



TOWN & COUNTRY PLANNING CONSULTANTS

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

BS/JL/462

**BY E-MAIL**

14 January 2025

Dear Sir or Madam.

**RE: 15 LARKFIELD ROAD, RICHMOND, TW9 2PG  
HOT APPLICATION: FORMATION OF NEW HARDSTANDING IN THE FRONT  
GARDEN & NEW DROPPED KERB  
COVERING LETTER: SUPPORTING PLANNING & HERITAGE INFORMATION**

This Covering letter – Supporting Planning and Heritage Information, has been prepared by JLA Ltd (“Agent”) in support of a Householder Planning Application (“Application”) for a residential development submitted on behalf of Dr Pamela Rabbitts (“Applicant”), with regard to No. 15 Larkfield Road, Richmond, TW9 2PG (“Site”).

This Application seeks permission from the London Borough of Richmond upon Thames (“Council”) for the: *“Creation of a vehicular crossover with associated boundary treatment works and landscaping. Installation of electric vehicle charging point.”*

This Application follows the refusal of similar application (Reference Number 23/3071/HOT) that was refused permission on 30 August 2024. The Applicant has reviewed the Council’s Decision Notice and amended / supplemented the scheme accordingly.

The contents of this letter are as follows:

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This letter should be read in conjunction with the following documents (in no particular order):

- Completed Application Forms including CIL Questions prepared by JLA Ltd
- Transport Technical Note (Rev B) prepared by Kronen
- Drawings prepared by 4D Design comprising:
  - o 2426 PL03A ELEV
  - o 2426 PL01 ex plan
  - o 2426 PL02C PRO plan
  - o Site Location Plan

The following documents (submitted with the previously refused application) are relevant:

- 3852412 - Fire Safety Strategy
- 3880526 - Planning Report
- 3880542 - Decision Notice

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

An application Fee of £258.00 will be paid by the Applicant.

## 1. BACKGROUND & OBJECTIVES

The Applicant is the freeholder of the Site and wishes to improve the existing car parking arrangement and boundary treatment and provide an EV charging point.

## 2. SITE DETAILS

### Description of the Site & Its Surroundings

The Site comprises a three-storey, semi-detached dwellinghouse located on the eastern side of Larkfield Road. The building is not identified as a Building of Townscape Merit ("BTM"). However, the Site falls within the Central Richmond Conservation Area (CA17).

Google Map (May 2022): Photograph along Larkfield Road including Site



Google Map (May 2022): Photograph along Larkfield Road including Site



Other relevant Site designations include the following:

Area Susceptible To Groundwater Flood - Environment Agency	Superficial Deposits Flooding - >= 75% - SSA Pool ID: 146
Article 4 Direction Basements	Article 4 Direction - Basements / Ref: ART4/BASEMENTS / Effective from: 18/04/2018
Community Infrastructure Levy Band	Higher
Critical Drainage Area - Environment Agency	Richmond Town Centre and Mortlake [Richmond] / Ref: Group8_004 /
Increased Potential Elevated Groundwater	GLA Drain London
Main Centre Buffer Zone	Richmond Town Centre Boundary Buffer Zone - A residential development or a mixed use scheme within this 400 metre buffer area identified within the Plan does not have to apply the Sequential Test (for Flood Risk) as set out in Local Plan policy LP21.
Risk of Flooding from Surface Water 1 in 1000 chance - Environment Agency	RoFSW Extent 1 In 1000 year chance - SSA Pool ID: 27150
Risk of Flooding from Surface Water 1 in 1000 chance - Environment Agency	RoFSW Extent 1 In 1000 year chance - SSA Pool ID: 27189
Surface Water Flooding (Area Less Susceptible to) - Environment Agency	
Take Away Management Zone	Take Away Management Zone
Throughflow Catchment	Adopted: October 2020 , Contact: Local Plan Team
Area (Throughflow and Groundwater Policy Zone)	
Village	Richmond and Richmond Hill Village
Village Character Area	Central Richmond - Area 15 & Conservation Area 17 Richmond & Richmond Hill Village Planning Guidance Page 56 CHARAREA06/15/01
Ward	North Richmond Ward

## Relevant Planning History

This Application follows the refusal of similar application (Reference Number 23/3071/HOT) that was refused permission on 30 August 2024. The Applicant has reviewed the Council's Decision Notice and amended / supplemented the scheme accordingly.

