



TOWN & COUNTRY PLANNING CONSULTANTS

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

BS/JLA_479

BY-E-MAIL

5 December 2024

Dear Sir or Madam,

**RE: 1 TOWER ROAD, TWICKENHAM, TW1 4PD
HOUSEHOLDER PLANNING APPLICATION: TWO STOREY SIDE EXTENSION
AND SINGLE STOREY REAR EXTENSIONS
COVERING LETTER: SUPPORTING PLANNING ASSESSMENT**

This letter – Supporting Planning and Heritage Statement, is submitted to the London Borough of Richmond upon Thames (“Council”), on behalf of Mr Ylli Kadiu (“Applicant”), in support of a Householder Planning Application (“Application”) for the: *“Demolition of the existing garage and erection of single-storey rear extensions and a two-storey side extension”* (“Proposal”) at 1 Tower Road, Twickenham, TW1 4PD (“Site”).

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

- Existing and Proposed Drawings prepared by CUBO Design Ltd.
- Fire Strategy Statement prepared by CUBO Design Ltd.

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

The contents of this letter are as follows:

- | | |
|-------------------------------------|--------------------------------------|
| 1. Background & Objectives (Page 1) | 4. Planning Policy Position (Page 5) |
| 2. Site Details (Page 2) | 5. Planning Considerations (Page 6) |
| 3. Proposed Development (Page 4) | 6. Conclusions (Page 10) |

1. BACKGROUND & OBJECTIVES

The Applicant is the owner of the Site and seeks to modify, adapt and improve the dwelling to ensure it makes efficient use of the property as a family home.

The proposed development is also intended to achieve the important planning aims of regeneration and sustainable development, arising out of the Site's particular characteristics and Applicant's unique circumstance, together with the existing planning policy context.

The key objectives of the proposals are:

- Making efficient use of the Site while preserving and enhancing the character and appearance of the dwelling and wider street scene
- Preservation of neighbour amenity
- Preservation of local highway conditions

2. SITE DETAILS

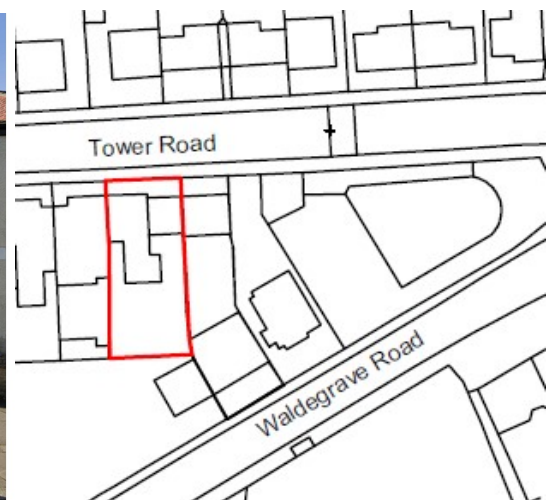
i. Site Description

The Site comprises a two-storey semi detached dwelling on the south side of Tower Road and orientated on a north-south axis. The dwelling has a two storey closet wing and a detached single garage to the side of the Site. The Site is bordered by housing to the east, south and west.

Site Photograph: Front Elevation of the Site



Site Location Plan



ii. Context

While the Site forms part of a small group setting with No. 3, 5 and 7 (being bay fronted semi detached dwellings with deep closet wings), Tower Road is varied in housing typologies and character. In the immediate vicinity, the north side of Tower Road is dominated by two storey terraced housing. To the east, and beyond the two storey annexe of 313 Waldegrave Road, the junction of Tower Road and Waldegrave Road is dominated by the 3 storey flatted development of Tower Point.

Given the taper of Tower Road and Waldegrave Road, the rear elevations of housing on Waldegrave Road (No's 313 and 315) are visible from Tower Road.

Further west of the Site, the housing is more varied, with a mix of semi detached, detached, terrace housing and bungalows.

The Site is situated in the 'Bonser Road and surrounds' character area (as set out in the Strawberry Hill Village Planning Guidance SPD), which provides a more detailed character assessment on the wider location, although there is little reference made to the east section of Tower Road.

The site is not statutorily or locally listed, nor sited in a conservation area. There are no heritage assets in close proximity to the Site.

The Site is in Flood Zone 1 and is not identified as being susceptible to surface water flooding although the very rear of the Site is identified as being in a 1 in 1000 year risk of flooding.

The area is susceptible to a medium risk (50%-74.9%) of Ground Water Flooding according to the Council's SFRA.

