



## **DESIGN & ACCESS STATEMENT**

**In conjunction with an application for the conversion and restoration of the Old School building to form 5 no. residential apartments, and 90 square metres of B1a Office space, and the erection of 3no terraced townhouses with basement accommodation at the rear, with car parking, landscaping, and use of the existing vehicular access.**

**The Old School, Park Lane  
Richmond, London, TW9 2RA**

**For Halebourne Land & Planning Ltd  
19<sup>th</sup> August 2014.**

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# 1. INTRODUCTION

1.1 This Statement should be read in connection with a detailed, full planning application, for the conversion and restoration of the Old School building to form 5 no. residential apartments, and 90 square metres of B1a Office space, and the erection of 3no terraced townhouses with basement accommodation at the rear, with car parking, landscaping, and use of the existing vehicular access.

1.2 The application site lies within the boundary of Richmond Town Centre and is shown edged in red on the submitted site location plan. The site contains an ex Victorian school building with an attached schoolmasters' house, car parking to the rear and an existing vehicular access to the side off Park Lane.

1.3 The main school building is not on the statutory lists but has been designated as a local Building of Townscape Merit by the local planning authority. That designation is attached as part of the submitted application papers. It should be noted that the application site does not fall within the area covered by a recent Article 4 Direction covering parts of Richmond Town Centre which has been served by the local planning authority and dealing with permitted development rights to change the use of B1a offices to C3 dwelling units.

1.4 The school was built in the mid 19<sup>th</sup> century and is current used by Richmond Film Services for a range of business uses based upon a B8 Storage and Distribution use, with ancillary offices. The use is subject to a personal planning condition limiting the activities to those carried out by Richmond Film Services. The site lies within the Richmond Town Centre Conservation Area and also within an Archaeological Priority Area.

1.5 The main school building and school master's house are in a very poor structural and decorative condition, and are deteriorating rapidly. These latest proposals are intended to ensure that this building can be retained for the long term and is revitalised and made much more sustainable in design and energy and water efficiency terms, without losing any of its essential character or local heritage value.

1.6 This proposal follows on from previous planning, and Conservation Area Consent applications (references 12/2968/FUL and 12/2969/CAC) which were made in 2012 by Renworth Homes (Southern) Ltd. The site is now under option with the owner to a new development company Halebourne Land & Planning Ltd, although the team that dealt with those previous applications is still in place and is responsible for this latest application being made on behalf of the developer.

1.7 It should be noted that since those last applications were submitted, it is now possible to co – join planning applications and applications for Conservation Area Consent, so that these latest proposals are now the subject of only one comprehensive planning application.



1.8 A set of Community Infrastructure Levy (CIL) charge application forms are also submitted covering both the Mayoral CIL Crossrail Charge which is already in place, and the proposed Borough wide CIL Charge which comes into effect from November 2014 onwards.

1.9 The site has already been the subject of pre - application consultations with the Council, in 2011. We have once again, taken account of the views expressed by officers at that meeting, which was held with Knight Frank and Upchurch Associates and the current owner.

1.10 In addition there were a number of meetings held with officers during the course of the last set of applications, and separate meetings held with the ward Councillor, and local residents who live in Parkshot to the immediate east of the site, and also in The Gateway flatted complex to the immediate west. The outcomes of those meetings have fed into the alterations made to the scheme which now form part of this latest revised application.

1.11 The main changes now proposed from the previous applications include:

- Significant design changes made to substantially reduce the height and scale of the three townhouse units at the rear of the site and to alter their appearance, built form and detailed design;
- The retention of three existing main facades of the existing Old School building and school master's house (which are a 'locally listed' Building of Townscape Merit), instead of the previous proposal to carefully dismantle the whole building and use as much salvaged material as possible;
- The retention of 90 square metres of B1a Office floor space within the existing (retained) school master's house and part of the Old School building, which will be able to accommodate up to 10 employees, thus resulting in a mixed use scheme **with no loss of nos of employees on the site**. The previous proposal involved a fully residential scheme of 9no units and retained no employment floorspace;
- A more comprehensive set of viability assessments which review the viability of a wider range of alternative uses/scenarios for the site and the existing building;
- Updated and new independent valuations for a range of alternative land uses from Levy LLP;
- A new Heritage Statement which focuses on the revised method for retaining the existing main facades of the building on site and what benefits this will result in for the Building of Townscape Merit;
- A second independent structural appraisal report which reviews the latest current condition of the main building and which supports David Carr's original report and conclusions. It also proposes a method for the retention of the three main facades of the Building of Townscape Merit. The writer also considers the option of a full conversion of the existing building for the development in a separate letter;
- A revised and updated Sustainability and Energy Strategy Statement as well as a new Sustainable Construction Checklist – this scheme will result in substantial sustainability improvements;

