



GL Hearn
Part of Capita Real Estate

Planning Statement

Tesco Stores Limited

Tesco Metro
29 George Street
Richmond Upon Thames
TW9 1HY

January 2016

Prepared by

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Quality Standards Control

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This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

DATE
January 2016

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Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 INTRODUCTION

- 1.1 GL Hearn have been instructed by Tesco Stores Limited to submit a planning application, in relation to the 2nd and 3rd floors of their existing trading Metro Store at 29 George Street, Richmond upon Thames for the change of use of these floors from ancillary retail use (2nd floor) to the ground floor retail store and vacant space at 3rd floor, to residential use (C3).
- 1.2 This full planning application seeks permission for the change of use of the 2nd and 3rd floors to form 9 one bedroom flats (C3 use) with external alterations and enclosure of walkway at 1st floor, new residential access, bin store, bicycle storage, replacement of plant, new stairs to roof access and limited internal reconfiguration of food store at ground floor level.
- 1.3 The proposed development would allow the upper floors, which are currently underused at 2nd floor and vacant at 3rd floor level to be utilised in order to provide 9 flats. The offices at 1st floor level are to be retained.
- 1.4 This planning application is being submitted further to planning application 15/2993/FUL which was withdrawn on 01/12/2015.
- 1.5 Application 15/2993/FUL was for the *“Change of use of the 1st, 2nd and 3rd floors from ancillary retail space to from 9 flats (C3 use) with external alterations and enclosure of walkway at 1st floor, new residential access, bin store, bicycle storage, replacement of plant, new stairs to plant access and internal reconfiguration of food store at ground floor level and offices at 1st floor”*.
- 1.6 The key difference between this application and the withdrawn application is that application 15/2993/FUL proposed one x 2 bed flat at 1st floor level and two x 2 bed flats at 2nd floor level alongside 6 x 1 bed flats at 2nd and 3rd floors. The current planning application differs due to the fact that no flats are proposed at 1st floor level and all of the proposed nine flats are 1 bedroom.
- 1.7 This planning application also addresses points raised by the Council and neighbours regarding application 15/2993/FUL. This includes issues relating to overlooking, refuse storage and transport.
- 1.8 Section 2 of this Planning Statement sets out the description of the site, Section 3 outlines the planning history, Section 4 outlines the description of development, Section 5 outlines the relevant policy, Section 6 assesses the planning considerations and Section 7 provides the conclusion.
- 1.9 In addition to this statement, the application is accompanied by the following supporting documentation:
- Planning Application Forms Including Certificates of Ownership
 - Transport Statement prepared by Transport Planning Associates

- Noise Assessment prepared by Sharps Redmore
- Design and Access Statement prepared by ttg Architects
- BREEAM Domestic Refurbishment Pre-Assessment prepared by AECOM
- Energy Statement prepared by AECOM
- A suite of plans prepared by ttg Architects:
 - 3341 001 Rev A Site Location Plan
 - 3341 304 Rev A Site Environment
 - 3341 100 Rev D Proposed Ground Floor
 - 3341 101 Rev D Proposed First Floor
 - 3341 102 Rev G Proposed Second Floor
 - 3341 103 Rev E Proposed Third Floor
 - 3341 110 Rev D Proposed Site Plan
 - 3341 201 Rev E Existing Church Court Elevations
 - 3341 202 Rev C Proposed Church Court Elevations
 - 3341 203 Rev - Entrance and Roof Elevations
 - 3341 300 Rev B Existing Ground Floor Plan
 - 3341 301 Rev A Existing First Floor Plan
 - 3341 302 Rev B Existing Second Floor Plan
 - 3341 303 Rev B Existing Third Floor Plan

2 SITE AND SURROUNDINGS

- 2.1 The application site is located on the South side of George Street, within the key shopping frontage of Richmond Upon Thames Major Town Centre.
- 2.2 The site is located within Central Richmond Conservation area (CA17) and is adjacent to the Grade II listed St Mary Magdalene Church.
- 2.3 The site consists of a building of Townscape Merit which fronts onto George Street and an adjoining two storey brick and stone building to the rear. The building steps back at first floor on the Church Court elevation to create an open means of escape. The area of the building is 1,487 m². The entire site area is 2,786.5m².
- 2.4 The site is bounded by George Street to the North which, by virtue of its Town Centre location, predominately consists of commercial uses at ground floor with office and residential accommodation located on the upper floors.

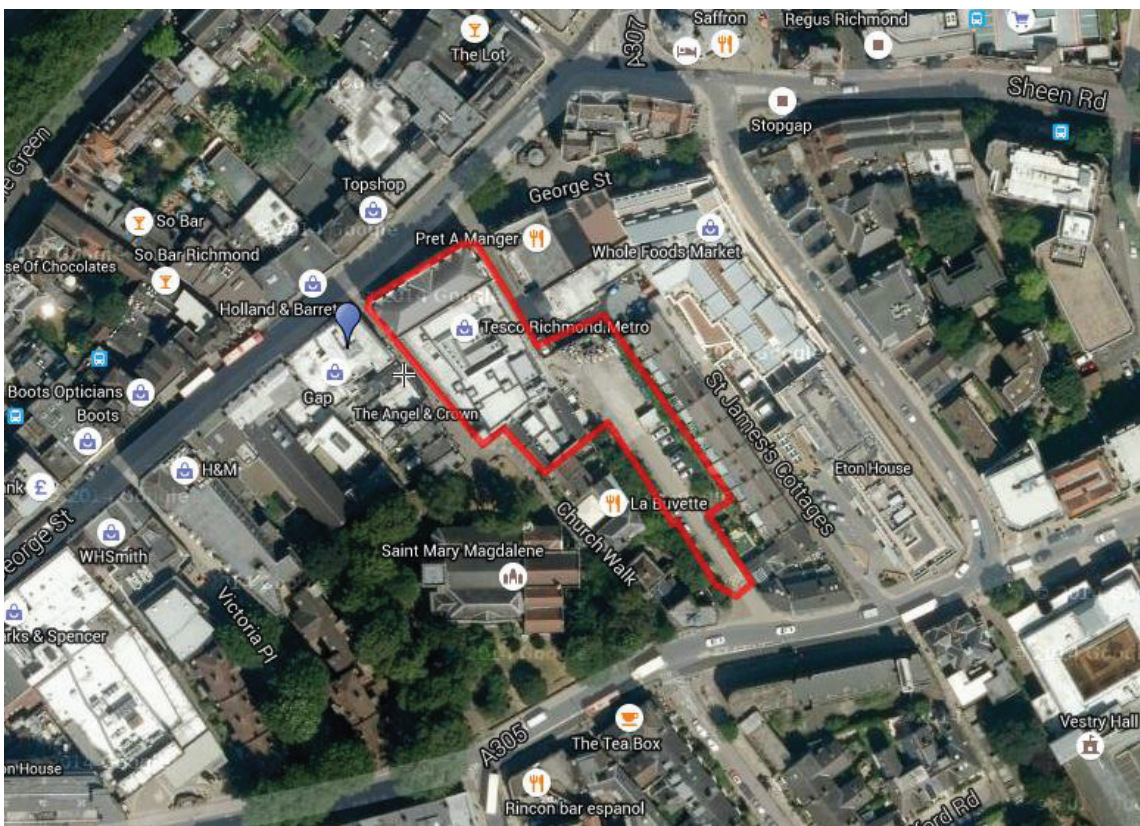


Figure 1: Aerial site photo

- 2.5 The building is bounded by Church Walk to the west which has a café, public house, hairdresser, bookstore and health and fitness businesses at ground floor with residential and office space at 1st

2nd and 3rd floor level. Church Walk is a pedestrian walkway that connects George Street and Paradise Road and passes around St Mary Magdalene church, which is located at the other end of Church Walk. It connects with Victoria Place; another pedestrian walkway that runs between George Street and Paradise Road.

- 2.6 The Tesco Metro occupies the ground floor of the building as its trading area. A Coral betting shop also occupies a small section of the ground floor for access to the upper floor unit. The Coral unit is sub-let space from Tesco. The Coral unit's trading floor is at first floor level fronting George Street. This Coral unit will remain and is not affected by the proposal.
- 2.7 Tesco occupy the majority of the 1st floor. The space is split between the area that extends across most of the George Street frontage in addition to space over the rear of this building running back along Church Court. The area subject of the application at 1st floor is currently a meeting room and three offices. The remainder of the 1st floor (not affected by the application) is used as back of house storage and staff offices and welfare space.
- 2.8 The 2nd floor space is currently used by Tesco for occasional storage and was also used as a training room for the Tesco business. The 3rd floor within the roof spaces is void with maintenance access only.
- 2.9 The retail use is serviced by an enclosed and secured service road and yard, also known as Wellington Yard, which is accessed off Paradise Road. This service road is shared with the residential properties known as St James Cottages, which are located in Church Court to the rear of the building.
- 2.10 Existing access to the site is taken via a vehicular crossover on Paradise Road located to the south of the site. The access road is approximately 6.0 m wide and provides access to a service area at the rear of the existing building. The service area includes a total of 7 staff car parking spaces.
- 2.11 The Tesco Metro store is open at 6am - 12pm Monday to Saturday and 11am - 5pm on Sundays. There are employees working at the store all day every day (in total the store employs 90 people who work different hours days and they are never all on site at once), those staff there after store closing are there to stack the shelves at night time and to clean and prepare the store for the next days' trade.