The Council's reasons for refusal was as follows:

*"U0188059 Reason for refusal- Transport By reason of the unacceptable width, siting, layout, and in the absence any detail showing the layout, the dropped kerb and associated hardstanding for car parking is considered to adversely impact on the free flow of traffic in the locality to the detriment of highway and pedestrian safety. The proposal would be contrary to, in particular, Paragraph 111 of the NPPF, Policies LP44 and LP45 of the Local Plan (2018), Policy 48 of the Publication Local Plan (Regulation 19 Version) and the Council's Transport SPD (2020)."*

A planning history search of the Site has been undertaken by making use of the online property search engine on the Council's website. The relevant planning history is as follows:

- 07/0698/HOT Single storey side extension and first floor rear extension. Granted
- 07/3719/HOT Amendment to previously approved scheme ref: 07/0698/HOT for alteration of rear first floor window to a juliette balcony. Granted.

## Area Precedents

No. 17 Larkfield Road



## Nos. 9 and 13 Larkfield Road



### **Main Planning Policies**

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.

#### **NPPF (2023)**

The key chapters applying to the Site are:

- 4. Decision-making
- 9. Promoting sustainable transport
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding, and coastal change
- 15. Conserving and enhancing the natural environment
- 16. Conserving and enhancing the historic environment

#### **London Plan (2021)**

The main policies applying to the Site are:

- D4 Delivering good design
- D12 Fire Safety
- HC1 Heritage conservation and growth
- G6 Biodiversity and access to nature
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T4 Assessing and mitigating transport impacts

## Richmond Local Plan (2018)

The main planning considerations applying to the Site and the associated Local Plan policies are:

Issue	Local Plan Policy
Local Character and Design Quality	LP1,
Impact on Designated Heritage Assets	LP3
Impact on Amenity and Living Conditions	LP8
Impact on Biodiversity	LP15
Impact on Flood Risk and Sustainable Drainage	LP21
Sustainable Travel Choices	LP44
Parking Standards and Servicing	LP45

## Richmond Publication Local Plan (Regulation 19 Version)

The Richmond Publication Version Local Plan (Regulation 19 version) was published on 9 June 2023 for public consultation which ended on 24 July 2023.

The Publication Version Local Plan, together with all the representations received during the representation period, the plan and its supporting documents were submitted to the Secretary of State for examination on 19 January 2024. The submission documents do not form part of the statutory development plan for the Borough, however, by publishing and submitting the Borough Local Plan for independent examination the Council has formally confirmed its intention to adopt the Publication Plan. The Publication Version Local Plan, including its evidence base, are material considerations for decision making. 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.

As the Council considers the emerging Borough Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations significant weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Therefore, the weight afforded to each policy at this stage will differ depending on the level and type of representation to that policy. This is addressed in more detail in the assessment below where it is relevant to the application.

Note that it was agreed by Full Council on 27 April, when the Publication Plan was approved, that no weight will be given to Policy 4 in relation to the increased carbon offset rate, and therefore the existing rate of £95 will continue to be used; in addition, no weight will be given to Policy 39 in relation to the 20% biodiversity net gain requirement; all other aspects and requirements of these policies will apply.

Issue	Publication Local Plan Policy
Flood risk and sustainable drainage	8
Local character and design quality	28
Designated heritage assets	29
Biodiversity and Geodiversity	39
Amenity and living conditions	46
Sustainable travel choices, Vehicular Parking, Cycle Parking, Servicing and Construction Logistics Management	47, 48

### Supplementary Planning Documents

- Transport
- Village Plan – Richmond and Richmond Hill

### Other Local Strategies

- Central Richmond Conservation Area Statement
- Central Richmond Conservation Area Study

### Determining applications in a Conservation Area

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.

