

Planning Statement

Lockcorp House, Norcutt Road, Twickenham

Sustainable, Design and Construction SPG, the scheme is required to achieve a 35% carbon reduction target (beyond Part L 2013) as set out in The London Plan Policy 5.2.

Policy 5.13 Sustainable Drainage

6.45 This policy requires new development to utilise sustainable urban drainage systems (SUDS) with an aim to achieve 'greenfield' run-off rates. The London Plan is supported by the Supplementary Planning Guidance: Sustainable Design and Construction, April 2014 which provides further guidance on minimum requirements to achieve the objectives of policy 5.13. In relation to Surface Water Flooding and Sustainable Drainage, the guidance states that developers should design Sustainable Drainage Systems (SuDS) that incorporate attenuation for surface water runoff. The minimum expectation is to achieve 50% attenuation of the undeveloped site's surface water run off at peak times.

6.46 The application is supported by a Flood Risk Statement confirming the application site's location within Flood Zone 1 and therefore at a low probability of flooding. The Site Specific SUDS Strategy prepared by Eight Associates confirms the estimated greenfield run-off rates of the site. With the current proposals for soft-landscaping and brown roof area, plus the pedestrian areas installed with a permeable paving system, the peak run-off rate is calculated to create a positive reduction in run-off rate and volume for the development.

6.47 Furthermore, the scheme will meet the minimum expectations of the GLA Sustainable Design and Construction SPG. The peak rate of run-off for the proposed site will achieve a 50% reduction compared to the pre-developed site and the greenfield peak run-off rates for the development are only 27% greater than greenfield run-off rates, meeting the GLA requirement to ensure run-off is no more than three times greater than greenfield rates.

Policy 6.1 Strategic Approach (Integrating transport and development)

6.48 **Sub-section Aa** requires boroughs to use the parking standards set out in the Parking Addendum Table 6.2 to set maximum car parking standards. The WMS/NPPG also amends national planning policy, set out in the NPPF, in relation to car parking and sets out the Government's concerns relating to the imposition of maximum parking standards.

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- 6.49 New text now to be read alongside paragraph 39 of the NPPF states that local planning authorities should only impose local parking standards for residential and non-residential development, where there is clear and compelling justification that it is necessary to manage their local road network.

Policy 6.3 Assessing Effects of Development on Transport Capacity

- 6.50 **Sub-section A** requires the impact on transport capacity arising from new development to be fully assessed and Sub-section C requires major planning applications to be supported by Transport Assessments in accordance with TFL Best Practice Guidance including travel plans for those applications which exceed the relevant threshold.

Policy 6.9 Cycling

- 6.51 **Sub-section B(a)** requires new development to provide secure, integrated, convenient and accessible cycle parking facilities in accordance with the minimum standards in Table 6.3 and Cycle Design Standards.

Policy 6.13 Parking

- 6.52 **Sub-section C** requires new development to comply with the maximum parking standards set out in the Parking Addendum Table 6.2. In addition, development must provide electrical charging points (1 in 5 spaces) and parking for disabled and cycle parking in line with the parking standards.

- 6.53 **Minor Alterations to London Plan (adopted March 2016)** amended the London Plan parking policy. **Policy 6.13 Parking** the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in Local Plans.

6.54

Table 6.2 permits boroughs to consider higher levels of parking provision as an exception to the maximum standards in outer London areas with low PTAL (generally PTALs 0-1), to address 'overspill' parking pressures. However, Policy 6.13 and Table 6.2 retain maximum parking standards in all other areas, adjusted to allow for variations in public transport accessibility levels. Sub-section E(b) confirms that in locations with high public transport accessibility, car-free development should be promoted (while still providing for disabled people in accordance with London Plan SPG guidance).