3 PLANNING HISTORY

- 3.1 An examination of the Councils online records indicates that there have been the following previous planning applications on the site. These are outlined below:
- 3.2 Planning Application Reference - 15/2993/FUL: Change of use of the 1st, 2nd and 3rd floors from ancillary retail space to from 9 flats (C3 use) with external alterations and enclosure of walkway at 1st floor, new residential access, bin store, bicycle storage, replacement of plant, new stairs to plant access and internal reconfiguration of food store at ground floor level and offices at 1st floor – Withdrawn 01/12/2015.
- 3.3 This planning application was withdrawn after meetings and discussion with the Council. It was considered to be neater to withdraw the application and then resubmit a new application (this submission) which would address points raised by both neighbours and the Council.
- 3.4 14/2177/ADV: Non-illuminated delivery, fascia and ATM signage and window vinyl's and internally illuminated bus stop signage (28 in total) – Granted 22/08/2014.
- 3.5 11/3571/ADV: Illuminated fascia and bus stop signs and non-illuminated vinyl lettering and film – Granted 04/01/2012.
- 3.6 11/1935/ADV: Erection of internally illuminated fascia and projecting signs (signs 1,5,6,7 refused); high level vinyl panels (signs 3, 4, 20 approved) and aluminium graphic panels fixed to walls (signs 17, 18, 19 approved) – Split decision 09/08/2011.
- 3.7 08/2952/FUL: Installation of combined heat and power (CHP) unit to provide a sustainable method of powering the store – Permission granted 23/12/2008.
- 3.8 05/1171/ADV: Projecting sign and ground floor window and fascia signage – Granted 10/06/2005.
- 3.9 05/1170/FUL: Erection of satellite dish and air conditioning condenser unit – Granted 27/06/2005
- 3.10 05/0569/ADV – Relocation of externally illuminated projecting sign – Granted 24/03/2005
- 3.11 05/0510/COU – Change of use from A1 retail to A2 of part of first floor and part of ground floor to form new access. Alterations to shop front entrance – Granted 21/04/2005.
- 3.12 03/1912/FUL: Installation of video rental dispenser unit within existing shop front – Refused 14/08/2003
- 3.13 03/0112/ADV: Erection of an externally illuminated fascia sign – Granted 13/03/2003

- 3.14 The applicant entered a formal pre application process with the Local Planning Authority with regard to the withdrawn application and has also discussed the principle of this submission. This comprised a formal pre-application submission made on 03/02/2015, a meeting held with the Council on 23/03/2015 and written advice issued on 25/03/2015. This written advice is provided at **Appendix A** and gives general clarity and support to the proposals, but does highlight a few areas where additional detail is required. This detail was then provided in the now withdrawn application. Further meetings and discussion were on-going with the council through the now withdrawn application.
- 3.15 It should also be noted that a similar proposal was submitted for a pre-application submission in 2007, but was not progressed, at that time the area subject of the change of use proposal was all vacant.

4 APPLICATION PROPOSAL

- 4.1 This full planning application seeks permission for the change of use of the ancillary retail void space at 2nd floor and 3rd floor level to form nine 1 bedroom flats (C3 use) with external alterations and enclosure of walkway at 1st floor, new residential access, bin store, bicycle storage, replacement of plant, new stairs to roof access and limited internal reconfiguration of food store at ground floor level.

Ground Floor Reconfiguration

- 4.2 The proposal will require a slight alteration to the ground floor rear internal sales area of the Tesco Metro to allow a suitable residential access and bin store to be created off Church Court. This is not a fundamental change to the retail unit and will result in some minor internal reconfiguration works and slight decrease in the size of the net tradable area. This is identical to the now withdrawn application.
- 4.3 The existing ground floor retail space is 1390 m² and this will be reduced by 25 m² to 1365 m². This loss will have no impact on the trading of the Metro store or the retail centre.

Residential Access to Flats

- 4.4 Residential access to the flats remains unchanged to the now withdrawn application and will be taken from Church Walk at the south west corner of the building. A revised internal stairwell will provide access to a first floor walkway (that will be enclosed) that runs along the western edge of the building and also to the upper floors. Drawings 3341 110 D and 3341 203 illustrate the proposed residential access, in addition to the adjoining refuse storage area. Details of the refuse storage are in addition to bin specifications as outlined in the Transport Statement and below.
- 4.5 As can be seen in drawing 3341 202 Rev C, there will be external alterations to the Church Court elevation. This involves amending the currently open walkway and making this enclosed. The elevation will be constructed mirroring the existing features of the building to retain the existing fenestration pattern and character of the building. This is identical to the previous withdrawn application.
- 4.6 However, the key change to this walkway is that the scheme now proposes that instead of clear glazing the walkway elevation at 1st floor will be glazed with opaque glazing. This will address concerns raised by neighbours in Church Court of possible overlooking.
- 4.7 As part of the walkway works, the balustrade, which currently runs unbroken in front of the bay windows, will be replaced with a new balustrade which will be intermittently placed in front of the new bay windows. This detail is all illustrated in drawing 3341 203.

- 4.8 In addition to the walkway being glazed with opaque glazing it is proposed that the lobby area located at the end of the new enclosed corridor / walkway at 1st floor (located at the end of the walkway on the route towards the flats from the street) will also see opaque glazing installed in the single window. This glazing can be secured in perpetuity by way of planning condition.
- 4.9 Once residents (or visitors) have accessed the flats at ground floor and come up the new stairs and along the newly enclosed corridor they will pass through a door into a secure lobby where they will only have access through a further secure door which gives them access to the 2nd floor.
- 4.10 A new lobby will be created at 1st floor to secure access to the Tesco office on the front of the building and a means of escape from the Coral unit.

The Flats

- 4.11 This application proposes 9 flats located over 2nd and 3rd floors only. The number of flats has not altered from the now withdrawn application however the application proposes just 1 bed flats where as previously there was a mix of one and two bed units over the 1st, 2nd and 3rd floors.
- 4.12 Tesco have reviewed the store and how it operates and have decided that at this time the office space located at 1st floor on the corner of George Street and Church Court cannot be lost to residential use. As such, where previously it was suggested to create a 2 bed flat this space will now remain as ancillary retail space used as offices linked to the store across a secure lobby area.

Schedule of Accommodation

- 4.13 From 1st floor level, stairs will lead up to the 2nd floor where 5 new flats are proposed, stairs then go up to 3rd floor level and provide 4 flats. The schedule below sets out the proposed accommodation.

FLOOR/No	DESCRIPTION	GIA (m ²)	GIA (ft ²)
SECOND			
FLAT 2.01	1 BEDROOM	55.6m ²	595 ft ²
FLAT 2.02	1 BEDROOM	50.0m ²	535 ft ²
FLAT 2.03	1 BEDROOM	50.0m ²	535 ft ²
FLAT 2.04	1 BEDROOM	50.0m ²	535 ft ²
FLAT 2.05	1 BEDROOM	55.0m ²	590 ft ²
THIRD			
FLAT 3.01	1 BEDROOM	56.7m ²	610 ft ²
FLAT 3.02	1 BEDROOM	51.0m ²	550 ft ²
FLAT 3.03	1 BEDROOM	51.0m ²	550 ft ²
FLAT 3.04	1 BEDROOM	56.7m ²	610 ft ²

4.14 In total, the accommodation provides 9 x 1 bed flats which fall within the space standards of the London Plan (Further Alterations to the London Plan March 2015) which are outlined below. The standards set out by the Mayor are minimum not maximum standards.

	Dwelling type	GIA sqm
	(b) bedroom	
	(p) persons-bed spaces	
	1b2p	50

4.15 The proposal is for 5 flats at 2nd floor and 4 at 3rd floor. Each flat comprises of a living space with dining area and kitchen, a separate bathroom and double bedroom. Each flat meets the required space standards as set out in Policy DM H04.

4.16 Given the building is of Townscape Merit there is no opportunity to amend the external fabric by moving windows, creating balconies etc., as such the external façade remains as existing. The council accepted this position through the last application and that due to this application being a conversion and due to the building being of Townscape Merit that outdoor amenity cannot be met or provided.

4.17 Communal storage areas are provided at both 2nd and 3rd floors for use by all residents.

4.18 A new stair case needs to be provided to give access from the 2nd to 3rd floor as the current stair access is not adequate.

4.19 The council advised during the previous application that more ‘smaller’ units i.e. one bed units should be provided due to the sites central location, this is now being achieved with 100% of the units being one bed, and as such fully accords with Policy CP14 and DM H04.

Affordable Housing

4.20 The affordable housing position was raised during the now withdrawn application. The previous application proposed 9 flats over 1st, 2nd and 3rd floors, and the Council considered the flats were being made too large, and as such a further unit could have been provided which would have resulted in 10 flats and the council then seeking on-site affordable housing being provided.

4.21 This application now submitted demonstrates that 9 flats can be provided over the top two floors (as suggested by the Council) however the scheme does omit a flat at 1st floor (as the applicant now considers this space should be retained for ancillary retail use). As such affordable provision for this application is based on 9 flats.

4.22 Council policy states a contribution in lieu of on-site provision for a 9 unit scheme would be sought, as such using the Council calculator this would provide a contribution of £620,000. The applicant confirms acceptance to this contribution and as such a S106 agreement will be required to secure this payment.

Refuse Store

4.23 This application proposes a refuse store located in the same position as the now withdrawn application, i.e. adjacent to the residential access on Church Court. The bin store can be accessed from the residential lobby so residents do not need to go outside if they are not leaving their flats, but there is also an access directly onto Church Court so that the bins can be moved on collection day to a designated area.

4.24 It has been agreed with the council that a bin store of the size proposed is more than adequate to serve 9 flats. The store is designed with air vents to allow suitable ventilation. The store will allow for 5 x 360 litre bins as agreed with the Council and as demonstrated in the submitted plans.

4.25 The bin store is created from the slight reduction to the retail store floor area.

4.26 It is proposed that there is a management plan in place, and controlled by planning condition attached to any decision so that the bins are moved on collection day only at an allotted time (to be agreed with the Council) and then returned back on the same day at an agreed time. The bins would be positioned in a holding area at the end of Church Court, between the BT kiosk and the bollards, a location suggested by the Council. This manoeuvre would only take place on collection days and is managed by the applicant and controlled by the council.

4.27 It was suggested that the refuse store opposite the War Memorial and Church would have negative impacts on this area. This is not the case. As highlighted there will be management of the bin / refuse store, but it should also be highlighted that residents of the new flats would not allow the bin store to become unacceptable in terms of noise or dirt as this is adjacent to their front door to the flats.

Cycle Parking and Car Parking

4.28 A bike store is to be located in Wellington Yard. This will be located within the adjacent Wellington Yard service area that also acts as a parking area for Tesco store staff. As shown in drawing No.

