

2.2

PLANNING POLICY

Planning Policy

The proposals have been designed to meet the relevant national, regional and local planning policies and guidance. Key policies outlined in the formal pre-application letter are shown and listed on the following pages with explanation of how the scheme responds to ones specifically singled out in the response letter.

NATIONAL POLICY

NATIONAL PLANNING POLICY FRAMEWORK (2012)

DCLG 'Technical Housing Standards' - nationally described space standard (2015)

Requiring Good Design

In terms of promoting good design, paragraph 58 of the National Planning Policy Framework should be consulted.

- It states that the development:
- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- Respond to local character and history, and reflect the identity of local

REGIONAL POLICY

THE LONDON PLAN (2015)

Policy 3.5 Quality and design of housing developments

Strategic

- A Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment

Planning decisions and LDF preparation

- The design of all new housing developments should enhance

the quality of local places

- LDFs should incorporate requirements for accessibility and adaptability, minimum space standards, and water efficiency
- Development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan
- The Mayor will provide guidance on implementation of this policy that is relevant to all tenures

Response : The scheme has been designed to provide high quality internal and external environments, and enhance the quality of the Barnes High Street. Consultation with the conservation and design officers at the Local Planning Authority has been sought at the earliest of design stages to ensure this is the case.

Policy 5.2 Minimising Carbon Dioxide emissions

Planning decisions

- Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
 1. Be lean: use less energy
 2. Be clean: supply energy efficiently
 3. Be green: use renewable energy
- The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings.
- Major development proposals should include a detailed energy assessment to demonstrate reduced carbon dioxide emissions
- As a minimum, energy assessments should include the following details: calculation of the energy demand and carbon dioxide emissions covered by Building Regulations, proposals to reduce carbon dioxide emissions through design, proposals to further reduce carbon dioxide emissions through the use of decentralised energy where feasible, proposals to further reduce carbon dioxide emissions through the use of on-site renewable energy technologies.
- The carbon dioxide reduction targets should be met on-site.

Response : The scheme has been designed reduce carbon emissions. An Energy Strategy and BREEAM Assessment accompany the application to demonstrate proposed improvements.

Policy 6.13 Parking

Strategic

- The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking
- The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

- The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be the basis for considering planning applications
- In addition, developments in all parts of London must:
 1. Ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
 2. Provide parking for disabled people in line with Table 6.2
 3. Meet the minimum cycle parking standards set out in Table 6.3
 4. Provide for the needs of businesses for delivery and servicing.

LDF preparation

- The maximum standards in the Parking Addendum should be used to set standards in DPDs.
- In locations with high public transport accessibility, car-free developments should be promoted
- In town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to parking
- Outer London boroughs should demonstrate that they have actively considered more generous standards for housing development in areas with low PTAL

Response : Given the quantum of units on site and proximity to the town centre, no additional private parking permits are

proposed on site. A Transport Statement accompanies the full application outlining the strategy in more detail.

LOCAL POLICY

CORE STRATEGY (2009)

CP1 Sustainable Development

- 1.A The policy seeks to maximise the effective use of resources including land, water and energy, and assist in reducing any long term adverse environmental impacts of development.
- The following principles will be promoted:-
- 1.B Appropriate location of land uses
- 1.C Making best use of land
- 1.D Reducing environmental impact
- 1.E Environmental gain to compensate for any environmental cost of development will be sought.

Response : The proposal maximises effective use of land on a site that is already has mixed use. By refurbishing and extending, the existing building's environmental impact will be reduced to meet planning policy.

CP2 Reducing Carbon Emissions

CP3 Climate Change - Adapting to the Effects

CPS Sustainable Travel

CP7 Maintaining and Improving the Local Environment

CP14 Housing

CP15 Affordable Housing

CP19 Local Business

DEVELOPMENT MANAGEMENT PLAN (2011)

DM SD 1 Sustainable Construction

DM SD 2 Renewable Energy and Decentralised Energy Networks

DM SD 4 Adapting to Higher Temperatures and Need for Cooling

DM SD 9 Protecting Water Resources and Infrastructure

2.2

PLANNING POLICY [CONTINUED]

DM HO 4 Housing Mix and Standards

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. Development must take account of accessible design as required by Policy CP14.

Response : As the proposal is located in a town centre, a high proportion of smaller units are proposed. The internal space standards comply with London Plan guidance.

DM HO 6 Delivering Affordable Housing

DM TP 2 Transport and New Development

DM TP 8 Off Street Parking

DM DC 1 Design Quality

Design Quality

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*

Response : The scheme has been designed to provide high quality internal and external environments, and enhance the quality of the Barnes High Street. Consultation with the conservation and design officers at the Local Planning Authority has been sought at the earliest of design stages to ensure this is the case. Details of strategies implemented are shown in this report.