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Policy 7.4 Local Character

- 6.55 **Sub-section A** requires new development to have regard to the form, function and structure of an area, **Sub-section B** requires schemes to provide high quality design that responds to key characteristics of the urban grain and **Sub-section C** encourages boroughs to undertake characterisation studies of different areas to define local character.
- 6.56 Richmond Council has not yet prepared a borough-wide characterisation study to define local character of different areas, as recommended by NPPF paragraph 58 and London Plan policy 7.4. In the absence of a borough-wide characterisation study, the Design and Access Statement provides an analysis of the key characteristics of the urban grain, and demonstrating the scheme relates to its existing context, as well as taking the opportunity to improve the quality and character of built form on the site.

Policy 8.2 Planning Obligations

- 6.57 This policy encourages boroughs to address strategic as well as local infrastructure priorities when negotiating planning obligations including affordable housing provision, the funding of Cross Rail and other transport improvements which should be given the highest importance. The application will be subject to CIL Mayoral and Richmond CIL contributions as set out in the CIL form submitted with the planning application.

Richmond upon Thames Local Plan

- 6.58 Richmond's Local Plan comprises a suite of development plan documents (DPDs), the most significant elements relevant to consideration of this application being the Core Strategy and Development Management Plan. The Council is currently reviewing the Local Plan and has undertaken public consultation on the draft Local Plan (Publication). The draft Site Allocations DPD is no longer being progressed and proposed site allocations have been incorporated into the draft Local Plan (Publication).
- 6.59 The following Local Plan policies are particularly relevant to consideration of the application for student accommodation on this site. Weight should be accorded to these policies, subject to their conformity to the NPPF and strategic policy context.

Policy CP14 Housing

- 6.60 **Paragraph 14.A** states that the Council will exceed the minimum strategic dwelling requirement, i.e. the London Plan housing target of 3,150 units between 2015-2025

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where this can be achieved in accordance with other Local Development Framework policies.

6.61 **Paragraph 14.C** states further that residential development proposals will be assessed for the contribution to meeting housing need for all sections of the community. Having regard to the provisions of NPPF paragraph 47, NPPG reference and London Plan Policy 3.8, Paragraph 14.C refers to student housing need as well as conventional residential dwellings.

6.63 **Paragraph 14.D** requires the density of residential proposals to 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. The Design and Access Statement demonstrates how the scheme relates to its existing context, and takes opportunities to improve the quality and character of the local area.

Policy DM HO 5 Housing to Meet Specific Community Needs

6.64 This policy confirms that planning permission will be granted for new accommodation where housing is providing for an identified local need, providing the proposals are on a site and in a location suitable for that particular use, and in accordance with other environmental, transport, parking and other relevant policies.

6.65 **Paragraph 5.1.34** of the supporting text to Policy DM HO5 confirms that current housing priorities include student accommodation to meet the needs of institutions within the borough.

Policy DM EM 2 Retention of Employment

6.66 In accordance with national and strategic planning objectives, Policy DM EM2 confirms that the use of employment land for other purposes will only be permitted where the location has such exceptionally severe site restrictions due to very poor access and servicing arrangements that its continued employment use would be inappropriate.

6.67 The officer's report in respect of the previous permission for affordable housing granted in 2014 confirms that unsuccessful marketing had been undertaken since 2012 and a marketing report had concluded that the poor condition of the existing building and the restricted access were the main issues resulting in lack of interest.

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- 6.68 In May 2013 the Government implemented a change in legislation allowing office (B1 use class) floorspace to be converted to residential (C3 use class) without planning permission through an extension of permitted development rights. Since this change to legislation was introduced 212 prior notification applications have been approved in the borough (up to end April 2015) involving 71,363sqm of office floorspace changed to 865 residential units under PD rights.
- 6.69 However, the loss of employment use on the application site had been accepted previously on the basis of the site's inappropriate location – and not merely on the basis of lack of demand. The officer's report concluded that, due to the restricted access, the site is unsuitable for an alternative employment creating use and as such, the proposals comply with part (c) of DM EM2.
- 6.70 In response to the potential loss of office floor space by permitted development, the Council has published Article 4 Directions for a number of areas in the borough which are deemed to be important employment locations. The application site does not fall within an Article 4 Direction area and from 1st October 2017 will acquire permitted development rights for conversion to residential use (subject to prior notification). Furthermore, a recent survey undertaken by a local agent, Milestone Commercial, confirms the availability of 21,000 sqm vacant office floor space within a 3 mile radius of Teddington (excluding units less than 185sqm), despite the PD rights being available and extended until 2019.