3341 110 D, the cycle storage will be located next to the existing sub-station. This will be a timber clad Falcotel-K shelter and will adjoin the existing substation in Wellington Yard to the south. Details of this can be found in the Transport Statement. The proposed cycle enclosure will allow for at least 9 bikes in a secure, water tight enclosure which is accessible by residents all day every day.

4.29 The cycle storage will result in the loss of 1 car space, resulting in 6 staff spaces and will allow sheltered parking for 9 bikes. The loss of one car park space will not be an issue and should be welcomed by the council in this accessible location (PTAL 6A), given that the vast majority of staff travel to work by public transport.

4.30 Employees that drive to the store for overnight working are able to park in the service yard as there are no deliveries overnight. The store has deliveries within their restricted window of 7am -7pm and there is a 4am delivery however that is to the front-of the shop. The evening delivery arrives before 7pm.

4.31 It should be highlighted that there is no guidance on the distance of a cycle store from a flat or house. The cycle store is a 125m walk from the residential access and at an average walking speed (1.2m/s), that would take around 1.6 minutes to walk. The document 'Inclusive Mobility', produced by the Department for Transport (DfT) to provide guidance on access for those with disabilities and those without disabilities to pedestrian and transport infrastructure, states that:

“Regular bus services designed particularly with elderly and disabled people in mind, such as the Swedish Service Routes have bus stops at more frequent intervals, typically every 200 metres. This figure is in accord with research that shows that for disabled people, bus use falls off sharply if the distance is more than 200 metres (250 metres for able-bodied people).”

4.32 While the above clearly applies to bus use, the principles of acceptable distances to sustainable modes of transport are directly comparable for cycle use and as such, it is clear that the cycle storage facilities being within 125m of the dwellings are well within acceptable walk distances, even for the mobility impaired, and certainly for the able bodied.

4.33 We are not aware that Richmond has any specific guidance on this matter and as such this data has been judged to illustrate acceptable distances.

4.34 Further to the Transport officer's comments on the withdrawn application, there are in fact no staff class A1 cycle spaces being provided as part of this application as this planning application relates to the creation of the 9 flats only. We are only dealing with a very minor retail reduction of floor area and as such cycle spaces are for residents only.

- 4.35 The transport officer also stated on the withdrawn application that “Dwg 110 R A shows the public stands, but the proposed ground floor plan doesn’t”. Drawing 110 Rev A was never submitted as a formal drawing. To clarify, the submitted drawing is 3341 110 Rev D and this shows no public cycle stands.
- 4.36 The proposed cycle enclosure will allow for at least 9 bikes in a secure, water tight enclosure which is accessible by residents all day every day. This enclosure is proposed to be provided in place of one staff parking bay but the loss of the parking bay is not deemed an issue.
- 4.37 As was discussed during application 15/2993/FUL, a S106 agreement restricting residents and visitors and season ticket permits to council car parks and membership of a car club for 5 years can be agreed.
- 4.38 It is proposed that the flats will be car free and no car parking spaces are being proposed as part of this application.

Other matters

- 4.39 Also proposed as part of the application is the replacement of plant equipment. The proposed second floor plan (drawing 3341 102 G) shows the replacement plant equipment being located within the existing screened enclosure at roof level on the building which adjoins the Building of Townscape Merit. The proposed refrigeration units are to replace the existing internally housed refrigeration compressors.
- 4.40 The stair currently used by Tesco for access to the roof will be replaced with a new stair wholly within their new demise which will create a new small brick enclosure at 2nd floor roof level on the rear elevation of the flats. This proposal can be seen in drawing 3341 102 G.

5 PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise. National and Local Planning Policy are both used as considerations in the determination of planning applications.

5.2 In this chapter, the national Planning Policy is considered initially in the sections below and then the relevant Local Planning Policy is outlined.

National Planning Policy

5.3 The National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied. This is an important material consideration.

5.4 The following national planning policy and guidance has been considered in respect of the application:

5.5 The National Planning Policy Framework (published on the 27th March 2012) sets out the Government's planning policies for England and how these are expected to be applied, paying particular regard to achieving sustainable development.

5.6 The Framework does not change the statutory status of the development plan as 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.

5.7 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (paragraph 14). For decision-taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted

5.8 Within the overarching roles that the planning system ought to play, paragraph 17 details a set of core land-use planning principles which should underpin both plan-making and decision-taking. There are 12 core principles and include (amongst others) the requirement that planning should:

“Proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs.”; and “not simply be about scrutiny, but instead a creative exercise in finding ways to enhance and improve the places in which people live their lives”.

- In the section ‘Delivering Sustainable Development’, it states that the Government is committed to building a strong competitive economy and securing economic growth in order to create jobs and prosperity. Significant weight should be placed on the need to support economic growth through the planning system and planning policies.
- Paragraph 21 states that investment in business should not be over-burdened by the combined requirements of planning policy expectations, and paragraph 23 states the importance that the needs for retail, leisure and other town centre uses should be met in full.
- Paragraph 70 states that to deliver the social, recreational and cultural facilities and services that a community needs, planning policies and decisions should, inter alia, plan positively for the provision and use of shared space and community facilities and local services to enhance the sustainability of communities and residential environments.

5.9 With regard to ensuring the vitality of Town Centres, planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.

5.10 With regard to decision-taking, Paragraph 187 of the NPPF states that Local Planning Authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

Local Planning Policy

5.11 The Local Plan, (previously known as the Local Development Framework) sets out the priorities for the development of the Borough and will be used for making decisions on the planning applications. It consists of a number of documents and guidance, including the Core Strategy, Development Management Plan, Twickenham Area Action Plan and saved Unitary Development Plan and Supplementary Planning Documents.

The London Plan consolidated with alterations since 2011 (March 2015)

- 5.12 Policy 1.1 with regard to delivering the strategic vision and objections for London states that growth and change in London will be managed in order to realise the Mayor's vision for London's sustainable development to 2036 and his commitment to ensuring all Londoners enjoy a good, and improving quality of life sustainable over the life of this Plan and into the future.
- 5.13 Policy 2.6 in relation to Outer London: Vision and Strategy, states that the Mayor will, and boroughs and other stakeholders should, work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches through LDFs and other development frameworks to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements.
- 5.14 Policy 2.6 in relation to transport also states that the Mayor will, and boroughs and other stakeholders should, recognise and address the distinct orbital, radial and qualitative transport needs of outer London in the context of those of the city region as a whole by encouraging greater use of cycling and walking as modes of choice in outer London.
- 5.15 Policy 3.3 with regard to increasing housing supply states that the Mayor will seek to ensure the housing need identified is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners. The minimum ten year target for Richmond between 2015 and 2025 is 3,150. The annual monitoring targets 315.
- 5.16 Table 3.2 with regard to sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare) outlines that development of this nature in this location with 2.3 – 3 habitable rooms per unit should have 215 – 405 units per hectare.
- 5.17 Policy 3.5 with regard to quality and design of housing developments states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live.
- 5.18 Table 3.3 outlines the minimum space standards for new development. In one bed flats for one person, 37 sqm of GIA should be provided. In one bed flats for 2 people, 50sqm is required.
- 5.19 Policy 3.8 with regard to housing choice states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. Boroughs should work with the Mayor and local

communities to identify the range of needs likely to arise within their areas and ensure that: a new developments offer a range of housing choices,

- 5.20 Policy 3.13 in relation to affordable housing thresholds states that Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes.
- 5.21 Policy 7.4 with regard to local character states that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.
- 5.22 Policy 7.8 with regard to heritage assets and archaeology states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

[The Mayor of London's Housing Supplementary Planning Guidance](#)

- 5.23 The SPG provides detail on how to carry forward the Mayor's view that "providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighbourhoods". It is informed by the Government's National Planning Policy Framework and by its Housing Strategy for England.

[Core Strategy \(Adopted April 2009\)](#)

- 5.24 The Core Strategy, adopted on 21 April 2009, is a policy document which determines the future development of the borough over the next 15 years. The relevant policies from the Core Strategy are outlined below:
 - 5.24.1 Policy CP1 in relation to Sustainable Development seeks to maximise the effective use of resources and assist in reducing any long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction checklist, including the requirement to meet the Code for Sustainable Homes level 3 (for new homes), Ecohomes "excellent" (for conversions) or BREEAM "excellent" (for other types of development). An Appropriate location of land uses, making best use of land and reducing environmental impact are principals that will be sought. Environmental gain to compensate for any environmental cost of development will also be sought.
- 5.25 Policy CP2 in relation to Reducing Carbon Emissions states that the Borough will reduce its carbon dioxide emissions by requiring measures that minimise energy consumption in new development and promoting these measures in existing development, particularly in its own buildings. The Council will increase the use of renewable energy by requiring all new development to achieve a

reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible, and by promoting its use in existing development.

- 5.26 Policy CP7 with regard to maintaining and improving the Local Environment states that existing buildings and areas in the Borough of recognised high quality and historic interest will be protected from inappropriate development and enhanced sensitively, and opportunities will be taken to improve areas of poorer environmental quality. All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they: (i) are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity; (ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.
- 5.27 Policy CP8 in relation to Towns and Local Centres states that the Borough's town and local centres have an important role, providing shops, services, employment opportunities, housing and being a focus for community life. Retail and town centre uses will be supported providing that it is appropriate to the role in the hierarchy of the centres, and respects the character, environment and historical interest of the area. It should be of an appropriate scale for the size of the centre and not adversely impact on the vitality and viability of any existing centre.
- 5.28 Policy CP14 in relation to housing targets states that the Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Development Framework policies.
- 5.29 In relation to Housing Standards and Types, Policy CP 14.D states that the density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies.
- 5.30 Policy CP 14.E states that all housing should be built to Lifetime Homes standards and 10% of all new housing should be to wheelchair standards. The private sector element of any development will include an appropriate number of small (1-bed) units, depending on location. This would be at least 25%, rising to the great majority (at least 75%) in more sustainable locations, such as town centres and other areas with high public transport accessibility and with good access to facilities.
- 5.31 Policy CP15 states that housing provision is expected to include a range of housing to meet the needs of all types of households. Over the LDF period the Council expects 50% of all new units will

be affordable housing, with a tenure mix of 40% housing for social rent and 10% intermediate housing.

