

Householder Planning Statement

32 Park Road, Twickenham,
Middlesex, TW1 2PX

Proposed part single/part two storey rear
extension and 1 No. rooflight in front roof
elevation



RTPI

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Project reference: **PR4290**

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Contents

1	Introduction	3
2	Site Context.....	4
3	Relevant History	5
4	Proposed Development	6
5	Planning Policy	7
6	Planning Assessment	10
7	Conclusions.....	18

1 Introduction

1.1 This Householder Planning Statement has been submitted in support of an application for the following development at 32 Park Road, Twickenham, Middlesex, TW1 2PX (hereafter referred to as 'the Site'):

Proposed part single/part two storey rear extension and 1 No. rooflight in front roof elevation

1.2 The proposed development affects the following Land Registry title(s):

Title Number	Description	Owner
MX82027	32 Park Road, Twickenham, TW1 2PX	The Applicants

1.3 The application is accompanied by the following plans and documents:

- 4290.ON – Planning Statement
- 202308 - LON - 00 - 10 - Site and Block Plan - Ro
- 202308 - LON - 00 - 101 - Ground and First Floor Plan - Existing - Rev 1
- 202308 - LON - 00 - 102 - Second Floor and Roof Plan - Existing - Rev 1
- 202308 - LON - 00 - 300 - Section A-A - Existing - Rev 1
- 202308 - LON - 00 - 400 - Front and Side Elevation - Existing - Rev 1
- 202308 - LON - 00 - 402 - Rear and Side Elevation - Existing - Rev 2
- 202308 - LON - 20 - 10 - Block Plan - Rev 1
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- 202308 - LON - 20 - Planning Drawing - Rear Extension - Elevation - F & S - Ro.p
- 202308 - LON - 20 - Planning Drawing - Rear Extension - Elevation - R & S - Ro.p
- 202308 - LON - 20 - Planning Drawing - Rear Extension - Section A-A - Ro.pdf
- 202308 - LON - 20 - Planning Drawing - Rear Extension - SF & R - Ro.pdf
- 202308 - LON - 20 - Planning Drawing - Rear Extension-Floor Plan - GF & FF - Ro.
- 202308 - LON - 77 - Planning Drawing - Right to Light Study - Ro.pdf
- AC.2024.301 32 Park Road Twickenham TW1 2PX BS5837 Tree Report.pdf
- AC.2024.301 TP-01 Rev A-A3 Portrait.pdf
- AEG3755_TW1_Twickenham_07

2 Site Context

- 2.1 This Site is located on the NE side of Park Road and occupies approximately 400 sqm of land. It is in residential use and comprises a semi-detached two-storey dwelling set within a rectangular plot predominately surrounded by other residential dwellings of varying scales and designs, including three-storey apartments to the NW and the listed Bute Lodge almost directly opposite.
- 2.2 Vehicular access exists on to Park Road to the west, with a hard surfaced driveway providing capacity for two parked vehicles.
- 2.3 The Site itself had two street facing bay windows (currently under renovation to reflect 24/1134/HOT) whilst the house consists of red brick and white render. The roof is made from off red tiles and has 1 front facing velux windows. To the rear there was a large dormer window that looks out over the garden that consists of a Juliette balcony (currently under renovation to reflect 24/1049/HOT)
- 2.4 The entire Site comprises of dense soft landscaping with the front driveway and garden being naturally well shielded by dense bushes and trees that belong to both the Site and the neighbouring properties.
- 2.5 This Site is the subject of the following planning constraints and characteristics:
- Within St Margarets and East Twickenham village
 - Within Flood Zone 3 (high risk of flooding from rivers and the sea)
 - Within Critical Drainage Area
 - Within area subject to Article 4 Direction relating to basements
 - Opposite Grade II Listed Blue Lodge
 - Opposite Twickenham Park Conservation Area (including Bute Lodge)
 - Close to Richmond Riverside Conservation Area (NW of 26 Park Lane)
 - Adjacent to Beresford Avenue Conservation Area (land to rear including adjoining 1 Beresford Avenue)
 - Opposite a number of trees that are subject to a Tree Preservation Order (at Blue Lodge)

3 Relevant History

3.1 The following records are understood to be relevant to the Site:

[83/1369](#) - Erection of a bay window to the front of the garage in connection with its use as a habitable room. Granted 16/12/1983.