Policy DM DC 1 Design Quality

- 6.71 Consistent with the NPPF, Policy DM DC1 requires new development to 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.
- 6.72 The Design and Access Statement demonstrates that the scheme is based on sustainable design principles and a thorough understanding of the townscape context, and meets the Council's architectural and urban design quality standards.

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Summary

6.73 The scheme complies fully with national planning policy and relevant development policies. The site comprises previously developed brownfield and which constitutes surplus industrial land. The proposed student housing comprises high quality architectural design which would meet an identified local community need for a specific housing priority within the borough. The supporting statements submitted with the application demonstrate that the scheme meets or exceeds all relevant environmental criteria for sustainable development.

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7. SPDs, SPGs AND OTHER RELEVANT PLANNING DOCUMENTS

7.1 Supplementary Planning Documents (SPDs) give additional guidance on some of the policies of the Local Plan and Supplementary Planning Guidance (SPG) gives similar guidance for London Plan policies. SPDs and SPGs do not have the same status as the policies in the development plan but may be taken into account as material considerations in dealing with planning applications.

London Plan Supplementary Planning Guidance

7.2 The following documents provide supplementary policy guidance in support of the development plan. The applicant has had regard to these documents in preparation of the development proposals for the site.

- Housing SPG (March 2016)
- Accessible London: Achieving an inclusive Environment (October 2014)
- Character and Context (June 2014)
- London Planning Statement (May 2014)
- Sustainable Design and Construction (April 2014)
- Use of Planning Obligations in the funding of Crossrail, and the Mayoral CIL (April 2013)
- Mayor's Academic Forum Recommendations 2014

Local Authority Supplementary Planning Documents

7.3 The following documents provide an evidence base for the Local Plan and are also relevant to assessment of development proposals for the site.

- Richmond upon Thames Authority Monitoring Report – Housing (2014-2015);
- London Strategic Housing Land Availability Assessment (2013);
- Strategic Housing Market Assessment (December 2016);
- Assessment of Light industrial and Storage Stock in Richmond upon Thames (June 2016);
- London Borough of Richmond upon Thames, Employment Sites & Premises Study (2016 Update);
- Borough-wide Sustainable Urban Development Study (September 2008).
- Minimum Amenity Standards for Houses in Multiple Occupation

8. KEY PLANNING CONSIDERATIONS

Loss of Employment Use

- 8.1 The site falls within Class B1c (light industrial) use. National planning policy discourages the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The re-provision of surplus employment land in sustainable locations (including sites which are no longer suitable for employment use) to meet other strategic and local planning objectives, is supported by national and local planning policy.
- 8.2 In determining the previous application for residential redevelopment of the application site, the Council confirmed that lack of demand for Lockcorp House related to the poor condition of the existing building and the restricted access of the site. Although marketing for other alternative employment creating uses had not been carried out, the Council accepted that due to the poor access to the site and its relationship to surrounding residential properties, cessation of the employment use would be beneficial and comply with DM EM2 (c).
- 8.3 There has been no material change in circumstances relating to the existing access arrangements and the site's relationship to surrounding residential properties since the previous permission was granted in 2014. As such, these material considerations are still equally applicable to the current application. As previously determined by the Council, the proposed cessation of employment use on the application site would be beneficial to neighbouring residential amenity.
- 8.4 Furthermore, Lockcorp House comprises 230sqm (GIA) and as such, the site will shortly benefit from permitted development rights for change from light industrial use to residential use, subject to prior notification to the local planning authority. The provision of permitted development rights is a material consideration in an assessment of the current proposals for change from employment use to student housing.
- 8.5 The prior notification process includes considerations of highways, contamination and flooding impacts. These matters have been considered previously in respect of the extant permission for residential redevelopment of the site and judged to be acceptable.