- Correspondence from an independent highway engineer dealing with the use of the existing vehicular access and revised car parking proposals – the revised scheme does not now involve the loss and replacement of one on street residents parking bay, all car parking for the development can be accommodated on site;
- The payment of a major contribution for off – site affordable housing provision elsewhere in the Borough through a Section 106 Unilateral Undertaking.
- The payment of a new CIL Charge based upon a charge of £250 per square metre of new build residential floor space, and the Mayoral CIL Crossrail Charge.

1.12 This latest revised application is therefore by its nature very complex, and has involved the commissioning of a number of new or updated supporting documents, the purpose of which will be made clear from a reading of this, and the associated Planning Statement.

## 2. PLANNING HISTORY

2.1 The planning records for this site show that The Old School was designated for residential use from the early 1970's up to the 1990's, including within the Greater London (GLC) Development Plan. Furthermore, planning permission was refused in 1973 for replacement offices on the basis that there was an oversupply of B1 offices in the Borough and in Richmond.

2.2 It should also be noted that whilst the previous residential designation was in place between the 1970's and 1990's the Council also refused planning permission in 1980 under ref 80/865 for open ended and speculative B8 Storage uses on the basis that this was not in accord with the residential designation and would have harmed the amenities of residents in the surrounding properties.

2.3 Permission was only granted previously in 1970 for storage purposes under permission 70/252 **for a limited range of uses** including as a catering school, catering reception rooms, kitchen and the warehousing of equipment **for a 10 year period only**. That limited period condition was imposed in order not to compromise a future residential use of the site and to protect residential amenity of the residents living on both sides of the site.

2.4 Of course that temporary planning permission then lapsed, and the subsequent application made in 1980 under 80/865 was refused anyway, as advised above.

2.5 Furthermore, the only reason that a subsequent planning application, 85/1772, was then approved for a B8 storage and Distribution use was that it was a very atypical storage use and was geared to providing a specific service to the British broadcasting and film industry. In fact that permission was **both made personal to Richmond Film Services, and limited to the use of the site to support the British Film and Broadcasting Industry**. There were no other conditions imposed.

2.6 In that context the fact that the planning permission that the current occupier relies on does not run with the land but is personal to him **is a significant material planning factor here that must be taken into account in any assessment of these latest proposals.**

2.7 It should also be noted and is of significance in this case, that should the current owner and land use vacate these premises, then the site would fall back, in law, to a D1 Educational use, with a residential dwelling attached, ie as a school and school master's house, being the previous lawful use before the building was brought into use by Richmond Film Services.

2.8 In the above context it can reasonably be concluded that the site is not a typical employment site, but one which:

- Was an ex Victorian school with a substantial residential component;
- Had a residential designation in the Borough's and GLA development plans in the not too distant past;
- Had only a temporary planning permission for a very specific range of uses which has long ago lapsed, and then;
- Has only a current planning permission made personal to the current owner for a very specific use, which was imposed in recognition of the proximity of other nearby residential properties and the potential harm that would result to their amenities from an unfettered employment/commercial use of the site, and in particular the rear yard and access.

2.9 As referred to above in paragraph 1.4 of this Statement two previous planning, and Conservation Area Consent applications (references 12/2968/FUL and 12/2969/CAC) were made in 2012, but refused planning permission in May 2013. Those decisions have informed the many changes made to the scheme from the previous proposals.

### **3. THE APPLICATION SITE AND ITS SURROUNDINGS**

3.1 The application site sits in Park Lane, which is a mainly residential road within the town centre, with resident parking bays and controls on the street on both sides. The site is within very easy walking distance of the main town centre services, railway and London Underground station, bus services, and a huge range of retail outlets, as well as nearby open spaces and parks. It does not lie within a flood plain, and contains a rear car park serving Richmond Film Services' operations which can accommodate up to 14 vehicles. The car park, from time to time, has to accommodate HGV's and large vans which have to reverse down the existing access drive from Park Lane to offload or pick up goods.