[24/0200/HOT](#) - Alterations to the existing front facade: New roof to match neighbouring property, new windows & new eyebrow window. Ground floor rear extension. First floor side and rear extension. Extend and Alterations to existing loft dormer to the rear. Internal alterations. Refused 18/3/2024 on grounds relating to design, neighbour amenity and the potential loss of trees.

[24/1049/HOT](#) - First floor side and rear extension. Extension and alterations to existing loft dormer to the rear. Granted 11/6/2024.

[24/1134/HOT](#) - Alterations to roof lights. Front gable roof addition. Alterations to fenestration including replacement. Removal of the hipped roof to south elevation. Granted 5/6/2024.

[24/1802/PS192](#) - Application seeking lawful development certificate for proposed single storey and two storey rear extensions. Refused 11/09/24 on grounds relating to visual appearance (shape, colour and size of proposed window frames) and pitch of proposed roof.

[24/2373/PS192](#) - Application seeking Lawful Development Certificate for proposed single storey and two-storey rear extension. Granted 18/11/2024.

4 Proposed Development

4.1 The application entails the following elements:

- Part single, part two storey rear extension and 1 No. rooflight to front
- Single storey element to be 3.37m wide and extend 3m from the rear wall
- Single storey element to also include roof light
- Two storey element to be 5.58m wide and extend 4.5m from the rear wall
- Staggered nature on north elevation
- 2 sets of heritage doors on the ground floor
- 2 no. rear facing window on the first floor
- Kitchen/diner and master bedroom to be increased in size as a result
- External finish to become white render in part
- Front roof light to serve existing bedroom
- 7 No. trees to be planted along the northern boundary
- Proposed patio to the rear of the dwelling.

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 38 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

Development Plan

- 5.5 It is understood that the Development Plan for Twickenham, which forms a part of the London Borough of Richmond upon Thames, comprises the following documents:

- Richmond Local Plan (RLP) (July 2018);
- The London Plan (LP) (2021).

5.6 In the RLP, the following policies are considered most relevant in connection with the proposed development:

- Policy LP1 - Local Character and Design Quality
- Policy LP8 – Impact on Amenity and Living Conditions
- Policy LP16 – Trees, Woodlands and Landscape
- Policy LP21 – Impact on Flood Risk and Sustainable Drainage

5.7 It is important to note that the Richmond Publication Version Local Plan (regulation 19 version) was published on 9th June 2023 for public consultation which ended on 24th July 2023. This document should be considered as a material consideration and weight should be given to each of the emerging policies which are as follows:

- Policy 8 – Flood Risk and Sustainable Drainage
- Policy 28 – Local Character and Design Quality
- Policy 46 – Amenity and Living Conditions

5.8 The LP offers the overall strategic plan for London whilst setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The relevant policies from The London Plan are as follows:

- Policy D4 – Delivering good design.

Other Material Considerations

The Framework

5.9 In summary, the following paragraphs are considered most relevant as additional material considerations in the determination of this application:

- Paragraph 7 – Achieving sustainable development.
- Paragraph 8 – Three overarching objectives for sustainable development.
Paragraph 131 – Fundamentality of high quality, beautiful and sustainable buildings.
- Paragraph 132 – Setting out clear design visions and expectations.
- Paragraph 135 – Criteria for achieving well-designed and beautiful places

- Paragraph 205 – Proposals affecting heritage assets

Further material considerations

- House Extensions and External Alterations SPD (May 2015)
- St Margarets and East Twickenham Village Planning Guidance

6 Planning Assessment

Key Issues

- 6.1 The proposed householder development has been assessed by Graham Simpkin Planning against the following key matters:
1. Principle of the Development
 2. Character, Design and Appearance
 3. Impact on Heritage Assets
 4. Flood risk
 5. Impact on Landscaping
 6. Amenity of Future Occupiers and Neighbours