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- 8.6 The prior notification process for change of use from light industrial to residential process also includes a criteria on whether the site is in an area 'important for providing industrial services' and whether development would have an adverse impact on the 'sustainability' of the provision of those services in the area of the local authority. Given the Council's previous decision that cessation of the employment use on this site would be beneficial, this criteria could not reasonable provide an impediment to prior approval for residential use.
- 8.7 In summary, the principle of the cessation of employment use on this site has been established by an extant permission. Having regard to forthcoming changes to permitted development rights, the loss of light industrial use on the site accords with national planning policy, which seeks to permit change of use of the property without planning permission.

Principle of the Proposed Use for Student Housing

- 8.8 The strategic and local planning policy contexts seek to promote the redevelopment of previously developed brownfield land to address London's unmet housing need, which includes the strategic and local need for student housing.
- 8.9 Local Plan DM HO5 confirms that permission will be granted for new residential accommodation where housing is meeting an identified local need, providing the site is suitable for that particular use, in terms of environmental, transport, parking and other relevant policy considerations.
- 8.10 The provision of student accommodation to meet the needs of local education institutions within the borough is identified in the adopted Local Plan as a '*current housing priority*'. Both universities located within the borough have substantial unmet need for student accommodation and both institutions have published strategic plans projecting significant increases in student numbers.
- 8.11 National and strategic planning policy encourages local planning authorities to facilitate the provision of dedicated student accommodation to relieve current pressures on the private rented sector and increase the overall housing stock. Student housing is included in the borough's overall housing needs assessment. The London Plan Housing SPG advises that boroughs should not constrain provision of student accommodation which meets strategic as well as local need.

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- 8.12 In accordance with the policy objective of DM EM02 to maximise affordable housing on sites deemed to be unsuitable for continued employment use, permission was granted previously for 100% affordable housing on the application site. However, it has been demonstrated that the extant permission, if implemented, would severely compromise the amenity of existing residential properties, notably Alcott House, and provide sub-standard residential amenity for permanent residential dwellings.
- 8.13 In particular, the provision of shared amenity space between the approved blocks as well as the north facing outlook of some flats with limited separation distance to the railway line would be undesirable for permanent residential accommodation, especially family-sized homes.
- 8.14 Conversely, the proposed student housing provides significant benefits for existing neighbouring residential occupants which would not arise from the affordable housing scheme, as approved. The proposed hall of residence provides:
- (1) a visual and acoustic barrier between Alcott House and the railway line;
 - (2) soft landscaping between the two blocks, including new tree planting;
 - (3) detailed design features to prevent direct overlooking of habitable room windows;
 - (4) reduced car parking provision with increased separation distance between parking spaces and Alcott House; and
 - (5) re-location of the building entrance with recessed porte-cochere, with increase separation distances and minimum noise and disturbance to neighbouring habitable room windows.
- 8.15 In summary, the provision of purpose-built student accommodation is considered to be the most appropriate use for the re-provision of this previously, developed brownfield land. The provision of student housing manifestly accords with the development plan and as such, the presumption in favour of sustainable development applies in relation to the proposed use.

Siting/Layout/Orientation

- 8.16 The proposed siting, layout and orientation of the hall of residence has been informed by the residential and office buildings, as previously approved. In particular, the Site & Comparison Section (DAS page 32) demonstrates that the southern building line and

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separation distance to Alcott House largely reflect the consented scheme for affordable housing. As such, the current proposals provide a greater separation distance to Alcott House than the office scheme.