3.2 The residential developments on each side of the site on Park Lane are of a greater scale and bulk than the existing main school building, and to the rear major extensions are

underway to add a large extension to The Magistrates Court and College complex fronting Parkshot, but which lie to the immediate rear of the site.

3.3 The side and rear boundaries of the site are walled, and at the rear there is a multi stemmed tree, which is putting significant pressure on the wall along the rear boundary. It is, again, proposed to be removed as part of this revised scheme, but would be replaced by another good quality tree within the site, and away from the rear wall. Another mature tree sits on the south eastern boundary and is overhanging that boundary and the site. However it is to be retained, but with some essential crown raising and pruning back proposed.

3.4 The frontage is marked by the original wrought iron railings and soft landscaping. There is a pedestrian path and gate at one end.

## **4. PLANNING POLICY FRAMEWORK**

4.1 These latest revised proposals should be assessed against a raft of national and local planning policy guidance, as well as the advice and guidance contained in the Town & Country Planning Act 1990 at section 70(2) and in the Town & Country Planning Compulsory Purchase Act 2004 at section 38(6) wherein it is stated that applications should be determined in accordance with a development plan so far as it is relevant and material, unless other material circumstances indicate otherwise. This overarching guidance is supplemented by more detailed guidance in the National Planning Policy Framework (NPPF), March 2012 and in the development plan for the Royal Borough of Richmond upon Thames. The Borough's development plan (Local Development Framework) is made up of the following policy documents:

- The adopted April 2009 Core Strategy DPD ;
- The adopted November 2011 Development Management DPD;
- Emerging Site Allocations DPD;

4.2 It should be noted that the previous 2005 adopted and 'saved' Unitary Development Plan (UDP) has now been superseded by the Core Strategy and Development Management DPD should be given very little weight now. I consider however that the NPPF should be given significant weight in any assessment of this latest application, and in particular paragraphs 14, 17, 22, 47, 51, 128, 131, 132, 134, and 212 – 216 in Annex 1.

4.3 In addition the government's on line Planning Practice Guidance Notes which address a whole range of planning, viability, economic development, affordable housing and other related guidance are also an important material consideration. 'Planning for Growth', March 2011 is also relevant here, as are the RICS published guidelines on carrying out viability assessments, dated August 2012.

4.4 The local planning authority has also published a number of draft or adopted Supplementary Planning Documents (SPD) dealing with:

- Sustainable Construction Checklist;
- Affordable Housing;
- Design Quality;
- Front garden and other off – street car parking standards;
- Residential development standards;
- Consultation draft dealing with Buildings of Townscape Merit;
- CIL Charging Schedule;
- Section 106 Planning Obligations and Contributions.

4.5 These are all, to one degree or another relevant to these revised proposals, and will be dealt with later where necessary. The Central Richmond Conservation Area Study is also relevant, as is the study of Employment Sites and Premises in the Borough, carried out by Peter Brett Associates for the local planning authority in 2013.

4.6 The Council also publishes an annual Strategic Housing Land Availability Assessment (SHLAA) and the results of this review of housing land supply in the Borough are fed into the Annual Monitoring Statements' housing land supply trajectories, and identified housing site allocations in the Site Allocations DPD. The need for more market housing, as well as the provision of affordable housing in whatever form, is a key objective of the NPPF and the development plan.

4.7 The Consolidated 2013 London Plan, with Further Alterations proposed in 2014, which includes greater housing targets for all London Boroughs are also relevant.

## 5. LAND USE

5.1 The principle of the proposed form and mix of land uses needs to be assessed against Policy CP1 of the Core Strategy and Policy DM HO3 of the Development Management DPD. The Council acknowledged during the course of the previous applications in 2012 that setting aside the loss of employment, the proposal for further residential uses here would be acceptable. In this case **such a view is reinforced with the inclusion of employment floor space within the revised proposals.**

5.2 It should be noted that a predominantly residential led scheme is entirely appropriate here in relation to the adjacent land uses, which are residential to both sides, with a Magistrates Court and Educational College complex to the rear. The site's location within Richmond Town Centre is also well suited to a residential led scheme, being supportive and underpinning of one of the Council's key objectives in the Core Strategy of supporting the viability and vitality of the town centre, as well as being supported by the London Plan and the NPPF's guidance in respect of encouraging more housing in town centres.