1. Principle of the Development

- 6.2 To begin with, it is worth noting that the dwelling has recently been the subject of a certificate of lawfulness on the 18th of November 2024 for the proposed erection of a single storey and two storey rear extension.
- 6.3 Following 24/2373/PS192, the Applicant is now applying to connect the two extensions together and make them more functional for the dwelling as well as to properly utilise the potential internal space.
- 6.4 As noted, the subject application is to also include features on the existing plans from 24/1049/HOT and 24/1134/HOT including the alterations to the roof dormers and associated loft conversion which commenced construction on 25/11/24.
- 6.5 Additionally, the alterations to the existing roof lights from 24/1143/HOT have been included as part of this application which is demonstrated on the existing plans.
- 6.6 Furthermore, this application follows the refusal of 24/0200/HOT which consisted of alterations to the principal elevation including windows as well as a rear extension and first floor front and side extension which was subsequently refused on the 18th of March 2024 on grounds relating to design, neighbouring amenity and the potential loss of trees.
- 6.7 The Officer highlighted that the previously proposed development would create a sense of enclosure for the neighbour at number 30 given the wall would have

protruded a total of 4.6m which exceeds the figure set out in the extension SPD. This has since been addressed with the flank wall in question now only extending a total of 3m, in line with the approved application 24/2373/PS192.

- 6.8 Furthermore, it was highlighted that the first-floor extension will have no adverse impact on either neighbour due to its staggered nature. This has been retained as part of the subject application and in any case approved under application 24/2372/PS19; hence the impact of this revised development is considered to be the same in that respect.
- 6.9 The Officer also raised issues in relation to the design of the previously proposed development with the extension being too tall and contrary to the SPD. This has since been resolved with the proposed eaves now matching the existing dwelling.
- 6.10 It was also suggested that the first-floor rear extension was more than half the width of the original house which contradicts the SPD. This is now no longer the case with the proposal measuring at 3m wide on the eastern elevation and 4.5m wide on the western elevation against a total dwelling width of 9.2m.
- 6.11 Lastly, the Officer raised concern with the impact on nearby trees as well as potential flood risk. As part of this application, further information accompanies this application in relation to flood risk and the potential impact on trees, ultimately concluding that there will be no harm.
- 6.12 Similarly, the proposal that is the subject of this planning statement includes many of the same features from the previous approval that has since been implemented, hence it would be unreasonable to object to those elements that have already received planning permission. This will be further explained in the section below labelled Design, Character and Appearance.
- 6.13 As per Policy LP1, the Council require all development to be of high architectural and urban design quality and that each development should demonstrate a thorough understanding of the Site and how it relates to its existing context and take opportunities to improve the quality and character of the buildings, spaces and local areas.
- 6.14 This is justified by 6 criteria which are used when assessing a proposal. The development must be compatible with local character, be sustainable in design and construction, make the best use of land, be appropriately spaced out, consist of inclusive design and must have compatible uses. These are set out below:

1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
2. sustainable design and construction, including adaptability, subject to aesthetic considerations;
3. layout, siting and access, including making best use of land;
4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
6. suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site.

6.15 It is considered that the proposed development and use is consistent with the local character of the area as well as the existing uses whereby the street is predominantly residential, many of which have previously approved extensions and alterations to their respective dwellings. This adheres to criterion 1 and 6.

6.16 Additionally, the proposed development has been designed to make the most effective use of the available land in the most sustainable manner so as to not harm the aesthetic of the street as well as the spaces between buildings. This is as a result of the extension being situated to the rear and only a rooflight that will be set into the roof slope to the front. This adheres to criterion 2, 3 and 4

6.17 Lastly, the proposed development will not adversely impact natural surveillance as set out in criterion 5 and therefore the design is considered to be of an inclusive nature.

6.18 Overall, it is considered that the proposed development has addressed all of the issues relating to the previous refusal as well as demonstrated that the proposal will not extend materially beyond from what is currently certified to be permitted development.