- 8.17 The proposed northern and western building lines also replicate the affordable housing scheme. Overall, the proposed building footprint is larger than the consented scheme – the building has been extended toward the eastern boundary adjacent to Twickenham grid sub-station, and furthest from habitable room windows in north elevation of Alcott House.
- 8.18 The proposed layout provides an outlook for each communal kitchen/living/dining room which does not provide direct overlooking towards Alcott House. Study/bedroom windows are also orientated to prevent direct overlooking of neighbouring residential windows.
- 8.19 Overall, the siting, layout and orientation of the proposed scheme represents a significant improvement on approved schemes in terms of neighbouring residential amenity, privacy and outlook.

Height and Scale

- 8.20 The proposed hall of residence comprises a four-storey brick-clad building fronting onto Norcutt Road with recessed rainscreen-clad fifth floor incorporating the stair core and lift enclosure. The sections and 3D montages demonstrate that, when viewed from Norcutt Road, the proposed height and scale of development will respect the neighbouring built form.
- 8.22 The Site and Comparison Sections also demonstrate that when viewed from beyond the railway line, the proposed five-storey building height reflects the form and scale of the industrial buildings which in part, define the townscape character in wider views from the MOL to the north of the site.

Bulk and Massing

- 8.23 The surrounding area is characterised by Victorian terraced houses interspersed with substantial industrial buildings providing a variety of architectural forms styles and compositions.

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- 8.24 The scheme provides an innovative architectural form that responds positively to the site constraints and townscape context. The form and massing of the building has been subdivided into a series of modules articulated projecting and recessed elements.
- 8.25 The varied form and architectural character of the locality offers the opportunity for the high quality contemporary composition. The scheme utilises the opportunity to reflect the domestic scale and proportions of neighbouring buildings within an innovative architectural form and design. The building is boldly articulated by projecting canted window bays, recessed porte-cochere, modular fenestration pattern including recessed windows and projecting mullions.
- 8.26 Overall, the scheme provides a high quality design solution as required by national planning policy and local plan design policies.

Residential Standards

- 8.27 The proposed student cluster flats are considered to be houses in multiple occupation (HMOs). The Housing Act 2004 introduced licensing for houses of multiple occupations in England and Wales. Higher education institutions are exempted from licensing providing they sign up to a code of practice that has been approved by the Department for Communities and Local Government (DCLG). The proposed student accommodation will be managed in compliance with the 'Universities UK Code of Practice for University Managed Accommodation'.
- 8.28 Although the National Housing Technical Standards and Richmond upon Thames Minimum Amenity Standards for Houses in Multiple Occupation are not applicable to student accommodation, by way of comparison, the scheme exceeds the minimum requirements for both standards, in terms of room sizes and the provision of washing/sanitary facilities.
- 8.29 An environmental noise and vibration assessment has been undertaken on the application site. Measured noise levels are such that the recommended glazing specifications would be sufficient to ensure that internal noise levels for all residential environments of the development are commensurate to the design range of BS8233:2014.

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- 8.30 Overall, the scheme provides high quality accommodation to meet the specific needs of full-time students.

Residential Amenity

- 8.31 The application site abuts residential properties with habitable room windows facing towards the existing building. The officer's pre-application response highlights potential impact on neighbouring residential amenity arising from increased overlooking and loss of privacy as a result of additional habitable room windows in the development.
- 8.32 The permitted office and residential buildings incorporate windows to habitable rooms facing directly onto the neighbouring residential block. The current proposals incorporate 'blinker' windows with an off-set outlook preventing direct overlooking to the neighbouring residential properties due to their angled orientation relative to the main façade.
- 8.33 Furthermore, the proposed student accommodation seeks to minimise noise and disturbance to neighbouring properties by locating the building entrance as well as ancillary cycle parking and refuse storage facilities close to the eastern boundary of the site.