Google Map: Aerial Photograph of the Site & Surrounding Area (as seen from the north)



iii. Planning History

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

[24/2864/PS192](#)

L-shape rear dormer roof extensions. Rooflights to front elevation. Will require demolition of existing roof.

In Progress

[74/0389](#)

Erection of a 2-storey extension at the side comprising double garage with bedroom over.
Refused Permission 26/07/1974

3. PROPOSED DEVELOPMENT

The Proposal comprises the demolition of a detached garage and erection of a two-storey side extension, set back from the façade of the dwelling by 1m and in from the boundary with 313 Waldegrave Road. The two storey side extension would project beyond the rear elevation, with part adjoining the existing outrigger. The proposed roof over the side extension would be hipped with a flat roof to the part width rear projection.

To the rear of the dwelling and to the sides of the existing two storey outrigger, a pair of flat roof single storey rear extensions are proposed, which would align with the rear elevation of the outrigger. One of the rear extensions would extend beyond the proposed two storey side extension.

Proposed Elevations



4. PLANNING POLICY POSITION

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

- National Planning Policy Framework ("NPPF") (2023)
- The London Plan (2021)
- Richmond upon Thames Local Plan ((2018):

Key policies comprise, but are not limited to:

- LP 1 Local Character and Design Quality
- LP 8 Amenity and Living conditions
- LP21 Flood Risk and Sustainable Drainage
- LP45 Parking Standards and Servicing
- Richmond Publication Local Plan (Regulation 19 version)

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

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

- [Richmond upon Thames Online Proposals Map](#)



There are no on-site planning designations or constraints.

- Richmond upon Thames Supplementary Planning Guidance/Documents:
 - Design Quality (2006) SPD
 - House Extensions and External Alterations (2015) SPD
 - Village Planning Guidance – Strawberry Hill

5. PLANNING CONSIDERATIONS

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

- Design
- Neighbour Amenity
- Other Material Considerations

i. Design

Policy Position

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

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

To ensure development respects, contributes to and enhances the local environment and character, the following will be considered by the Council when assessing proposals:

- Compatibility with local character including the relationship to existing townscape; development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
- Sustainable design and construction, including adaptability, subject to aesthetic considerations;
- Layout, siting and access, including making best use of land;
- Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
- Inclusive design, connectivity, permeability, natural surveillance and orientation; and,
- Suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

Within Paragraph 4.1.3, Local Plan Policy LP1 requires developers and applicants to take a sensitive approach to the architectural design of new buildings, extensions and modifications to existing buildings, as well as landscape proposals. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be to a high quality. Schemes should be based on a sound understanding of the site and its context, following the locally specific guidance set out in the Village Planning Guidance SPDs.

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

The House Extensions SPD states that as a guidance principle: *"the external appearance of any extension must be carefully designed in order to avoid the visual confusion that can result when the style and materials of the original house are ignored."*

In relation to extensions, the SPD states that: *"the overall shape, size and position of side and rear extensions should not dominate the existing house or its neighbours. They should harmonise with the original appearance, which should be taken as the starting point for any future changes."*

For side extensions in particular, the SPD states that: *"the extension is made to appear as an obvious addition which is subordinate to the main structure, so that the original form can still be appreciated. In such circumstances, the ridge of the extension should be set lower to that on the main house".* Additionally, the SPD states that *"where the extension is to be subordinate to the existing house it is usually desirable to set back the extension by at least 1 metre behind the front elevation."* For two storey side extensions, the SPD states that these *'should not be greater than half the width of the original building to ensure the extension does not over-dominate the building's original scale and character.'* The guidance adds that *'Development, which would result in the significant reduction of an existing important space or gap between neighbouring houses, is not normally acceptable. In conjunction with existing extensions to neighbouring buildings this can have a terracing effect on the street. Consequently, two storey side extensions should be sited 1m from the side boundary.'*

In relation to single storey rear extensions, the SPD states that *"the effect of a single storey extension is usually acceptable if the projection is no further than 3.5m for a semi detached house."*

Policy Justification

The proposed rear extension would conform with the objectives set out in the aforementioned SPD. While the rear extensions would have a depth of 6.15m, these would be no deeper than the existing outrigger and would be marginally deeper than the adjacent rear extension at No. 3 Tower Road (0.958m) and those seen at No. 5 and 7 Tower Road. The single storey rear extensions would have a flat roof that would be set below the first floor windows and comprise a modest width beyond the existing outrigger. As a result, the extensions are considered to appear proportionate in scale and form and subservient to the dwelling.

