstrate the proposal is compliant with Policies LP44 and LP45 of the Local Plan, the London Plan and policies T5 and T6 of the emerging Local Plan.

FIRE SAFETY

- 6.123 Policy D12 of the London Plan seeks to ensure that all development proposals achieve the highest standards of fire safety. Policy 44 of the emerging Local Plan provides similarly and includes a requirement for all developments to include a Fire Safety Strategy.
- 6.124 A Fire Statement has been prepared and is submitted as part of the application submission. This document outlines the measures which have been adopted to prevent fire spread and ensure the protection of life in the event of a fire within the buildings, thus fully complying to the requirements of planning policy.

7.0 CONCLUSIONS

- 7.1 This Planning Statement has been prepared on behalf of Park Property (Kew) Group Ltd to support a full planning application for the development of 2-4 Ennerdale Road to deliver a high-quality scheme of 7no. new dwellings.
- 7.2 Paragraph 11 of the NPPF states that in applying the presumption in favour of sustainable development, for decision-taking, this means approving development proposals that accord with an up-to-date Development Plan without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in NPPF as a whole.
- 7.3 This statement has assessed the proposal against the prevailing planning policy framework, having regard to all material considerations. It demonstrates that the scheme is fully compliant with Development Plan policies, including the London Plan, and having regard to the Planning Guidance SPD and the NPPF. Furthermore, no adverse impacts of granting planning permission, which would demonstrably outweigh the benefits of the development when assessed against the policies in the NPPF as a whole, have been identified. There is, accordingly, a clear presumption in favour of granting planning permission for this high-quality development.
- 7.4 To help reinforce this conclusion, compliance with development plan policy and the NPPF, together with the benefits this scheme would accrue, can be summarized as follow:
- The existing care home closed due to decreasing demand for bed spaces and fundamental deficiencies associated with the building layout and site. During a period of marketing, specialist housing providers were deterred from making offers having regard to its deficiencies, building and site constraints and the viability of bringing the care home up to current standards.
 - The Market Analysis and Viability Appraisal prepared by Christie & Co examines the fundamental deficiencies of the existing care home and the lack of viability to develop it to meet current standards (or market expectations). These findings are reinforced by the feedback received during the period of marketing.
 - The Market Analysis and Viability Appraisal examines current demand and supply and reiterates the findings of the commissioning policy which identifies a greater priority for alternative housing solutions such as extra care and sheltered housing rather than residential care homes. The declining demand for Victoria House reflects this.
 - From a specialist care perspective, it has been demonstrated that Victoria house would not be viable. Accordingly, the evidence strongly indicates there is no demand

for the care home facilities at Victoria House and this care home is no longer needed to meet specialist housing provision within the Borough. In such circumstances, Policy LP37 does not preclude the loss of this care home for the delivery of much needed housing which is now also a significant priority for the Borough.

- The delivery of 7no. high quality and well-designed dwellings on this small and sustainably located site are fully supported and indeed promoted by Policy H2 of the London Plan whilst also positively reflecting the Government's commitment to boost the supply of housing.
- In the context of the identified significant need for housing within the Borough this proposal offers an important opportunity to deliver much needed high-quality family housing, in compliance with Policy LP35 of the Local Plan and merging Policy 16 of the Local Plan (regulation 19 version).
- This sensitively designed and high-quality development has been shown to deliver substantial heritage benefits to both the conservation area and the BTM's, better revealing the architectural significance of the villas and historic pattern of development, re-establishing gardens to the rear and reintroducing rhythm through a consistent frontage treatment.
- The new development proposed to the west of the site (plots 1 and 2) is consciously informed by the character and appearance of the existing villas. The development is based on principles of good design and would deliver enhancements to the character and appearance of the area.
- Neighbouring amenities would be protected, and the scheme would not prejudice highway safety or create parking stress.
- The scheme will deliver substantial bio-diversity gains and cause no harm to protected species.
- The scheme is sustainably designed and would exceed carbon reduction targets within the Local Plan. There is no flood risk, and the drainage strategy would alleviate the pressure on the existing systems.
- At the applicant's discretion and strictly without prejudice to the findings of the Viability Appraisal, a financial contribution is offered towards the delivery of affordable housing within the Borough.

7.5 The optimization of the site to deliver new homes, an identified priority for the Borough, and secure the substantial heritage and sustainable gains associated therewith should therefore be strongly supported. The presumption in favour of sustainable development should be applied such that planning permission is granted without delay.