Student Management Plan

- 8.34 The scheme will be subject to a student management plan to be secured by s106 legal agreement which will ensure the student accommodation is effectively managed. The management plan addresses what measures will be put in place to ensure the best integration of the development within the local community and neighbours. It will also address the tenants' moving in and out procedures, sustainable travel and parking restrictions as well as postal/delivery arrangements.
- 8.35 Students will be required to sign a tenancy agreement regulating their occupation and conduct whilst resident in the property. Serious or persistent breaches of the contractual obligations set out in the tenancy agreement may result in accommodation being terminated.
- 8.36 The Student Management Plan will ensure that future residents behave in an appropriate manner on the premises, but also when leaving or returning to the hall of residence

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(especially late at night). As such, the development will not result in any adverse impact on neighbouring residents in terms of noise or disturbance.

Highways/Parking

- 8.37 The proposed access and service vehicle turning arrangements are as previously approved in 2006 and 2015. The applicant retains ownership of the access road to the site (as shown in blue on the site location plan) and there has been change in material circumstances such that the previously approved access and servicing arrangements would no longer be acceptable and policy compliant.
- 8.38 Local Plan policy DM TP 8 requires applicants to demonstrate that new development provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.
- 8.39 The scheme provides 3 car parking spaces – two ‘tandum’ site management spaces and one disabled space. The Transport Statement prepared by Robert West confirms that the development plan does not include minimum/maximum car or cycle parking standards applicable to student halls of residence.
- 8.40 The Transport Statement confirms the site’s accessibility to a range of public transport services as well as its proximity to Twickenham town centre which provides a wide variety of amenities. The proximity of these local facilities in the surrounding area would be expected to limit the need for car trips (including hire car services) to be generated by the site.
- 8.41 Nevertheless, the applicant would be willing to enter into a section 106 legal undertaking removing eligibility of future students for community parking zone permits, should Norcutt Road be included within a CPZ in the future.
- 8.42 The applicant is also willing to provide a travel plan and student management plan including moving in and out procedures, sustainable travel facilities as well as on-campus postal/delivery arrangements for students.

Sustainability and Renewal Energy

- 8.43 The Energy Statement prepared by Eight Associates demonstrates that the development will reduce carbon emissions by 2.4% from the fabric energy efficiency measures and will

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reduce total carbon emissions by 38% over Building Regulations with the further inclusion of low and zero carbon technologies. As such, the scheme exceeds the policy requirement as set out in the London Plan.

- 8.44 The planning policy requirement is for an Excellent BREEAM rating for this type of development. The scheme achieves a score of 73.7% which equates to an 'Excellent' rating.

Sustainable Urban Drainage

- 8.45 In relation to Sustainable Drainage Systems (SuDS), the scheme incorporates attenuation for surface water runoff. The minimum expectation is to achieve 50% attenuation of the undeveloped site's surface water run off at peak times.

Ecology

- 8.46 The Ecology Report prepared by Biocensus confirms that the site supports a very small range of habitat types that are considered to be of low ecological value. The isolated nature of this site means it is unlikely to support notable invertebrates, small mammals, reptiles or amphibians. The scheme incorporates a range of ecological enhancements to improve the biodiversity value of the site.

CIL/S106 Planning Obligations

- 8.47 Redevelopment of the site will be subject to Local and Mayoral CIL contributions in accordance with the adopted tariffs.
- 8.48 Section 106 planning obligations may only be sought by a local planning authority to mitigate impact of development or make a scheme acceptable in planning. Having regard to the acceptability of the proposed land use, there is no impact arising from the development that would require mitigation by additional financial contributions which would not be addressed by the CIL tariff.