To give effect to that duty, decisions of the court have confirmed that for development proposed to be carried out in a conservation area, a decision-maker should accord "considerable importance and weight" to the desirability of preserving or enhancing the character or appearance of the conservation area, when weighing this factor in the balance with other material considerations which have not been given this special statutory status. This creates a strong presumption against granting planning permission where harm to the character or appearance of a conservation area is identified. The presumption can be rebutted by material considerations powerful enough to do so.

In applications where the decision-maker is satisfied that there will be no harm to the character or appearance of a conservation area, the statutory presumption against granting planning permission described above falls away. In such cases the development should be permitted or refused in accordance with the policies of the development plan and other material considerations.

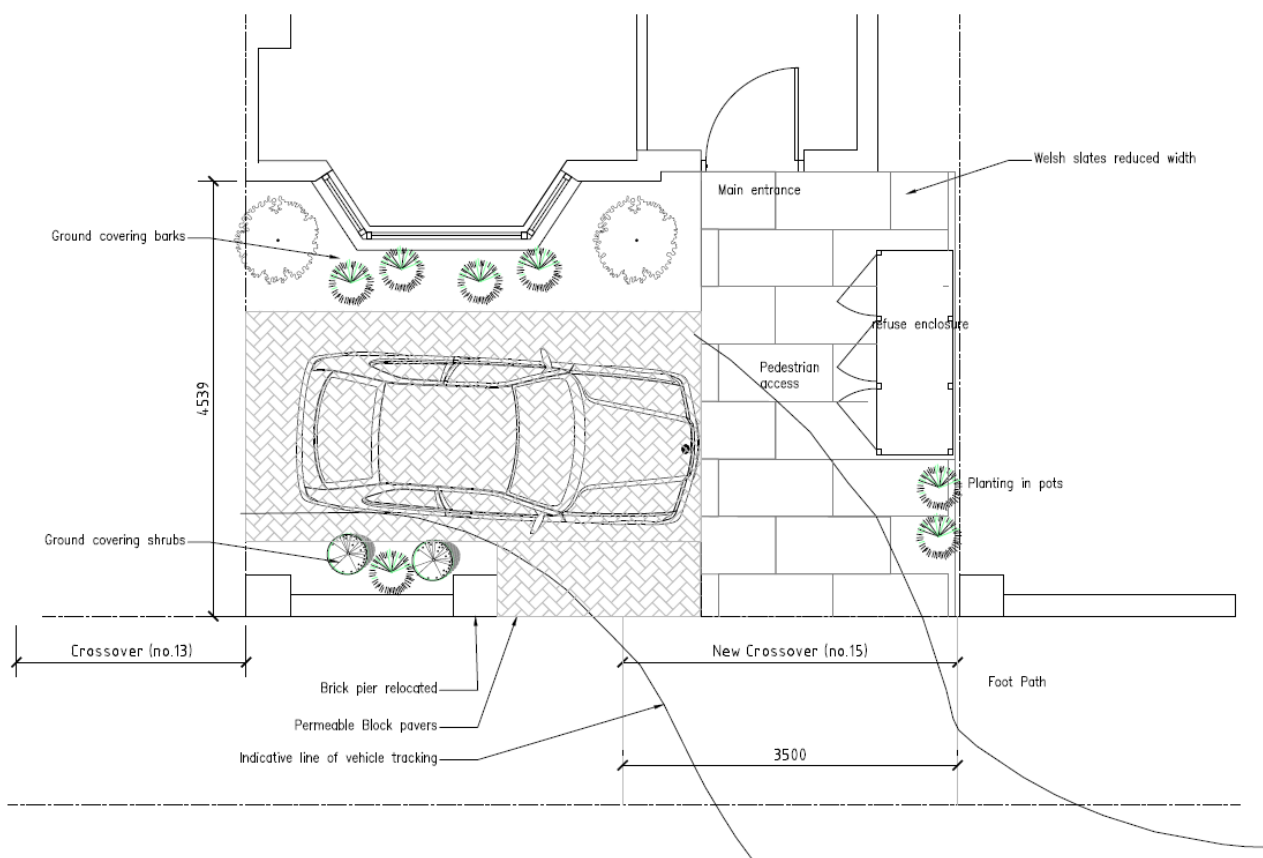
### 3. PROPOSED DEVELOPMENT

#### Description of the Proposal

This application is for the removal of part of the boundary treatment, formation of new hardstanding in the front garden, installation of an EV charging point, creation of vehicular access and new dropped kerb.

Whilst Larkfield Road is not a Classified Road, planning permission is required for the proposal as the Site is located within a Conservation Area.

2426 PL02C PRO plan



#### 4. PLANNING CONSIDERATIONS

The key issues for consideration are:

- Design and impact on heritage assets
- Impact on neighbour amenity
- Transport
- Flood risk
- Fire safety



## Design & Impact on Heritage Assets

### Policy Context

Policy LP1 of the Local Plan 2018 seeks to maintain and, where possible, enhance the high architectural and urban design quality which contributes to the character and heritage of the area. Proposals should demonstrate an understanding of the site and its context when considering the design including layout, siting and access and the compatibility of the works to the neighbouring uses.

LP3 of the Local Plan 2018 seeks to ensure that all development preserves and where possible, enhances the character, appearance and setting of designated heritage assets which includes Conservation Areas.

### Significance of this part of the Conservation Area

The Central Richmond Conservation Area lies to the south east of Richmond Green, centred on George Street and the Quadrant. It adjoins a number of other surrounding conservation areas.