2. Design, Character and Appearance

6.19 As previously mentioned, the dwelling has been designed to be responsive to the previously refused applications.

- 6.20 In relation to Policy LP1, it states that proposals should be of a high design and architectural quality whilst maintaining the high-quality character and heritage of the Borough.
- 6.21 It is considered that the proposed development is of high-quality design and architecture so as to not detract from the existing dwelling as well as the surrounding area.
- 6.22 As the dwelling currently exists, it is evident that there is a lack of uniformity between the windows in relation to the size, design and sitting. As part of this application, the proposed ground floor rear doors are to be matched in size as are the first-floor windows.
- 6.23 It is also considered that the proposed rear windows and doors offer an improved contribution to the character of the area and in particular the appearance of the host dwelling by comparison to the appearance of the existing rear elevation.
- 6.24 The siting and depth of the staggered ground floor rear extension is considered to be compatible with the existing townscape (see application 24/0768/HOT) as well as be of an appropriate scale in relation to the existing dwelling, including considering the only incremental differences to the rear elevation between approved application 24/2327/PS192 and this proposal.
- 6.25 Furthermore, the proposed development will be making the most effective use of the land available in order to make better use of the existing dwelling. As a result of the proposed development, the master bedroom, en suite, dining room and kitchen are all intended to become larger in size.
- 6.26 In terms of the materials that are proposed to be used at the subject site, they are in keeping with the surrounding area as well as being matched to the existing dwelling. This will include white render on both the front and rear of the dwelling which is matched to the existing. Additionally, the proposed clay tiles have been matched to the existing roof.
- 6.27 Lastly, the proposed rear window and doors are all modern versions of heritage styles provided by Crittall, replacing the largely mismatches white UPVC windows.
- 6.28 The additional proposed first floor front roof light is a 'conservation rooflights' so as to not impact upon the nearby heritage assets. Also, given the nature of a roof light, there will be no adverse impact on privacy of neighbouring dwellings.

- 6.29 Furthermore, the roof lights ensure the common sloping roof, that is evident along Park Road, remains intact and does not detract from the character in which it creates.
- 6.30 The importance of appropriate design is echoed by Policy 28 of the Richmond Publication Version Local Plan (regulation 19 version). This states that proposals should take forward the ideas presented in Policy LP1 into broader strategic policy.
- 6.31 The policy focuses on the idea of protecting what is special and improving the LPA's areas. It is considered that based on what has been outlined above, the proposed development will adhere to both Policy LP1 of the current local plan as well as Policy 28 of the draft local plan.
- 6.32 The London Plan also provides a number of policies highlighting the importance of design across the London Boroughs, specifically Policy D4 which states all proposals should be subject to a level of design scrutiny appropriate to the scale of the development.
- 6.33 Furthermore, it states that residential developments should pay close attention to proposed built form, scale, massing, external and internal spaces and ongoing management.
- 6.34 The proposed development is designed to consider the above which will be retained throughout the development process to ensure the design quality is not adversely affected.
- 6.35 Lastly, the proposed development will adhere to paragraph 131 of the NPPF whereby it states development should create 'high quality, beautiful and sustainable buildings and places' which is 'fundamental to what the planning and development process should achieve'.
- 6.36 The proposed development will function well and add to the overall quality of the area, is visually attractive, optimises the potential of the Site and creates a place that is safe, inclusive and accessible.
- 6.37 Overall, it is considered that the proposed development has been designed so as to adhere to the above policies relevant to the Site and will not adversely harm the character or appearance of the dwelling itself and the wider area.