- 5.32 Policy CP 15.B states that some form of contribution towards affordable housing will be expected on all new housing sites. The contribution towards affordable housing on sites involving new-build housing will be as follows:
- i. On sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development. The amount involved will be set out in the Development DPD and will be reviewed annually.

Development Management Plan (Adopted November 2011)

- 5.33 Policy SD1 in relation to sustainable construction states that all development should include measures capable of mitigating and adapting to climate change to meet future needs. New buildings should be flexible to respond to future social, technological and economic needs by conforming to the Borough's Sustainable Construction Checklist SPD. New homes will be required to meet or exceed requirements of the Code for Sustainable Homes Level 3. They also must achieve a minimum 25 per cent reduction in carbon dioxide emissions over Building Regulations (2010) in line with best practice from 2010 to 2013, 40 per cent improvement from 2013 to 2016, and 'zero carbon' standards (2) from 2016.
- 5.34 Policy SD2 in relation to Renewable Energy and Decentralised Energy Networks states that new development will be required to conform with the Sustainable Construction Checklist SPD and: (a) Maximise opportunities for the micro-generation of renewable energy. Some form of low carbon renewable and/or de-centralised energy will be expected in all new development, and (b) Developments of 1 dwelling unit or more, or 100sqm of non-residential floor space or more will be required to reduce their total carbon dioxide emissions by following a hierarchy that first requires an efficient design to minimise the amount of energy used, secondly, by using low carbon technologies and finally, where feasible and viable, including a contribution from renewable sources. (c) Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where there is no over-riding adverse local impact. (d) All new development will be required to connect to existing or planned decentralised energy networks where one exists. In all major developments and large Proposals Sites identified in the (forthcoming) Site Allocations DPD, provision should be made for future connection to a local energy network should one become available.
- 5.35 Policy DM SD 3 in relation to Retrofitting states that high standards of energy and water efficiency in existing developments will be supported wherever possible through retrofitting. Proposals for conversions and extensions will be encouraged to comply with the Sustainable Construction

Checklist SPD as far as possible and opportunities for micro-generation of renewable energy will be supported.

- 5.36 Policy DC1 with regard to Design Quality states that new development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively, to its surroundings based on a thorough understanding of the site and its context. In assessing the design quality of a proposal the Council will have regard to the following:
- compatibility with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form
 - sustainable development and adaptability, subject to aesthetic considerations
 - layout and access space between buildings and relationship to the public realm
 - detailing and materials
- 5.37 Policy DM DC 2 with regard to the Layout and Design of Mixed Use Schemes states that within appropriate areas, mixed use schemes will be permitted if they:
- 1. Include a suitable and compatible mix of uses
 - 2. Add to the vitality and convenience of the area
 - 3. Take account of any potential adverse impacts of the juxtaposition of uses through the layout, design and operation of the area
 - 4. Make the best use of land by sharing facilities and areas such as for parking, servicing, entrance-ways and amenity space where appropriate.
- 5.38 Policy DC 5 in relation to Neighbourliness, Sunlighting and Daylighting states that In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. To protect privacy, for residential development there should normally be a minimum distance of 20 m between main facing windows of habitable rooms. The Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings, and that adjoining land or properties are protected from overshadowing in accordance with established standards.
- 5.39 Policy HO 4 with regard to Housing Mix and Standards Development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location. All new housing development including conversions, are required to comply with external and internal space standards. The Council will only grant planning permission for new dwellings that provide adequate

internal space and appropriate external private and/ or communal amenity space to meet the needs generated by the development.

- 5.40 Policy HO 6 states that the Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to the strategic borough-wide target and the individual circumstances of the site, in accordance with Policy CP15. On sites capable of less than 10 units gross, a financial contribution to the Affordable Housing Fund commensurate with the scale of development will be required. For sites providing 9 units, 45% of homes are to be affordable which equates to 4.05 homes.
- 5.41 As outlined in Core Strategy Section 7.2 Costs and Viability, in considering proposals or financial contributions, the Council will have regard to economic viability; individual site costs; the availability of public subsidy; and the overall mix of uses and other planning benefits.
- 5.42 Policy TC1 in relation to Larger Town Centres states that in order to maintain and improve the town centres, the Council will require appropriate development to take place within the identified Town Centre Boundaries of the five main town centres. Proposals that contribute towards a suitable mix of uses will be approved, provided that they are appropriate to the function, character and scale of the centre. Acceptable town centre uses could include retail business, leisure, tourism, community uses, health and residential development compatible with other development in the town centre. Proposals will be acceptable within the Town Centre Boundaries if they:
- Contribute towards meeting the future needs of the centres
 - Make more efficient use of land than previous development or bring about other benefits.
 - Reduce the need for travel
 - Are of a scale that enhances the vibrancy and vitality of the centre and do not erode the core function of the centre,
 - Maintain or enhance the amount of active frontage
 - Respect and enhance the heritage, character and local distinctiveness of the centre
- 5.43 Policy DM TC3 states that The Council will act to protect the existing retail areas of the town centres by controlling changes of use from retail. The Council has Proposals that result in a loss of retail space in key shopping frontages will be generally resisted.
- 5.44 Policy TP 2 in relation to Transport and New Development states that the impact of new development on the transport network will be assessed against other plan policies and transport standards. All planning applications for major developments should be accompanied by a Transport Assessment and for smaller developments should be accompanied by a Transport Statement.

- 5.45 Policy DM TP 6 with regard to walking and the pedestrian environment states that in order to protect, maintain and improve the pedestrian environment, the Council will ensure that new development and schemes protect, maintain and, where appropriate, improve the existing pedestrian infrastructure, including the Rights of Way network.
- 5.46 Policy TP 7 with regard to cycling states that in order to maintain and improve conditions for cyclists, the Council will ensure that new development or schemes do not adversely impact on the cycling network or cyclists and provide appropriate cycle access and sufficient, secure cycle parking facilities.
- 5.47 Policy TP 8 with regard to off street parking states that a set of maximum car parking standards and minimum cycle parking standards are set out in Appendix Four - Parking Standards will be expected to be met, unless it can be shown that in proposing levels of parking applicants can demonstrate that there would be no adverse impact on the area in terms of street scene or on-street parking.
- 5.48 Policy DM HD 1 states that buildings or parts of buildings, street furniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained. New development (or redevelopment) or other proposals should conserve and enhance the character and appearance of the area.
- 5.49 Policy DM HD 3 Buildings of Townscape Merit The Council will seek to ensure and encourage the preservation and enhancement of Buildings of Townscape Merit and will use its powers where possible to protect their significance, character and setting, by the following means:
- 1. consent will not normally be granted for the demolition of Buildings of Townscape Merit;
 - 2. alterations and extensions should be based on an accurate understanding of the significance of the asset including the structure, and respect the architectural character, and detailing of the original building. The structure, features, and materials of the building which contribute to its architectural and historic interest should be retained or restored with appropriate traditional materials and techniques;
 - 3. any proposals should protect and enhance the setting of Buildings of Townscape Merit;
 - 4. taking a practical approach towards the alteration of Buildings of Townscape Merit to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building's special interest is not harmed, using English Heritage advice as a basis.

Supplementary Planning Documents

Buildings of Townscape Merit

- 5.50 The Council will endeavour to protect the character and setting of all Buildings of Townscape Merit through negotiation of a sympathetic scheme, as far as possible treating proposals for works to or close to them as if they were listed buildings.

6 PLANNING CONSIDERATIONS

6.1 The key considerations in the determination of this application are considered under the respective headings below.

- Principle of Development
- Loss of Existing Use
- Density
- Design
- Refuse storage
- Space and amenity standards
- Impact on Amenity of the adjoining properties
- Transport matters
- Sustainability
- Affordable Housing
- Lifetime Homes
- Community Infrastructure Levy
- S106 / Heads of Terms

Principal of Development

6.2 The NPPF seeks to promote sustainable development. With this in mind, the site is located in an area where a large number of buildings have residential dwellings located on the upper floors. The proposal will therefore not be out of character with the surrounding area.

6.3 The proposed scheme will deliver high quality housing for local people and will help to address local housing demand. As set out in Policy 3.3 of the London Plan, there is a need for 315 houses per year in Richmond in order to meet the ten year housing requirement of 3,150 between 2015 – 2025. The proposal would contribute to this requirement.

6.4 Policy CP8 of the Core Strategy 2009 states that the Boroughs town centres have an important role, which includes providing housing. Policy TC1 also includes residential dwellings as an acceptable use within larger town centres such as Richmond and also states that such a use will be approved providing that it is appropriate to the character, scale and function of the town centre.

6.5 The principle of a residential development in this location is therefore considered acceptable (and the most appropriate) use, subject to the design, highway and amenity policies of the adopted Plan.

Loss of Existing Use

- 6.6 The conversion of the existing property is by no means onerous as it principally an exercise to reinstate the former use of the building.
- 6.7 The Tesco store has a significant back of house area at 2nd floor in addition to vacant 3rd floor space which is underutilised. Due to sufficient space over the bulk of the store at 1st floor level and other offices, this space is surplus to requirements. The current use therefore does not fully utilise the space as is required by the NPPF. The proposal makes good use of surplus ancillary retail space in addition to utilising the unused 3rd floor vacant space, in accordance with policy CP1.
- 6.8 Policy DM TC 1 states that proposals that contribute towards a suitable mix of uses will be approved, provided that they are appropriate to the function, character and scale of the centre. The proposal adheres to this policy due to the fact that it is diversifying uses through the addition of the residential use which previously didn't exist. Due to the fact that minimal external alterations are being made, the proposal is also appropriate to the function, character and scale of the centre.
- 6.9 As the site is located within a key shopping frontage, Policy DM TC3 has been taken into consideration. The proposal will only result in the loss of ancillary retail space on the 2nd floor and vacant space on the 3rd, so is not in opposition to TC3 which opposes the loss of retail uses. Due to the fact that this space is underused, and is only ancillary to the Tesco Metro, it is not considered to be purely retail use. Although the development involves the reconfiguration of the ground floor which will result in the loss of a very small amount of retail space, this will be minimal and the viability of the ground floor unit to act in a retail capacity will not be compromised, and will not be detrimental to Policy DM TC 3.
- 6.10 Paragraph 4.2.29 of the Development Management Plan also states that providing that the viability of the ground floor unit to act in a retail capacity is not compromised; changes of use away from retail on other floors would not be contrary to the frontage policy. The residential development will therefore not have an adverse effect on the commercial ground floor unit, in accordance with Policy CP1 and CP14.
- 6.11 The pre application response from the Local Planning Authority also stated that the Council has not objected to the loss of ancillary space and therefore will take the same approach now.
- 6.12 As such, the loss of the existing use in this instance is considered to be wholly appropriate and beneficial for the location.