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9. SUMMARY AND CONCLUSIONS

- 9.1 The site comprises previously developed brownfield land in an established urban environment of mixed townscape character. The site is moderately accessible to public transport facilities and lies within easy walking distance of a designated town centre.
- 9.2 Having regard to the site constraints, the historic development and current characteristics of the surrounding urban area as well as the relevant development plan designations, the site is ideally suited to provide purpose-built student accommodation in the form of a managed hall of residence.
- 9.3 The provision of a purpose-built hall of residence on this site would contribute towards the provision of much needed student housing in the borough which is identified in the Local Plan as a 'housing priority' and thereby reduce the current pressure on conventional supply in the rented housing sector.
- 9.4 The scheme has been subjected to a comprehensive pre-application consultation with the local planning authority as recommended by national planning policy. Having regard to the previous planning history, officers have confirmed acceptability of the case for redevelopment for student accommodation and the loss of the existing employment floor space.
- 9.5 The development provides a high quality inclusive, architecturally-designed scheme that is attractive to look at and will enhance the character and visual quality of the locality. It responds innovatively to the site constraints whilst seeking to maximise the appropriate and sustainable form of development.
- 9.6 The proposed development would also improve residential amenity for neighbouring residential dwellings by removing an unneighbourly use and providing a more appropriate relation to existing habitable room windows than the extant permissions.
- 9.7 The application is supported by a number of specialist consultants' reports addressing relevant planning matters including Design & Access, Transport Statement, Sunlight and Daylight, Sustainability Statement and Energy Assessment. As such, the proposed development comprises 'sustainable development' as defined by the NPPF.

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- 9.8 The development will be implemented in accordance with a Construction Management Plan. Furthermore, the proposed hall of residence will be managed through a Student Management Plan to be secured by s106 legal agreement (incorporating a Travel Plan and Delivery Management Plan), and will include measures to ensure the appropriate integration of the future occupiers within the local community.
- 9.9 In accordance with the Town and Country Planning Act (as amended), the scheme demonstrably complies with relevant Development Plan policies and in accordance with the presumption in favour of sustainable development, the application for full planning permission should be considered promptly and favourably.



APPENDIX ONE

Student Halls of Residential within the London Borough of Richmond Upon Thames

LOCATION NO.	NAME	ACCOMMODATION TYPE	STUDENT BEDSPACES
1	De Marillac Hall	SMU managed on-campus hall of residence	180
2	Cashin and Cronin Halls	SMU managed on-campus hall of residence	90
3	Clive Halls	SMU managed on-campus hall of residence	40
4	Davidson House	Fresh Student Living hall of residence	87 (30 dedicated SMU)
5	Graham Wiseman and Doyle Halls	SMU managed on-campus hall of residence	115
6	Old House	SMU managed on-campus hall of residence	93
7	Waldegrave Park Houses	SMU managed street properties	129
8	16 Strawberry Hill Road	SMU managed street property	18
9	Benedict XVI House	Lay community managed street property	10
		SUB TOTAL	762
10	Lower Cottage, Richmond	RAIU managed off-campus property	4
11	Main Building, Richmond	RAIU managed on-campus hall of residence	193
12	Red House, Richmond	RAIU managed on-campus shared house	11
13	Longley House, Richmond	RAIU managed on-campus shared house	5
14	Montford House, Richmond	RAIU managed off-campus property	38
15	Parkview, Richmond	RAIU managed off-campus property	31
		SUB TOTAL	282
16	Atlantic House, Kensington	RAIU managed on-campus hall of residence	115
17	Collingham Gardens, Kensington	RAIU managed street property	19
18	Courtfield Gardens, Kensington	Studio Let managed hall of residence	73
19	Ambassador House, Kensington	RAIU managed on-campus hall of residence	60
		SUB TOTAL	267
		TOTAL	1,311

Note: Data based on student accommodation information published by St Mary's University and Richmond, The American International University (February 2017)

APPENDIX TWO

DRAFT SPECIFICATION FOR STUDENT MANAGEMENT PLAN

LOCKCORP HOUSE, NORCUTT ROAD, TWICKENHAM

1. Introduction
2. Approach to Managing Student Accommodation
3. National Code of Standards
4. Site Management
5. Management of Communal Facilities
6. Maintenance of External Areas
7. Out of Hours Emergency Management
8. Additional Security
9. Working with the Local Community
10. Moving in/out Process
11. Code of Conduct
12. Management of Health and Safety
13. Waste Disposal
14. Student Travel Plan
15. Sustainability

APPENDIX THREE

Draft Heads of Terms

These Heads of terms are set out on behalf of Lockcorp Limited to inform the preparation and negotiation of a S106 agreement with the London Borough of Richmond upon Thames in respect of planning obligations relating to proposals for the redevelopment of Lockcorp House, Norcutt Road to provide student accommodation.