3. Impact on Heritage Assets

- 6.38 As highlighted above, the subject site is within 25m of a listed building, Bute Lodge, that resides directly opposite Park Road. As per Policy LP1, all proposals must seek to maintain and enhance high architectural and urban design qualities which contribute to the character and heritage of the area.
- 6.39 Furthermore, Policy LP8 of the Richmond Upon Thames Local Plan states that all development will be required to protect the amenity and living conditions for occupants of new, existing, joining and neighbouring properties.
- 6.40 It further highlights that the development should ensure that proposals are not visually intrusive or have an overbearing impact as a result of height, massing or sitting. Additionally, that the proposal should ensure that there is not harm to the reasonable enjoyment of the use of buildings.
- 6.41 For context, it is important to understand the features of the listed building before highlighting any potential impacts the development may have.
- 6.42 The list entry makes clear that the heritage asset is an early 19th century distinguished stuccoed villa of 2 and 3 storeys. It has wide eaves to a slated roof with a higher, gabled centre and pilastered bow to the ground floor.
- 6.43 It has a roofed verandah over and round-arc'd window in the gable. Furthermore, it boasts Modelled wings of one window wide with secondary wings in same style. Lastly it has good iron window guards and a modern extension to rear.
- 6.44 Given the nature of the main part of the proposal being situated to the rear of the dwelling, it is considered that there will be no impact on the listed building since there will be no intervisibility between the two.
- 6.45 In conclusion, the proposed conservation roof lights are designed to have a minimal effect on heritage assets, and it is for that reason why they have been included as part of this application.
- 6.46 As previously mentioned, the rear doors and windows are to be Crittall doors which are designed to be sensitive to heritage assets in order to ensure the value of the listed building is not detracted from.
- 6.47 In a similar nature, the proposed front rooflight will also to be 'heritage rooflights'. These are designed to be closer to the roof slope and less visible from Bute Lodge. This in turn adheres to paragraph 205 of the Framework.

4. Flood Risk

- 6.48 Given where the Site is situated, it is important to abide by Policy LP21 of the RLP and Policy 8 of the Richmond Publication Version Local Plan (regulation 19 version).
- 6.49 Policy LP21 of the adopted local plan states that all developments should avoid contributing to all sources of flooding and that all sites situated in Flood Zone 3, as the subject site is, will require a flood risk assessment.
- 6.50 Please see the accompanying flood risk assessment for further detailed information.

5. Impact on Landscaping

- 6.51 The refusal of the previous householder application highlighted some issues relating to the impact the proposed development may have on the existing soft landscaping in the rear dwelling. As such, a tree report has been provided which shows the correct positioning of the trees as well as their RPAs.
- 6.52 The document that is provided highlights that the proposed extension allows for the existing mature trees to be retained without the requirement for additional tree works.
- 6.53 Please see the accompanying tree report for this application for further detailed information. This demonstrates that the proposal is in line with Policy LP16 of the RLP.

6. Amenity of Future Occupiers and Neighbours

- 6.54 Policy LP8 of RLP states that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.
- 6.55 This is achieved by ensuring the design and layout of buildings enables good standards of daylight and sunlight, that proposals are not visually intrusive or overbearing and there is no harm on the reasonable enjoyment of the use of the buildings, gardens and other spaces.
- 6.56 Taking into consideration the previously refused application and that the proposed development is of a lesser scale, it is considered that there will be no adverse harm on the neighbouring dwellings.

- 6.57 The proposed wall closest to number 30, which was approved as part of 24/2373, has been decreased in depth meaning there will be no overbearing impact upon the neighbouring residents. Also, it was concluded that the proposed development would not materially decrease the amount of daylight for the neighbour at 34 as a result of a completed 45-degree test. This has also been shown on the proposed drawings.
- 6.58 In terms of future occupiers, the creation of additional space at the dwelling will result in a positive impact and not result in any material harm.
- 6.59 Overall, it is considered that the proposed extension will not adversely impact the existing neighbours and will provide for an improved standard of accommodation for the current residents.

7 Conclusions

- 7.1 The proposed development demonstrates that the Applicants have fully addressed the previous issues that were raised as part of the original refusal and this statement together with the subsequent reports demonstrate that the proposal will not result in any adverse impacts.
- 7.2 Furthermore, given what has been previously approved via an LDC, but it is not considered that the proposed development will create any material additional harm by comparison to what could lawfully be implemented. It also adheres to the relevant policies relating to design, living conditions and the protection of heritage assets.
- 7.3 In consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority, and it is respectfully requested that this submission is approved.