Density

- 6.13 The proposal offers nine 1 bed units. This is in accordance with Policy CP14 which requires the provision of at least 75% of 1 bed units in sustainable locations such as Richmond Town Centre.
- 6.14 In terms of achieving the maximum intensity of use, the development provides 9 flats which is the maximum amount possible, due to the location of the windows in this Building of Townscape Merit, and London Plan table 3.3 requirements regarding minimum flat sizes. In order to increase the number of flats, external alterations which would include the relocation or blocking off of windows would be required. It is considered that this would negatively affect the appearance of the building of townscape merit in the Conservation Area. The reduction of flat sizes would also be required which would result in the scheme not being in accordance with table 3.3 of the London Plan.
- 6.15 Although Policy CP14 states that the maximum density is to be provided, this should not be at the expense of the character, amenity or quality of the immediate area. It is for these reasons that 9 flats are proposed and this is considered to be in accordance with policy CP14.

Design

- 6.16 The conversion of the existing property is by no means onerous as it principally an exercise to reinstate the former use of the building. Due to the fact that the development proposals are minimal in terms of external alterations, the external appearance will largely remain the same and the character and quality of the building will remain intact. It is therefore considered to be in accordance with Policy DC1 which requires new development to be of a high architectural and urban design quality and respect local character.
- 6.17 The majority of the alterations are to the rear of the property and therefore are not in view of the busy exposed frontage on George Street and have no impact on the Building of Townscape Merit. The development is however within close proximity to the listed St Marys Magdalene Church to the rear and the alterations have been designed with this in mind, so as not to impact, harm or detract from the Church and its setting.
- 6.18 The applicant understands the importance of the Building of Townscape Merit and the proposals have very much taken this into account when considering any proposals. Each of the external proposals serve to conserve and are sympathetic to the building, surroundings and Conservation Area, in accordance with Policy DM HD1 and HD 3 of the DMP 2011.
- 6.19 The main external changes are occurring to the Church Court façade incorporating the opaque glazed walkway and lobby. This provision works well with the existing building and allows views through the structure to the existing building. This aspect of the proposal would not result in the loss

of architectural features and materials due to unsympathetic alterations, as is required by the Conservation area Statement, Policy CP7 and Policy 7.4 of the London Plan.

- 6.20 The residential access and bin store entrances have been designed in consideration of the grounds of the listed Church. The proposed entrance is located where three opaque windows already exist. It is proposed that a door is placed where the middle window currently exists. As such, the proposed entrance does not detract from the building or its wider settings and will retain the rhythm and character of the elevation and the immediate Church Court area.
- 6.21 The refuse storage entrance is located next to the proposed entrance and next to where a door currently exists. Due to the fact that a door already exists in this location, the implementation of a new door slightly to the right ensures that any design impacts on the elevation of the building in Church Court is minimal.
- 6.22 The hardwood panelled material used for both the refuse storage and residential entrances is also considered to be of a high quality and will in fact enhance the appearance of the elevation and immediate surroundings. Panels will also be added to the windows which is an improvement on the current situation.
- 6.23 The other proposal that is to be externally located is the cycle storage facility located within Wellington Yard. The materials used are of a high quality and are aesthetically pleasing. It is considered that its design is wholly appropriate for its siting.
- 6.24 For further details on matters surrounding design, and how this has evolved following these discussions please refer to the supporting Design and Access Statement.

Location of residential access

- 6.25 The Church Court frontage was considered the most appropriate and attractive adjunct for access to the residential access. The location of the residential access at Church Court is also in accordance with policy DM DC 2 which requires proposals to take account of any potential adverse impacts of the juxtaposition of uses and make the best use of land by sharing facilities and areas such as for entrance-ways and amenity space where appropriate. The siting of the door in this location will have no adverse impact on the ground floor commercial unit due to its separation from the commercial unit and also the surrounding residential properties.

Refuse Storage

- 6.26 As is outlined in the Refuse and Storage Requirements SPD (Adopted April 2015), 9 x 1 bed flats require 1290 litres of waste storage. This requirement can be exceeded however if required, as is

illustrated in drawing 3341 100 D which illustrates 5 x 360 litres bins which equates to a total 1900 litre of waste storage.

- 6.1 The proposed bins are 360 litres each for ease of manoeuvrability and they will be able to fit between the bollards at George Street as part of the management and collection strategy.
- 6.2 The bins are proposed to be located in a bin store accessed both off the residential entrance lobby and with direct access from the street, as illustrated in drawing 3341 100 D. This means residents do not have to go outside to dispose of rubbish if they are not planning on leaving the development, but does mean that the bins can also be collected without operatives in charge of bin collection needing to enter the residential lobby. The doors from the street will open inwards into the development.
- 6.3 The refuse collections will be managed and the location of the bins would not have a negative impact on the immediate setting. The bins will be stored inside in a ventilated store and will therefore be out of site and will be managed to ensure that issues such as odour and visual impacts are not of concern. This will ensure that the proposed refuse location will not detract from the adjoining war memorial.
- 6.4 The bins cannot and will not be stored externally except at a designated location on collection day when the collection process will be managed and controlled and agreed. The council can control this by way of planning condition if this is deemed necessary and something the applicant would not object to as again it will ensure the development does not harm the sites setting or entrance to the flats.
- 6.5 A management plan will also be in place and someone will be appointed to move the bins on collection day. This can form part of a planning condition to ensure that this is carried out in accordance with agreed procedure.
- 6.6 The applicant is also happy to agree to a condition requiring that the bins are placed on Church Court between the BT kiosk and the bollards between 5.30am and 6.00am and once collection is complete, they must be rehoused by 7.00am.
- 6.7 Drawing 3341 100 D illustrates the proposed bin collection point on Church Court and the surrounding bollards, kiosks and cabinets.

Space and Amenity Standards

- 6.8 The internal unit sizes exceed the Councils baseline standards as set out in the Residential Development Standards SPD but are in accordance with the London Plan standards. Given that

this proposal is for a conversion of existing space, it is not possible to provide on-site amenity space, as is required by Policy HO 4 and the Residential Development Standards SPD.

- 6.9 It is considered however that because the unit sizes exceed the Council standards, this compensates for the lack of on-site amenity space. However, it is reiterated that the flats as part of a change of use scheme has to 'retrofit' into an existing building which is deemed to be of Townscape Merit. External alterations would damage the building and its wider setting so is not deemed suitable.
- 6.10 In order to provide amenity space, the addition of balconies would be required. As the building is a site of Townscape Merit, the addition of balconies would detract from the character of the building and is therefore considered unsuitable for this proposal.
- 6.11 The flats are all 1 bed flats which are considered to be in accordance with policy DM HO 4 on Housing Mix and Standards.

Impact on the amenity of adjoining properties

- 6.12 Policy DC 5 states that in considering proposals for development, the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. The nearest residential properties are located on the upper floors of the properties on the other side of Church Walk.
- 6.13 The proposed scheme has been prepared with consideration for the impact on residential amenity. In respect to protecting the amenities of the nearby occupiers, the scheme ensures that any impacts resulting from the development are kept to a minimum.
- 6.14 In terms of noise and disturbance impacts, a noise report has been undertaken by Sharps Redmore and submitted in support of this application. In summary, the report concludes that the proposed development could proceed without the likelihood of existing noise sources harming the amenity of future residents. It also concluded that noise from the replacement refrigeration equipment would not lead to an increase in the existing background noise levels at the closest residential properties on Church Court. The development is therefore in accordance with Policy DC 5.
- 6.15 In terms of privacy, the proposal is unlikely to create an unacceptable increase in overlooking. To protect privacy, development should be 20m between the main facing windows of habitable rooms. However, as recognised in the SPD 'Small and medium housing sites', where principle windows face a wall that contains no windows or these are occluded, separation distances can be reduced to 13.5m. Any principle windows will not be in breach of this requirement.

- 6.16 Although the 1st floor walkway along Church Court is within close proximity to the 1st floor flats of the properties on the other side of the alley way, the walkway glazing is to be opaque and none of the habitable rooms will be overlooking any of these properties. The walkway is a circulation area and the glazing will be opaque and therefore would not have a negative effect on the amenity of the neighbouring properties in terms of overlooking or privacy.
- 6.17 The applicant proposes that the council attach a planning condition to the decision which states that the opaque glazing is maintained in perpetuity in the relevant windows unless otherwise agreed by the council, so as to ensure there is no loss of amenity of the existing residents of Church Court.
- 6.18 In addition to this, the proposed flats are to be located towards the front of the building and will predominantly only overlook George Street.
- 6.19 The BREEAM Assessment has undertaken sample daylight calculations based on the architects drawings and the kitchen/living/dining room meets the required minimum daylight factor of 2% in Kitchens and 1.5% in living rooms. In terms of daylight for adjoining properties, the proposal will have no effect on this due to the fact that the development does not include any extensions or other proposals that would have an impact on sunlight levels for nearby properties.
- 6.20 In terms of visual intrusion, due to the fact that the alterations are mainly internal and any external alterations will be minimal, it is considered that the negative visual impacts of the development are non-existent and is therefore not in breach of DC 5.
- 6.21 As is discussed in paragraph 6.3, the proposal will also not cause issues relating to odours.
- 6.22 The proposal also adheres to the residential development standards SPD which require that developments don't create a sense of closure or are overbearing in any way.