DM DC 5 Neighbourliness, Sunlighting and Daylighting

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.

Response : The proposal seeks to minimise impact on neighbouring properties in a number of ways outlined in this report. Main measures include, building on the existing building lines, locating windows in existing positions, using obscured glass to windows under 20m facing distance to habitable rooms and analysing the impact on neighbouring windows in a Daylight/Sunlight Report submitted as part of the full application.

DM HD 1 Conservation Areas

DM HD 2 Listed Buildings

DM HD 3 Buildings of Townscape Merit

PUBLICATION LOCAL PLAN (2016)

LP1 Local Character and Design Quality

LP2 Building Heights

LP3 Designated Heritage Assets

LP5 Views and Vistas

LP8 Amenity and Living Conditions

LP10 Local Environmental Impacts, Pollution and Land Contamination

LP20 Climate Change Adaptation

LP21 Flood Risk and Sustainable Drainage

LP22 Sustainable Design and Construction

LP24 Waste Management

LP34 New Housing

A. The Borough's target is 3,150 homes for the period 2015-2025.

This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.

B. The following amounts of housing are indicative ranges in these broad areas of the borough to 2025:

Area	Wards	Approx. No of units
Richmond	Ham, Petersham and Richmond Riverside; South Richmond; North Richmond; Kew	1000-1050
Twickenham	Twickenham Riverside; St Margarets and North Twickenham; South Twickenham; West Twickenham	1000-1050
Teddington and the Hamptons	Hampton North; Hampton; Fulwell and Hampton Hill; Teddington; Hampton Wick	650-700
East Sheen	East Sheen; Mortlake and Barnes Common; Barnes	400-500
Whitton	Whitton; Heathfield	100

Response : The proposal seeks to provide the additional new homes for the borough as outlined the indicative range for East Sheen as outlined above (400-600 new homes by 2025)

LP35 Housing Mix and Standards

LP36 Affordable Housing

LP39 Infill, Backland and Backgarden Development

LP45 Parking Standards and Servicing

SUPPLEMENTARY PLANNING DOCUMENTS (SPDS)

'Housing Extensions and External Alterations' (2015)

'Design Quality' (2006)

'Residential Development Standards' (2010)

'Sustainable Construction Checklist' (2011)

'Affordable Housing' (2014)

'Refuse and Recycling Storage Requirements' (2015)

'Small and Medium Housing' (2006)

Response : The proposal has been designed with reference and guidance to the SPG documents listed above. Specific reference is to the 'Housing and External Alterations' (2015) SPG to ensure that the massing to the rear of the development appears 'subordinate' to the main mass, avoiding visual confusion and ensuring the extension is integrated with the overall development. This is detailed later on in this report.

2.3

CONSULTATION

PRE-APPLICATION MEETING / RESPONSE

The scheme was first presented to the local authority planning officers at a pre-application advice meeting on the 31st January 2017.

Following this meeting a series of conversations were held with the Local Planning Authority regarding the proposals.

The formal response letter displayed on the following pages responds to the scheme presented to the conservation, design and case officers. Key points are highlighted in yellow.

Following this letter, the scheme has been revised to ensure that the application meets the requirements set out by the officers.

Main Changes to the design in response to the officer's comments are:

- **Unit type and mix:** The application is formed of more smaller units and less family sized to meet policy.
- **Space Standards:** All units are designed to comply with nationally described space standards and the London Housing Design Guide.
- **Natural Daylight:** Windows have been added to all habitable rooms, with the majority of bathrooms receiving natural daylight.
- **Volume of rear:** The application has been revised to follow the existing building line. The roof line has been reduced on the extension and the eaves line is a constant datum to existing properties. Further detail on the massing and volume is shown in this report.

- **Impact on neighbouring Daylight/Sunlight:** A daylight / sunlight report accompanies the application demonstrating the minimal impact on neighbouring daylight and sunlight.
- **Refuse collection:** This is detailed in the 'Access' section of this report.
- **Sustainability:** A BREEAM Domestic Refurbishment Scheme and Energy Report accompany the application.
- **Flood Risk:** A flood risk assessment accompanies the application

SUMMARY

We believe that this application successfully responds to and resolves the issues and comments received by the Local Planning Authority at both the Pre-application Meeting and the formal response letter shown on the following pages.