## **6. AMOUNT OF DEVELOPMENT**

6.1 The application is for the refurbishment and re – use of the existing Old School building, including the retention of three of the existing main facades, for the formation of 5no residential apartments and 90 square metres of B1a Office space, and the erection of three terraced townhouses with basement accommodation at the rear, with car parking for 9no vehicles, electric charger points, landscaping including SUD's, and the use of the existing vehicular access. Demolition of minor single storey elements of the school building is also proposed.

6.2 The existing buildings total approx 300 square metres. The proposed use of the retained area of the existing school building and school master's house including the new internal first floors would total 415square metres floorspace (GIA). The retained B1a floorspace would total 90 square metres GIA of that amount.

6.3 The three new residential townhouses at the rear would total approx 310 square metres (GIA) in floorspace, and represent the 'enabling' development for the funding required for the long term repair and restoration of the existing school building and school master's house.

6.4 Policy CP14 of the Core Strategy requires that residential schemes provide a reasonable number of small units appropriate to the site. The Council normally tries to achieve a 25% level of provision of such units. Policy DM HO4 of the Development Management DPD however seeks to provide more small family dwellings. In this case the revised scheme proposes a range of 2no and 3no bedroom units, and this mix is considered to meet the broad objective of Policy DM O4. In relation to Policy CP14, the local planning authority has previously confirmed that this form of mixed provision would complement the range of smaller flats in the area and contribute to the overall variety of units sizes here.

6.5 It is considered that the same view should be taken by the local planning authority with these revised proposals since the mix has not altered significantly, and now includes 90 square metres of B1A office / employment space.

## **7. LAYOUT**

7.1 The layout proposed respects the relationship with the adjacent residential developments and the need to provide a long term and permanent solution for the Building of Townscape Merit on the frontage. The rear yard which is currently used for car and van parking and servicing in association with the current commercial activities, would still be used for parking and turning purposes but would be much more efficiently designed so that a windfall development of three new terraced townhouses could be built along the rear boundary, each with their own front garden area and car parking space.



7.2 The existing vehicular access would be retained and used, and the existing brick boundary walls and frontage wrought iron railings would also be retained. The layout would still enable an emergency vehicle to enter and leave the site, and would also enable some landscaping to be undertaken to enhance the setting for the school building and the three new houses at the rear.

7.3 The three houses at the rear have been reduced in scale and height significantly from those proposed in 2012 and their 'mews' built form is appropriate to the layout and setting created by the retained ex school building and school master's house on the frontage. Each of the new residential units meets the minimum habitable room standards as applied through The London Plan.

## **8. SCALE AND APPEARANCE**

8.1 Policy DM DC1 of the Development Management DPD requires all new developments to be of a high architectural standard and urban design, based upon sustainable design principles. These revised proposals, especially in relation to the three townhouses at the rear, were the subject of informal post application discussions with the local planning authority in early 2013 and this part of the development has been radically altered to take into account the design changes sought by officers.

8.2 The three townhouses have:

- A significantly reduced height, bulk and massing;
- A more traditional approach applied to their design – Victorian in approach and vernacular rather than very contemporary, with large areas of glazing as previously proposed;
- A more consistent approach applied to fenestration generally, and to the roof lights on the rear of the roof – Conservation type roof lights will be used;
- High quality external materials and finishes – London yellow stock bricks and good quality slates, with timber casements for windows and doors ;
- A scale and massing appropriate to a residential mews or back land site.

8.3 It is considered that the scope for changes to the proposed conversion of the main building are far less and unnecessary anyway, although some minor changes in the layout of one or two of the first floor flats have been made to deal with detailed design and layout issues raised by officers last year.

8.4 The scale and height of the retained ex school building and school master's house would remain unchanged through the proposed method of construction, which is now to be based around facade retention as an objective. It is the applicant's aim to ensure that when completed the frontage building would retain the same character and appearance as it does now but within a much more robust and sustainable built form and structure.

8.5 It is considered that overall these design changes are a substantial improvement on the previous proposals and would also enable the local planning officer to conclude that they are, in respect of the three rear townhouses and the retained BTM completely in accord with Policy DM HO3 of the Development Management DPD.