Transport matters

- 6.23 As is required by Policy DM TP2, the impact of new developments on the transport network needs to be assessed. The Transport Statement which has been submitted in support of this application assesses these impacts in detail.
- 6.24 The proposed scheme will provide a cycle store for a minimum of 9 cycles in accordance with the Borough's standard of 1 space per dwelling, as is outlined in Appendix 4 of the Adopted Development Management Plan (November 2011). This is also in accordance with Policy TP 7 which requires development to provide secure cycle parking facilities and Policy 2.6 of The London Plan.

- 6.25 Given the town centre location and the high level of public transport accessibility and PTAL 6A rating, it is not proposed to provide parking for the residential units. This is in line with Policy CP8 of the Core Strategy which requires that housing development is car free and also 2.6 of the London Plan which promotes the encouragement of sustainable transport modes. In the absence of any on-site parking, it is highly unlikely that the proposed scheme will have any material impact on the highway network.
- 6.26 The location of the cycle storage area would also reduce the existing staff parking by 1 space. Given the excellent PTAL rating, this is not considered to be an issue however and is still in accordance with Appendix 4 of the Development Management Document which requires 1 space per 500sqm in addition to Policy 2.6 of the London Plan which encourages car free travel.
- 6.27 Further details on transport related issues can be found in the Transport Statement prepared by Transport Planning Associates (TPA) which has been submitted in support of this application. This includes details on the arrangements for the collection of refuse and specifications of the bins.
- 6.28 The proposal also does not adversely impact on the pedestrian environment, in accordance with Policy DM TP 6.

Sustainability

- 6.29 Given that the proposal seeks the refurbishment of an existing building, it is considered that the proposal is generally compliant the aims and objectives of the NPPF, Core Strategy 2009 and development management Plan 2011 in providing a more sustainable environment.
- 6.30 Due to the nature of the development, it is considered to be sustainable. The proposals are in accordance with Policy CP1 which requires an appropriate uses of land and in particular seeks the retrofitting of the building rather than redevelopment.
- 6.31 A BREEAM Domestic Refurbishment Pre-Assessment report has also been prepared by AECOM in support of this planning application. The conversion complies with the Sustainable Checklist SPD and meets the BREEAM Domestic Refurbishment excellent rating. This includes a sustainable Construction Checklist which ensures that the proposal meets the sustainable ratings. This is in accordance with policy CP 1 and also addresses the requirements of policy DM SD2 and SD3.
- 6.32 The BREEAM Assessment also assesses pollution, in accordance with Policy CP2 which states that the Borough will reduce its carbon dioxide emissions by requiring measures that minimise energy consumption in new development and that it will increase the use of renewable energy.

Affordable Housing

- 6.33 Policy HO6 states that on sites capable of less than 10 units gross, a financial contribution to the Affordable Housing Fund commensurate with the scale of development will be required. For sites providing 9 units, 45% of homes are to be affordable which equates to 4.05 homes. This will result in a contribution being made and secured via a Section 106 Agreement amounting to £620,000 which the applicant confirms they will sign up to.

Lifetime Homes

- 6.34 Policy CP14 states that all new homes should be built to lifetime Home Standards and 10% to wheelchair standards. Because of the physical constraints and arrangement of both the existing and proposed developments, and the location of the proposed residential entrance, no lift can be configured to serve all levels and no disabled access can be provided. This would be achievable but would either impact on the retail store or the setting of the conservation area and Building of Townscape Merit.
- 6.35 Given the above and the general highly sustainable and accessible location of this proposal it is considered that on balance the benefits of utilising under-used space at upper levels out-weighs the fact the step free access cannot be provided at this location.

Community Infrastructure Levy

- 6.36 In accordance with both the Mayors and the London Borough of Richmond upon Thames procedures, the applicant is mindful that a CIL tariff will apply to this scheme.
- 6.37 CIL will only be liable upon the 3rd floor as this space is vacant and has never been used, whereas the space at 2nd floors has been used by Tesco in the last 3 years for more than 6 months and is still used intermittently for general storage.

S106 / Heads of Terms

- 6.38 The applicant acknowledges that there will be a requirement for a legal agreement to address matters such as CIL as set out above in relation to the 3rd floor space which is vacant and will discuss this with the council through the application process.
- 6.39 Furthermore S106 Heads of Terms will relate to the affordable housing contribution and the council have also requested a contribution towards street lighting of £3,000.

7 SUMMARY AND CONCLUSIONS

- 7.1 It is concluded that the development meets the requirements of national and local policy by providing a sympathetic and proportionate form of development that would not appear incongruous within the context of the Building of Townscape Merit and surrounding area, would not negatively affect the aesthetic appearance of the Conservation Area, would not lead to matters of highway or pedestrian safety and would not adversely impact upon the amenities of immediate residential occupiers.
- 7.2 In order to focus attention on the relevant issues, in summary, the benefits of the scheme are identified as follows:
- The site is located within a sustainable location
 - The proposal fully utilises the underused and vacant space in this building of merit located within the conservation area
 - There is no objection in principle to the residential use and indeed, this use is considered to be wholly appropriate for such a location
 - The proposal provides housing
- 7.3 The development will make a significant contribution to the local catchment and the wider community. Furthermore, the provision of nine dwellings will contribute towards the housing need within the Borough.
- 7.4 The current use does not fully utilise the space, as is required by the NPPF. The proposal makes good use of surplus ancillary retail space in addition to utilising the unused third floor partially vacant space at second floor, in accordance with policy CP1.
- 7.5 The proposal involves the change of use of the upper floors of the site, and the external appearance will largely remain the same and the character and quality of the Building of Townscape Merit within the Conservation area will remain intact.
- 7.6 In respect to protecting the amenities of the nearby occupiers, the scheme ensures that any impacts resulting from the development are kept to a minimum.
- 7.7 The appellant has demonstrated that the proposal accords with both local and national planning policy. It is upon this basis that the applicant considers that the proposed development is wholly appropriate and accords with the Development Plan material considerations.
- 7.8 The appellant has resubmitted this planning application after withdrawing a similar application made in 2015. This new application addresses all matters raised by the Council and neighbours / related parties relating to affordable housing, unit sizes and numbers, over-looking, bin store / refuse areas

and strategy, cycle storage and car parking. As such the applicant is confident that this proposal provides the very best for this site and this part of the town centre and makes the best use of an underutilised site.

- 7.9 The 'balancing exercise' under the NPPF generally refers to a state of affairs in which development that would otherwise be considered harmful is considered acceptable because it would facilitate (or 'enable') benefits that outweigh that harm.
- 7.10 'On balance' the appellant is confident that the proposal accords with the NPPF insofar that the benefits of the proposal clearly outweigh any associated harm relating to the loss of the vacant and underused space in this location and that the location of cycle stores is outweighed by the provision of 9 new flats in a highly sustainable town centre location on a site which is currently not fully utilised.
- 7.11 For the reasons set out in this statement, planning permission should be granted.

APPENDIX A: Pre Application Response

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Our ref: 15/P0030/PREAPP

Contact: Mr Robert Naylor
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Mr Paul Manning
GL Hearn
280 High Holborn
London

25th March 2015

Dear Mr Manning

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

LOCATION: 29 GEORGE STREET, RICHMOND, TW9 1HY
RE: PRE-APPLICATION ADVICE IN RESPECT TO CHANGE OF USE OF
TWO FLOORS FROM RETAIL (A1) TO RESIDENTIAL WITH NEW
ENCLOSED WALKWAY, RESIDENTIAL ACCESS AND BIN STORE

I write in reference to your pre-application scheme received at the LPA on 3rd February 2015 and our subsequent meeting on Monday 23rd March 2015 at the Council Offices. On the basis of this information I have the following comments to make. Please note that all comments within this letter are made without the benefit of a site visit.

Site Description and History

The application site is a retail unit located on the south side of George Street, Richmond close to the where it meets Lower George Street and adjoining the pedestrian passageway of Church Court. The area is the main thoroughfare through Richmond Town Centre and is located at the end of a terrace of shops. The site is located within the Central Richmond Conservation Area (CA17) and the building has been designated a Building of Townscape Merit (BTM). The surrounding area is commercial in nature and the shop is located in a Key Shopping Frontage.

The most recent and relevant planning history at the site is as follows:

- Advert consent was granted for the non-illuminated delivery, fascia and ATM signage and window vinyls and internally illuminated bus stop signage (Ref: 14/2177/ADV) in August 2014.
- Advert consent was granted for various signs at the Tesco retail unit at 29 George Street, including three externally illuminated projecting signs; three fascia signs formed of individual letters in red and blue acrylic; and seven vinyl films (three including text) to be applied to the front, side and rear windows. (Ref: 11/3571/ADV)
- 11/1935/ADV - Erection of internally illuminated fascia and projecting signs (signs 1, 5, 6, 7 REFUSED) vinyl graphics applied to shopfront windows (signs 8 - 16 REFUSED); high level vinyl panels (signs 3, 4, 20 - APPROVED) and aluminium graphic panels fixed to walls (signs, 17, 18, 19 - APPROVED).

- 08/2952/FUL - Installation of combined heat and power (CHP) unit to provide a sustainable method of powering the store - Application Granted
- 05/1171/ADV - Projecting sign and ground floor window and fascia signage - Application Granted
- 05/1170/FUL - Erection of satellite dish and Air conditioning condenser unit - Application Granted
- 05/0569/ADV - Relocation of externally illuminated projecting sign - Application Granted
- 05/0510/COU - Change of use from A1 retail to A2 of part of first floor and part of ground floor to form new access. Alterations to existing shopfront entrance doors - Application Granted
- 03/1912/FUL - Installation Of Video Rental Dispenser Unit Within Existing Shop Front - Application Refused
- 03/0112/ADV - Erection Of An Externally Illuminated Fascia Sign - Application Granted

Proposal

The proposed development subject to this pre-application query seeks the change of use of 1st, 2nd and 3rd floors from ancillary retail space (A1) to form 9 flats with external alterations and enclosure of walkway at 1st floor, new residential access, bin stores and internal reconfiguration of food store at ground floor and offices at 1st floor.