These Heads of Terms are submitted as part of the application on a 'without prejudice' basis and are subject to the receipt of formal consultation responses and confirmation by the local planning authority that the obligations satisfy the requirements of Regulation 122 of the Community Infrastructure Levy Regulations 2010 (NPPF paragraph 204). This requires that planning obligations set out in a section 106 agreement must be:

- i) necessary to make the development acceptable in planning terms;
- ii) directly related to the development; and
- iii) fairly and reasonably related in scale and kind to the development.

It is envisaged that discussions relating to these obligations and the Section 106 Agreement will continue with the local planning authority during the application process and may be amended prior to determination.

On the basis of the Development Plan and the information available at the time of submission of the planning application; it is envisaged that the section 106 agreement may include the obligations set out below.

The draft Heads of Terms are subject to committee resolution to grant planning permission and the completion of a Section 106 Agreement. In such circumstances, Lockcorp Limited will enter into planning obligations to secure the following:

1. Student Management Agreement including delivery and drop off restrictions, and noise agreement, to be made available to residents on request;
2. Sustainable Travel Plan;
3. Removal of resident's eligibility to apply for parking permits.

APPENDIX FOUR

SMU report	comparable space (sq.ft.)	agent
3 WATER LANE Richmond	12809	MR
34-36 Hill Rise Richmond	2917	MR
15 Saint George's Road Richmond	3014	MR
Worton Road Isleworth, TW7	13200	MR
NUCLEUS RICHMOND TW9	2840	MR
CONQUEST HOUSE, KINGSTON	20683	Cattaneo
KINGSMILL BUSINESS PARK	9056	Cattaneo
EDEN STREET KINGSTON	16524	Cattaneo
1 PARK ROAD, TEDDINGTON	12160	Cattaneo
REGAL HOUSE TW1	4896	MC
HIND COURT, 106—114 LONDON ROAD	14371	Cattaneo
13 CASTLE MEWS, HAMPTON	4450	Cattaneo
THE FACTORY, 2 ACRE ROAD	2378	Cattaneo
MANORGATE HOUSE KT1	4054	Cattaneo
PEREGRINE HOUSE, RICHMOND, TW9 1SE	7229	MC
HORACE ROAD, KINGSTON	2548	MC
15 Saint George's Road Richmond	3014	MR
1 WALDEGRAVE ROAD, TEDDINGTON	2830	Snellers
1 KING STREET, TWICKENHAM	2400	MC
2ND FLOOR, DOME BUILDINGS	2350	MC
3RD FLOOR, WESTMINSTER HOUSE	4176	MC
5-7 KINGSTON HILL	2700	MC
London Rd TW1	2853	Snellers
94-102 HIGH STREET, HAMPTON HILL	5326	Snellers
NEVILLE HOUSE, 55 EDEN STREET	2027	MC
PARKSHOT HOUSE, 5 KEW ROAD	3600	MC
South Avenue Kew	2485	MC
25-29 HIGH STREET, KINGSTON	2800	Cattaneo
18 PETERSHAM ROAD, RICHMOND	7400	Cattaneo
1 STATION ROAD, HAMPTON WICK	2900	MC
UNIT 11, THE FACTORY, KINGSTON	2378	cattaneo
CANBURY BUSINESS PARK, KINGSTON	2500	cattaneo
60 Marina Place Hampton Wick	15594	Cattaeneo
Wellington House, Hampton Hill	2300	Milestone
UK Hosue TW1	2335	Milestone
49-53 York St	7630	Avison Young
161 High St Hampton Hill	13500	Snellers

TOTAL

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