In accordance with the SPD, the proposed two-storey side extension would be set back from the façade by 1m with the corresponding eaves and ridge of the roof lower in comparison to main dwelling. While the width of the proposed side extension would be marginally wider than half the width of the dwelling, the set back from the façade and lowered eaves and modest hip roof would appear as a subservient addition to the dwelling, respectful of the scale and proportions of dwelling and semi detached pair of which it forms part. It is therefore considered that the proposed side extension would comply with the aims and objectives of the SPD, ensuring the extension would appear subservient.

The Site and area to the east of the proposed side extension adjoins the rear garden of No. 313 Waldegrave Road. While no dwelling exists on the Tower Road frontage, a two storey flat roof annexe forms part of the street scene. Consequently, the flank wall of the proposed side extension would be set off the shared boundary by 0.9m, widening to 1.08m as the boundary tapers. It is considered this is sufficient to ensure no 'terracing' with the annexe of No. 313 Waldegrave Road.

The overall design of the side extension is sympathetic and while remaining subservient with the host dwelling, the proposed ground floor bay window and similar fenestration allows the extension to assimilate successfully. Materials would also match the existing dwelling to ensure continuity (rendered walls and matching roof tiles).

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

ii. Neighbour Amenity

Policy Position

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

The Council will ensure:

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

Policy Justification

As set out above, the proposed single storey rear extension would only marginally project beyond the existing rear extension at No. 3 Tower Road and as a result, it is not considered that the Proposal would give rise to an unreasonable impact on this property.

In relation to No. 313 Waldegrave Road, the proposed side and rear extension would project beyond the annexe sited at the rear of the property. The annexe comprises a ground floor garage with a play/storage room on the first floor and thus not considered habitable.

It is noted that a planning application (ref. 22/1985/FUL) to convert this annexe to a self-contained flat has been under consideration since 2022, with the proposed floor plan comprising a ground floor garage and open plan upper floor studio flat.

The proposed two storey side and rear extension would project beyond this annexe modestly and the first floor rear projection would be set in from the boundary and staggered away from the annexe so as not to impinge on a 45 degree line taken from the nearest window.

The development ensures that there would be suitable separation between the Proposal and the rear elevation of the dwelling of No. 313 Waldegrave Road. While the extension would inevitably be seen from the rear of the dwelling and garden, it is not considered that this would manifest itself in a dominant or overbearing manner. Mutual overlooking of gardens is commonplace, particularly as the rear elevation of No. 313 is orientated towards the rear elevation of the Site. Of the two proposed first floor windows in the rear elevation, one would serve a bathroom and be obscure glazed with the other serving a bedroom and significantly recessed from the rear elevation of No. 313 (noting that their first floor windows are high level windows). The Site lies to the north of No. 313 and as such, no overshadowing of the property is envisaged and given the separation, it is not anticipated that the Proposal would result in an unreasonable loss of daylight to No. 313.

As a result, the Proposal would not result in a detrimental impact on the amenities enjoyed by the occupants of adjacent properties and would comply with the objectives of Local Plan Policy LP8.

iii. Other Material Matters

Parking

While the Proposal would result in the loss of a garage, this is very small, having a garage door width of less than 2m and does not accommodate most modern vehicles. As such, there is no loss of off street parking spaces as a result of the Proposals and local highway conditions are not considered to be prejudiced.

The Applicant is willing to enter into any necessary agreement to reinstate the dropped kerb.

Flood Risk

The proposed extensions are not sited in any area at risk from flooding and floor levels will be no lower than existing. While there is a minor susceptibility to ground water flooding, no basement excavation is proposed, and the development relates to a householder application.

CIL

The Proposals are CIL liable but the proposed gross internal floor area proposed falls below the 100sqm threshold.

6. CONCLUSION

The Site is occupied by a two-storey semi detached dwelling and the proposals comprise single storey rear extensions and a two-storey side extension.

The proposed single-storey rear extension would be modest in scale and proportionate to the dwelling, appearing as a subservient element.

Similarly, the proposed two-storey side extension would appear as a subservient addition to the dwelling, being set back from the facade of the dwelling with a lowered ridge and eaves to the roof. The proposed flank wall of the proposed side extension would be set off the shared boundary to ensure no terracing or closure of gaps in the street scene.

For the reasons set out above, it is not considered that the Proposal would detract from the character and appearance of the dwelling, semi detached pair of which this forms part and the wider streetscape.

Given the relationship with neighboring properties, it is not considered that the Proposal will give rise to an unreasonable impact on amenity or the wider visual amenities of the locality.

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

Yours faithfully,

Bryan Staff B Tech TRPI
Director

M: 07807 914 155
E: bryan.staff@jl-a.co.uk