The Central Richmond Conservation Area Statement notes that: *"Church Terrace and Parkshot contain important groups of early 18th century brick terraced houses providing a record of the scale and quality of detail previously seen throughout the area. The conservation area extends to the north beyond the Railway Station to include the Victorian townhouses in Larkfield Road and St. Johns Road which remain in residential use."*

Some of the problems and pressures within the Central Richmond Conservation Area Statement include

- Development pressure which may harm the balance of views, skylines, and landmarks
- Loss of traditional architectural features and materials due to unsympathetic alterations
- Lack of coordination and poor quality of street furniture and flooring
- Domination of traffic and poor pedestrian safety leading to clutter of signage and street furniture
- Loss of original or quality shopfronts and unsympathetic alterations and advertisement Opportunity for Enhancement
- Improvement and protection of its setting
- Preservation, enhancement and reinstatement of architectural quality and unity
- Coordination of colour and design and improvement in quality of street furniture and flooring
- Improvement of highways conditions and pedestrian convenience, and rationalisation of existing signage and street furniture – build on success of projects such as Lower George Street
- Retain and improve the quality of shopfronts and advertisement
- Areas identified for environmental improvement include: Railway station forecourt, The Quadrant and George Street

Opportunities are also identified:

- Improvement and protection of its setting
- Preservation, enhancement and reinstatement of architectural quality and unity
- Coordination of colour and design and improvement in quality of street furniture and flooring
- Improvement of highways conditions and pedestrian convenience, and rationalisation of existing signage and street furniture – build on success of projects such as Lower George Street.
- Retain and improve the quality of shopfronts and advertisement
- Areas identified for environmental improvement include: Railway station forecourt, The Quadrant and George Street

It is useful to note that unlike most Conservation Area Statements and appraisals in the borough, one pressure not identified is the loss of front gardens, which is a recognition that in some way that the character has already changed.

Paragraph 4.8 of the Councils Transport SPD states that where an opening has to be made in an existing wall, railing, or fence, it should be kept to a minimum and made good at both ends to match existing materials and details, such as timber posts and piers. It will be expected that as a minimum two-thirds of the boundary wall/fence will be retained or re-provided to ensure a continued sense of enclosure. Where possible, gates should be provided and visibility splays to the footway will be a requirement.