## **9. LANDSCAPING AND TREE REPLACEMENT**

9.1 The application site is in the town centre and in a strongly urban and residential setting. It is considered that the proposed layout will still protect and enhance the setting of the BTM on the frontage of the site, and create a strong linkage in building typology terms between the BTM and the three townhouses proposed at the rear.

9.2 Policy CP4 of the Core Strategy and Policy DC4 and DMOS5 of the Development Management DPD seek to protect existing trees and discourage schemes which would result in a significant loss of wildlife or landscaping. The existing trees on the site have been surveyed by an independent arboricultural specialist, Patrick Stileman, and his recommendations made previously have been accepted by the Council's Tree Officer. The proposed replacement trees and their new planting positions were also agreed and are not proposed to be changed in this latest layout. Patrick's Tree Survey and Condition report forms an integral part of the submission.

9.3 The side and rear boundaries of the site are walled, and at the rear there is a multi stemmed tree, which is putting significant pressure on the wall along the rear boundary. It is, again, proposed to be removed as part of this revised scheme, but would be replaced by another good quality tree within the site, and away from the rear wall. Another mature tree sits on the south eastern boundary and is overhanging that boundary and the site. However it is to be retained, but with some essential crown raising and pruning back proposed.

9.4 The frontage is marked by the original wrought iron railings and soft landscaping. There is a pedestrian path and gate at one end. The trees on the frontage are in poor health and are recommended to be removed and replaced by the applicant's arboricultural advisor, Patrick Stileman. The wrought iron railings can be retained and restored ultimately and continue to be used to define a private frontage area for the BTM and its new uses.

9.5 The proposed layout, although led by the hard landscaping of the paved areas and dividing walls for the individual gardens, will still enable a reasonable level of soft landscaping to be provided, particularly on the frontage and the details of this landscaping can be agreed through a planning condition.

## **10. ACCESS**

10.1 The applicant has submitted a report from an independent highway engineer and consultant which deals with access arrangements and car parking provision. He has concluded that the revised proposals in relation to the use of the existing access, car parking provision, and layout are acceptable and in line with Policy CP5 of the Core Strategy and Policies TP8 and of the Development Management DPD. The scheme has altered from the previously proposed layout so that there would no longer be any impact on the existing level of on - street residents parking bays.

10.2 Each of the residential units would have 1 no car space each, which would include a battery charger for electric cars. The B1a offices would have 1 no car parking space as well, which, given the proximity of the town centre and public transport services to the site and the offered 4-5 no secure cycle storage racks for staff to use, is considered to be an acceptable level of car parking provision in this location and in accord with the LPA's car parking standard for offices. The site is located in an area with a PTAL accessibility score of 6a (highly accessible).

10.3 Secure cycle storage is also proposed for the 8 no dwelling units, on the basis of one rack/space per unit, and the details of this can be agreed through a planning condition. The refuse and recycling bin enclosure is accessible from the street and now meets the required standard and size for refuse collection services.

10.4 It would be possible, if the local planning authority wished to enter into a Section 106 Agreement relating to the provision of a car club on the site for the B1a office users, and the prevention of future occupiers of the residential units from claiming resident parking permits in Park Lane. These matters can be the subject of early discussion in due course in relation to that Section 106 Agreement.

10.5 In relation to inclusive access, the new dwellings at the rear of the site will meet the requirements of the Disability Discrimination Act and be accessible as defined in those terms. In terms of Policy CP14 of the Core Strategy and Lifetime Homes standards, these too can be the subject of discussion, but how far those standards can be met is also related back to viability and what can be afforded.

## **11. ARCHAEOLOGY**

11.1 Thames Valley Archaeology Ltd carried out a desk based heritage assessment of the archaeology potential on and around the site. The study concluded that the excavations required, in order to construct the school and its subsequent extensions, had disturbed the upper levels of the ground beneath the buildings and destroyed any shallower archaeological remains. However deep deposits under the ex playground, and now the rear car park area are less likely to have been disturbed.

11.2 As a result they recommended that a scheme for further evaluation is needed to be able to mitigate the impact of any development on below ground archaeology especially in relation to the three townhouses at the rear. This can be made the subject of a planning condition should planning permission be granted which requires that scheme of mitigation to be approved in writing before any work commences on site.

Chris Watts MRTPI DMS

19<sup>th</sup> August 2014.