Relevant Policies

All Core Strategy, Development Management Plan policies and Supplementary Guidance and Documents are available to view on the Council's website www.richmond.gov.uk. Consideration must also be given to policies in the London Plan and National Planning Policy Statements. Relevant local policies are summarised below.

Development Management Plan

- DM SD1 – Sustainable construction
- DM SD2 – Renewable energy and decentralised energy networks
- DM SD6 – Flood Risk
- DM DC1 – Design quality
- DM DC2 – Layout and design of mixed use schemes
- DM DC5 – Neighbourliness, Sunlighting and Daylighting
- DM DC6 – Balconies and upper floor terraces
- DM HO1 – Existing housing
- DM HO2 – Infill Development
- DM HO3 – Backland development
- DM HO4 – Housing mix and standards
- DM HO6 – Delivering affordable housing
- DM TC1 – Larger Town Centres
- DM TC3 – Mixed Use
- DM TC5 – The Evening Economy
- DM TP1 – Matching development to transport capacity
- DM TP2 – Transport and new development
- DM TP6 – Walk and the pedestrian environment
- DM TP7 – Cycling
- DM TP8 – Off street parking – Retention and new provision

Core Strategy

- CP1 – Sustainable development
- CP2 – Reducing Carbon Emissions
- CP5 – Sustainable Travel
- CP7 – Maintaining and Improving the Local Environment
- CP8 – Town and local centres
- CP14 – Housing
- CP15 – Affordable Housing
- CP19 – Local business

Supplementary documents

- Central Richmond Conservation Area Statement
- Central Richmond Conservation Area Study
- SPD Design quality
- SPD Affordable Housing
- Sustainable Construction Checklist
- Residential Development Standards
- Small & Medium Housing Sites - SPD
- Front Garden and Other Off Street Parking Standards - SPD

Professional comments:

The following comments have been made in response to the following submitted material:

- (i) Letter dated 2nd February 2015
- (ii) Pre-Application Drawing Number 3341 000
- (iii) Pre-Application Drawing Number 3341 300 Rev A
- (iv) Pre-Application Drawing Number 3341 301
- (v) Pre-Application Drawing Number 3341 302
- (vi) Pre-Application Drawing Number 3341 303
- (vii) Existing site environment sheet
- (viii) Pre-Application Drawing Number 3341 201 Rev C
- (ix) Pre-Application Drawing Number 3341 110 Rev A
- (x) Pre-Application Drawing Number 3341 100 Rev A
- (xi) Pre-Application Drawing Number 3341 101 Rev C
- (xii) Pre-Application Drawing Number 3341 102 Rev C
- (xiii) Pre-Application Drawing Number 3341 103 Rev B
- (xiv) Pre-Application Drawing Number 3341 107 Rev A
- (xv) Pre-Application Drawing Number 3341 200 Rev B
- (xvi) Pre-Application Drawing Number 3341 202 Rev A

The Council considers that the main issues associated in this particular enquiry relate to the following: (a) principle of residential development; (b) the design of the scheme and impacts on conservation area and BTMs; (c) impacts on residential amenity; (d) traffic and parking issues; (e) sustainability; (f) financial contributions and (g) other matters. These shall be dealt with in turn.

a) Principle of the residential development

Policy CP8 of the Core Strategy 2009 states that the Borough's town and local centres have an important role, providing shops, services, employment opportunities, housing and being a focus for community life. In regard to Richmond Town Centre the key objectives are to maintain and reinforce the centre as the location for major offices, retail (particularly comparison goods and specialist retail) and service uses, arts, culture, and leisure and

tourism facilities. In terms of residential development the objective is to encourage higher density, including affordable and small units; and car free development.

Policy CP14 of the Core Strategy states that the density of residential developments should take in account the need to achieve the maximum intensity of use comparable with the local context, with particular regard to the character, quality and amenity of the established area.

Policy DM TC1 of the DMP 2011 seeks to maintain and improve town centres through the provision of appropriate development within the five identified boundaries. Proposals should contribute to a suitable mix of retail, business, leisure, tourism, community uses, health and residential. Proposals need to enhance vibrancy and vitality of the centre; be more efficient or provide benefit than previous use; reduce need to travel and pressure on parking; in scale to enhance vibrancy and vitality; sites for modern retail needs including where appropriate larger floor-plates; maintain or enhance active frontage; develop leisure, cultural and tourism facilities and respect and enhance heritage and character of centre.

The site is located within a Key Shopping Frontage and thus policy DM TC3 would also need to be considered as any part of a potential application. The policy seeks to controlling changes of use from retail, will generally be resisted.

Richmond is the borough's main shopping centre, being a "major" centre in the London Plan's classification of town centres. The Core Strategy outlines the general location and amount of retail floorspace anticipated to be provided in the borough, and paragraph 6.1.14 indicates that most of the 8,000sqm required is expected to locate in and around Richmond. Richmond remains a relatively healthy town centre according to our latest Town Centre Health Checks and thus there may be room to consider other commercial uses which might also be acceptable.

However, at paragraph 4.2.29 it states that the frontages policy primarily protects the ground floor, street frontage part of a unit. Although the Council will seek to avoid the reduction of overall retail space, especially in Richmond town centre, it acknowledges that retail may not always be the most effective use of the upper floors of certain buildings. Providing that the viability of the ground floor unit to act in a retail capacity is not compromised (especially the case for anchor supermarkets in existing centres), changes of use away from retail on other floors would not be contrary to the frontage policy.

The pre-application query is described as reconfiguring the Tesco store slightly on the ground floor and converting the first, second and third floors to residential. First floor and second floor are described as ancillary office and training rooms and the third floor as vacant space, a void shell with limited access and thus is presumed as ancillary. The Council has previously not objected in principle to the loss of the ancillary space and therefore will take the same approach now.

If the loss of existing uses can be satisfactorily addressed, then the principle of a residential use could in principle be considered in accordance with Policies CP1 and CP14. However, it is essential that any residential could only be considered acceptable provided it does not have any negative impact on the remaining commercial space. Thus further clarification would be required at application stage with particular regard to the ancillary arrangements and the superfluous nature. The proposed ground floor plan does not show much change in layout, and it is presumed the back office will need to go in here. An application would require confirmation of the existing and proposed retail sales area.

In principle additional residential use can add to the vitality and viability in such a town centre location where it is above commercial frontage, in accordance with Policies CP1 and CP14, provided it does not have any negative impact on the ground floor/adjacent commercial uses, such as impact on access and servicing etc. and there is a need to ensure there will not be future conflict given the close juxtaposition with the residential such as from noise, amenity

issues. It appears the proposal includes separate access to the residential and to the other existing commercial uses, which in principle appears to meet the requirements of Policy DM DC2.

The proposed mix is offering 66.7% small (studio or 1 bed) units, which is not reaching the significant proportion expected in a town centre location which should be above 75% as required by Policy CP14 and DM HO4 given this highly sustainable location. Any future application would need to justify the proposed mix, and whether alternative layouts with a higher proportion of small units could be incorporated.

The standards set out in Policy DM HO4 and the Residential Design Standards SPD for external and internal space standards should be addressed to ensure a satisfactory standard of accommodation is proposed wherever possible in a conversion. The internal unit sizes appear to exceed the Council's baseline standards. However it is noted there is limited external amenity space, however there are likely to be constraints with regard to a BTM regarding external alterations such as balconies.

Policy CP14 states that all new homes should be built to Lifetime Homes Standards and 10% to wheelchair standards. Details should be provided in an application of whether some criteria can be addressed, as while on upper floors a lift is not a requirement of the Lifetime Homes Standard and within the constraints of conversion it may be possible to address some criteria.

Policies CP15 and DM HO6 set out the framework to require contributions to affordable housing from all small sites. The Affordable Housing SPD sets out specific contributions sought from converted floorspace on all small sites. However, in light of the Ministerial Statement and recent NPPG update of 28 November 2014, in particular advising that contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development, this Council will no longer seek affordable housing contributions from developments of 10-units or less and which have a maximum combined gross floorspace of no more than 1000sqm.

Nevertheless, any future application would need to justify that the site is not capable of a higher number of units, given concerns above whether there should be a higher proportion of small units and as the unit sizes do exceed by some way the Council's baseline standard. As it is close to the threshold in terms of the number of units proposed, the Council would need to be satisfied the site is not being under-utilised to avoid an affordable housing contribution if it is capable of more units.

b) Design impacts on BTM and the conservation area

Policy CP7 of the Core Strategy seeks to maintain and improve the local environment. Existing buildings and areas in the Borough of recognised high quality and historic interest will be protected from inappropriate development and enhanced sensitively. The policy indicates that any new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued, and that proposals should demonstrate an analysis and understanding of development patterns, features, views, scale and layout of the area.

Policy DM HD1 of the DMP 2011 has a presumption to protect areas of special significance by designating Conservation Areas. Impact of proposals within and affecting the setting of Conservation Area will be taken into account. Features that contribute to character and appearance of the area will be retained, whilst new development should conserve and enhance the character and appearance of the area.

Policy DM HD3 seeks to preserve and enhance Building of Townscape Merit (BTM) by protecting their significance, character and setting. Alterations and extensions should be

based on an accurate understanding of the structure and respect the architectural character and detailing of the original building.

Policy DM DC1 of the DMP 2011 states new development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road and connect with and contribute positively to its surroundings based on a thorough understanding of the site and its context. In assessing design quality this policy requires proposals to have regarded to:

- compatibility with local character including relationship to existing townscape and
- frontages, scale, height, massing, proportions and form
- sustainable development and adaptability, subject to aesthetic considerations
- layout and access
- space between buildings and relationship to the public realm
- detailing and materials

Schemes that are not of a high design quality, and do not result in the improvement of the area where they will be built or implemented, will not be acceptable, nor will schemes which depart from the coherent and predominant character of a road or neighbourhood.