Paragraph 4.9 of the Councils Transport SPD states: *"that footway crossovers if approved will be provided to the design standards set out in the Public Space Design Guide, which gives guidance in streetscape design. Further, 'It should be noted that existing crossovers do not set a precedent for new crossovers in a street and will not be accepted as an argument for the provision of other crossovers which do not meet current adopted policy."*

## **Assessment**

The proposal comprises a parking space which would be approximately 4.8m in length and 2.4m in width, and would feature permeable paved hard surfacing (varied). The proposal would create a shared / common dropped kerb for 15 and 17 Larkfield Road (approximately 7.1m). The proposed works would also result in the removal of the existing pedestrian entranceway and shortening of the section of railings to facilitate car parking. It is acknowledged by the Council in the previous application that it is a common feature along this section of Larkfield Road. Of note, part of the front boundary would remain and would ensure that an element of the boundary treatment and its contribution to the streetscape is retained.

In terms of front boundary treatments along Larkfield Road, there is no overriding consistency. As set out above, some properties have low brick walls with taller piers, timber and picket style fencing and railings. Dropped kerbs are also a common feature of Larkfield Road and therefore the impact will be fairly neutral to the appearance of the local area

The proposed boundary treatment would not appear out of keeping with the street scene in this regard. The proposed hardstanding would replace the existing and has been acknowledged by the Council, with the previous application, that these works may be carried out under Permitted Development rights.

No objections was raised by the Council regarding the EV charging point. The provision of an EV charging point has been accepted as a material planning benefit in recent appeal decisions in the borough, notable 1 Bolton Gardens, Teddington (Ref. APP/L5810/D/22/3298375) and 42 & 44 Rosemont road, Richmond (Ref. APP/L5810/D/22/3303027)

The works to facilitate car parking on the front garden at No.15 are considered, on balance, to have a neutral impact on the character and appearance of the conservation area although no different to the mix of front boundary treatments, front garden treatments, and prevalence of cars parking on front gardens along Larkfield Road.

Paragraph 205 of the NPPF states 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether

Paragraph 208 of the NPPF states: "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal'. In this instance, the proposal is not considered to result in harm to the character and appearance of the Conservation Area.*"

In view of the above, the proposal would comply with the aims and objectives of policies LP1 and LP3 of the Local Plan and policies 28 and 29 of the Publication Local Plan as supported by the Central Richmond Conservation Area Statement and Study

## **Impact on Neighbour Amenity**

### **Policy Context**

Policy LP8 states that development must protect the amenity and living conditions of existing, adjoining, and neighbouring occupants. Design must allow for good daylight standards, avoid overlooking or noise disturbance, avoid visual intrusion, overbearing impacts, or harm to the reasonable enjoyment of the uses of buildings and gardens. Harm may arise from various impacts such as noise, air pollution, odours, or vibration.

The Supplementary Planning Document for House Extensions and External Alterations also seeks to protect adjoining properties from visual intrusion, loss of light and privacy.

### **Assessment**

Given the maximum height the proposed boundary treatment it would not appear unduly overbearing, nor cause adverse sunlight issues.

Given the nature of all other works proposed under this scheme (alterations to front garden/driveway and landscaping), these are not considered to result in any material impact on the residential amenity of neighbouring or surrounding dwellings.

The proposed scheme is considered acceptable in terms of neighbour amenity. The proposal is not considered to detrimentally impact the amenities of any neighbouring occupiers and therefore, is in line with policy LP8 of the Local Plan (2018) and relevant Supplementary Planning Documents/Guidance.

## Transport

### Policy Context

Please refer to the supporting Transport Technical Note (Rev B) prepared by Kronen.

Policy LP45 of the Local Plan states 'The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and the local environment, and ensuring making the best use of the land.'

The Council's Transport SPD 2020 (Appendix 2 Para 5.15) states that where neighbours may wish to share a crossover, the width of flat section should be between 2.4m and 4.8m, with the minimum width preferred.