In such locations the character and appearance of an area is the result of many aspects that contribute to its character. The quality of materials, detailing, scale, form and bulk are important elements in any assessment. Consequently one of the main issues in this pre-application request is whether or not the proposal preserves or enhances the conservation area, or at the worst have a neutral effect on such an area. In assessing such an application it is important to look at the character of the conservation area as a whole; the immediate streets and the host property itself.

The Central Richmond conservation area statement (CA17) states the area is mainly a commercial shopping area and the townscape is noteworthy for its variety, with a consistently high quality and many exuberant individual buildings. There are also residential areas of mainly terraced development. The area is threaded by several small lanes leading into the historic Richmond that lie behind the 19th century commercial redevelopment. These lanes, including Church Court provide a refuge from traffic and are spaces of a more intimate nature.

The character and appearance of the immediate surrounding conservation area contains the churchyard enclosure of St. Mary Magdalene Church (grade II listed building) including the Church Walk buildings whose scale relates to the Church, providing contrast to the commercial frontages on the east side of George Street, as does the Green to its west. Whilst the properties are generally plainer and more functional they nevertheless retain a degree of rhythm and character within the immediate area.

The Conservation Area Statement further indicates that one of the key problems and pressures on this area is the loss of traditional architectural features and materials due to unsympathetic alterations. The statement highlights applications should improve and protect the setting and reinstatement of architectural quality and unity. Generally the loss of traditional features and unsympathetic alterations should be avoided and the preservation and enhancement is encouraged within the surrounding area and throughout the Borough. In this particular case the visual impact of the proposed development on the public character of the general area would be extremely exposed, given that the majority of the works are at the rear of the building which are visual from public vantage points and the setting of a listed building.

The conservation team have been consulted as part of the proposed scheme and have raised no issues with the change of use of the upper floors to residential in principle. Given that there would be little in the way of any external changes to the host property. The main external change will mainly be to the Church Court façade incorporating the glazed walkway. This provision would work well with the existing building providing a lightweight feel and still

allowing views through the structure to the existing development. This may be acceptable but the LPA would require further details of materials, fenestration.

c) Impact on residential amenities

Policy DM DC5 seeks to protect residents from unacceptable noise disturbance, loss of privacy, light and visual intrusion potentially generated through development. Light issue is measured through BRE guidelines.

The adopted SPD 'Residential Development Standards states new dwellings which create an unacceptable sense of enclosure or appear overbearing when seen from neighbouring gardens or rooms or from the street will not be permitted. This could be due to the height, footprint or proximity of the proposal.

Policy DM DC6 indicates that purpose built, well designed and positioned balconies or terraces on new residential units can be encouraged. However they need to sufficiently deep to allow adequate access; located next to a dining or living space; receive direct sunlight; designed to provide some shelter and privacy to neighbouring properties; and designed for security and safety. The addition of balconies and upper floor terraces to existing properties will not generally be permitted unless they do not adversely affect neighbourliness.

The adopted SPD 'Residential Development Standards states new dwellings which create an unacceptable sense of enclosure or appear overbearing when seen from neighbouring gardens or rooms or from the street will not be permitted. This could be due to the height, footprint or proximity of the proposal.

Any development must protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. To protect privacy, residential development should be sited a minimum of 20m between the main facing windows of habitable rooms. However, as recognised by the SPD 'Small and medium housing sites', where principal windows face a wall than contains no windows or these are occluded, separation distances can be reduced to 13.5m. Further, with respect to sunlight and daylight (for existing and future residents) the Council is guided by the BRE Site Layout, Planning for Sunlight and Daylight, and in Sun on Ground Indicators. (If applications are forthcoming, please incorporate sunlight / daylight analysis).

In respect to residential amenity it is considered that the proposal is unlikely to create any unacceptable potential increase in overlooking despite the extent of the glazing. Nevertheless the proposal would need to be fully assessed following a full application. However the Council acknowledges that in an urban area there tends to be a degree of common overlooking and that is a normal expectation.

The new units would require the provision private amenity space in accordance with the Councils Residential Development Standards SPD, and these should not be to the detriment of any loss privacy, both actual and perceived from neighbouring properties, although the limitations at the site are noted. The glazed walkway would be extremely visible from public vantage points this may have a visual impact on the amenities of the adjoining properties which is not in accordance with the SPG as a result. Again this would require further assessment should an application be submitted. Also information would be required in respect to the future occupiers and the servicing arrangements of the retail unit on the ground floor to ensure that disturbance is kept to a minimum.

d) Traffic and parking

Policy DM TP2 states that the impact of new development on the transport network will be assessed against other plan policies and transport standards. The policy indicates that it is necessary to consider the impact of any new development on the existing wider and local

transport network for all modes, how it links to the network, impacts on highway safety, the impact of parking and servicing, and with larger developments what provision has been made for the movement and parking of vehicles.

Policy DM TP7 seeks to maintain and improve conditions for cyclists, the Council will ensure that new development or schemes do not adversely impact on the cycling network or cyclists and provide appropriate cycle access and sufficient, secure cycle parking facilities. Policy DM TP8 indicates that developments, redevelopments, conversions and extensions will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.

The Councils Highways Team has been consulted in regard to the details submitted with the pre-application enquiry. They have indicated that the site is located within an area with a PTAL rating of 6a, and is located within a community parking zone. The Transport team have indicated any future application must address parking for the proposed residential units. Parking stress surveys are required if there is no off street parking offered. Parking surveys to the Richmond methodology both overnight and during the day will be required, (scoped with my colleagues in Transport). The Transport team will raise objections if the survey shows the area to be at 90% or more parking stress.

Subject to this being addressed satisfactorily a legal agreement will be required removing access to resident and visitors parking permits and contracts in council run car parks, and also requiring all units must be made members of a car club for 5 years.

Any cycle parking must be enclosed, secure, covered and weatherproof. The current proposed location appears to be within the service yard and is not ideal. The provision should be close to the pedestrian access and the A1 and C3 stores should be separate. At least 9 spaces are required and Sheffield type stands are recommended. This should be shown on any future planning application.

As the residential access is via an existing footpath and from the rear additional lighting may be required. Improvements to the street lighting in the footpath leading from Church Walk to Victoria Place estimated cost £3000.00 to increase public safety for pedestrians at night time which again could be secured through a legal agreement.

Refuse bins must hold 3 x 360 litres refuse and 4 x 240 litres recycling. Residents must not walk further than 30m from unit to store. In addition information would be required on how will the refuse be collected given that it will need to be left within 10m of the public highway for collection, and the Council operatives will not bring the refuse/recycling up from lower ground floors. These will need to be shown on a submitted plan. Also cycle storage must be shown on any submitted application and this will need to be secure and weatherproof.

Furthermore it should be noted that a Construction Management Statement Condition would be attached to the decision should planning permission be granted, given the importance of traffic system within this area and the tight nature of the site itself and the surrounding area.

e) Sustainability

Given that the proposal seeks the refurbishment of an existing building, it is considered that the proposal would generally complement the aims and objectives of the Core Strategy 2009 and Development Management Plan 2011 in providing a more sustainable environment. CP1 of the Core Strategy seeks appropriate uses of land whilst reducing the overall environmental impact, and in particular seeks the refurbishment of buildings rather than the redevelopment.

Policy CP2 states that the Borough will reduce its carbon dioxide emissions by requiring measures that minimise energy consumption in new development and that it will increase the use of renewable energy. These themes are continued in policies DM SD2 and DM SD3 of the

Development Management Plan 2011 stating that development in terms of materials, design, landscaping, standard of construction and operation should include measures capable of mitigating and adapting to climate change to meet future needs.

In particular the retention of existing developments will be supported wherever possible through retrofitting, with conversions encouraged to comply with the Sustainable Construction Checklist SPD and meeting the BREEAM Domestic Refurbishment "excellent" rating. As a result any full application would need to be accompanied by a Sustainable Construction Checklist, to ensure that the proposal meets the relevant sustainable ratings.

f) Financial Contributions (CIL)

As you are aware, the Mayor of London is empowered to charge a Community Infrastructure Levy (CIL) for strategic transport. The Mayor has formally approved a new charge, which takes effect on developments that are granted planning permission on or after 1 April 2012 for the funding of Crossrail. The Mayor is imposing a CIL charge of £50 per square metre in the London Borough of Richmond upon Thames against all but health, education and affordable housing floorspace. CIL will be calculated according to the amount of net additional floorspace a new development will produce, this would include the building of a dwelling even where this is below 100 square metres.

As from the 1st November 2014 the Borough CIL has come into effect, which will require most new development to make a financial contribution towards new or improved facilities required by this borough's development and growing population. These charges will apply to relevant development which is approved after this date. This will operate in conjunction with the revised Planning Obligations SPD and the Affordable Housing SPD; the former also came into effect on the 1st November 2014. For residential development there is a higher and lower band for the CIL (£250 per square metre – higher band and £190 per square metre – lower band) the current proposal would fall within the higher band.

g) Other Matters

- *Community Involvement.*

At this stage neighbours have not been notified of this pre-application enquiry. However, the Council's encourages a statement of community involvement to be submitted with any submission. If you do decide to pursue this scheme, whether in the current or an amended version, prior to submission it is strongly advised that you should consult with neighbours.

Summary

To summarise further work is required to ensure that the site has been optimised in terms of small units and this needs to be satisfied first. Subject to that in principle no housing policy objection to conversion for residential unit in principle, providing assessed to be a satisfactory standard of accommodation and the acceptability of the proposed extension.

Further information should be submitted at application stage in regard to sustainability, construction method statement and impacts on neighbouring amenities. The above must be addressed and a parking survey is required. As such the current scheme would not receive a favourable recommendation, but subject to the above points being addressed and the parking survey results showing stress under 90% with the impact of the development and recently approved applications in the area, a formal application may be acceptable.

Without prejudice

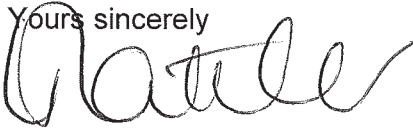
Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give

guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstance may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

In the meanwhile should you have any further concerns or enquiries please do not hesitate in contacting me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Angus', written over the typed name.

Robert Angus
Development Control Manager