Appendix 2 Para. 5.17 states that footway crossovers grouped together for more than 2 vehicles in a row, will not be permitted on publicly maintained highways. Sightlines from these spaces are diminished and they present a large area of crossover for pedestrians to negotiate, as well as removing on street community parking.

Appendix 2 Para 5.4 states that on non-classified roads, the garden must be able to accommodate a car parked at 90 degrees to the footway and the car-standing area must be a minimum size of 2.4m wide and 4.8 m long, with a further width of at least 2.4m. The parking space should not be sited in front of the main door to the house.

### Site Photograph along Larkfield Road



## Assessment

The reason for refusal sets out that this would be detrimental to the free flow of traffic and this in turn would cause harm to highway and pedestrian safety. We do not consider that harm to the free flow of traffic would result in harm pedestrian safety. It is important to note that the road is one way and limited to 20mph and not a busy thoroughfare. It is set away from the junction with Lower Mortlake Road so any manoeuvre to reverse in or out would not be unduly prejudicial and this movement is relatively commonplace on the highway.

It is also noted that classified roads with speed limits of 20mph or less do not require the garden turning area of 8.0 x 10.0m.

The Applicant's highway consultant has visited the site it was observed that the adjacent roads were quiet and that vehicles were mainly travelling at low speed. There is also clear visibility to both the north and the south. Given the width of the carriageway and its one way direction, together with the proposed clearly defined driveway access, it is unlikely that access manoeuvres could be confused. No turning space would be provided within the Site and vehicles would have to reverse either in or out of the driveway. However, having regard to the above considerations, we consider that such a manoeuvre could be done safely, without prejudicing the free flow of traffic and highway and pedestrian safety.

An appeal decision at 1 Bolton Garden, Teddington, TW11 9AX (PINS Ref APP/L5810/D/22/3298375) noted the Inspector was quite critical about the rigid application of the SPD, which should be applied as guidance only.

*"It appears to me that the Council's objections are based on what appears to me to be a rigid and over-enthusiastic application of dimensional guidelines<sup>2</sup>, in circumstances where the proposal is only marginally below the recommended standards, and where numerous local examples exist of similar development as proposed having taking place without apparent harmful effects. In my view, given a normal level of caution and care when driving, the use of the proposed space is not likely to harm either highway or pedestrian safety."*

In term of the EV charging points (as accepted on previous appeal decisions), as a whole, the proposal would also allow the benefit of EV points in an area which has a poor PTAL rating which I consider is in favour of the proposal in this case in contributing towards sustainable development and travel.

The proposal would not have a harmful effect on highway safety and would not conflict with Policy LP 45, or the advice contained within the NPPF, which states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety. Whilst the proposal would not comply with all of the general advice set out in the SPD, the purpose of this document is for guidance, and it does not form part of the statutory development plan."

## Flood Risk

### Policy Context

Policy LP21 of the Local Plan states 'All developments should avoid or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater, and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.

### Assessment

The Site is located within an area susceptible to groundwater flooding, a critical drainage area and a throughflow catchment area. No changes are proposed which will increase the amount of impermeable surface associated with the site. As such, as with the previous application, no objection should be raised to this proposal in regard to flood risk.

## Fire Safety

### Policy Context & Assessment

The Applicant has submitted a 'Reasonable Exception Statement' to address policy D12 of the London Plan (2021).

## 5. CONCLUSIONS

The Applicant is the owner of the Site and requires vehicular access to provide off-street parking to allow the parking and charging of their electric vehicle.

The creation of off-street parking would not be out of character in the streetscape given that the significant majority of properties either side of the Site have off street parking. While some properties display varying boundary treatments to their front gardens, the overriding character of Larkfield Road is not defined by boundary walls.

The removal of one of the on-street parking spaces would improve the aesthetic quality of the streetscape and the pedestrian experience, widening the width of the road for vehicular traffic, service, and emergency vehicles.

The Proposal would not have an adverse impact on the local highway and would not prejudice local highway conditions.

It is therefore respectfully requested that this Applicant be approved.

I trust this letter is satisfactory for 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,



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