Environment Directorate

Civic Centre, 44 York Street, Twickenham TW1 3BZ
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Mr Craig Shanley
Architecture Initiative
John Prince's Street
London
W1G 0JL

Please contact: Lucia Sarisska
Email: lucia.sarisska@richmond.gov.uk
Tel: 020 8891 1411
Date: 5th April 2017

Dear Mr Shanley,

Site: TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
67-69 BARNES HIGH STREET, BARNES, LONDON, SW13 9LD
Proposal: PARTIAL DEMOLITION, REFURBISHMENT AND EXTENSION TO THE EXISTING PROPERTIES TO CONVERT FROM 2 X A2 UNITS AND 3 X RESIDENTIAL UNITS INTO 2 X A2 UNITS AND 6 X RESIDENTIAL UNITS.

I write in reference to your application.

Site Description

The application relates to existing buildings with two A2 shops on ground floor level to the front and residential use at ground floor level to the rear, at first and second floor level. The site is not locally listed but is located within Barnes Green Conservation Area, Character Area Village Planning area, Mixed Use Area, Protected View Area and Floodzone 2 and 3 area. The site has secondary shop frontages and is under Article 4 Directives (restrictions to conversion of A1 use to A3 use under 'permitted development').

Planning History

There is an extensive planning history related affected properties at no. 67, 67A, 67B, 68A, 68 and 69 Barnes High Street which is available on the Council's website for viewing.

However, the most relevant application and pre-application listed is as follows:

15/2131/FUL Addition of another floor to the main front core of the building to form a three storey unit with additional accommodation to the upper floors.
Status: refused permission 09-Jul-2015

Reasons for refusal:

'The alteration from a gabled roof to a shallow pitched hipped roof and the overall scale, mass, and inappropriate and out of character design of the proposed extension would be detrimental to the character, appearance and setting of the host building, the adjacent Grade II Listed Building at no. 70 Barnes High Street, the wider street scene and Conservation Area. The proposal would therefore be contrary to the aims and objectives of the National Planning Policy Framework and the

development plan, including policy CP7 of the Core Strategy (adopted 2009) and policies DMDC1, DMHD2 and DMHD1 of the Development Management Plan (adopted 2011).'

14/P0257/PREAPP Redevelopment of upper floors and rear extension (Case closed).

Proposal

Partial demolition, refurbishment and extension to existing properties to convert existing 2 x A2 units and 3 x residential units into 2 x A2 units and 6 x residential units.

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:

National Planning Policy Framework (2012)

DCLG 'Technical Housing Standards' – nationally described space standard (2015)

The London Plan (2015)

Policy 3.5 Quality and design of housing developments
Policy 5.2 Minimising Carbon Dioxide emissions
Policy 6.13 Parking

Core Strategy (2009)

CP1 Sustainable Development
CP2 Reducing Carbon Emissions
CP3 Climate Change - Adapting to the Effects
CP5 Sustainable Travel
CP7 Maintaining and Improving the Local Environment
CP14 Housing
CP15 Affordable Housing
CP19 Local Business

Development Management Plan (2011)

DM SD 1 Sustainable Construction
DM SD 2 Renewable Energy and Decentralised Energy Networks
DM SD 4 Adapting to Higher Temperatures and Need for Cooling
DM SD 9 Protecting Water Resources and Infrastructure
DM HO 4 Housing Mix and Standards
DM HO 6 Delivering Affordable Housing
DM TP 2 Transport and New Development
DM TP 8 Off Street Parking
DM DC 1 Design Quality
DM DC 5 Neighbourliness, Sunlighting and Daylighting
DM HD 1 Conservation Areas
DM HD 2 Listed Buildings
DM HD 3 Buildings of Townscape Merit

Publication Local Plan (December 2016)

LP1 Local Character and Design Quality
LP2 Building Heights
LP3 Designated Heritage Assets
LP5 Views and Vistas
LP8 Amenity and Living Conditions
LP10 Local Environmental Impacts, Pollution and Land Contamination
LP20 Climate Change Adaptation

LP21 Flood Risk and Sustainable Drainage
LP22 Sustainable Design and Construction
LP24 Waste Management
LP34 New Housing
LP35 Housing Mix and Standards
LP36 Affordable Housing
LP39 Infill, Backland and Backgarden Development
LP45 Parking Standards and Servicing

Supplementary Planning Documents (SPDs)

'House Extensions and External Alterations' (2015)
'Design Quality' (2006)
'Residential Development Standards' (2010)
'Sustainable Construction Checklist' (2011)
'Affordable Housing' (2014)
'Front Garden and Other Off Street Parking Standards' (2006)
'Refuse and Recycling Storage Requirements' (2015)
'Small and Medium Housing' (2006)
'Revised Lifetime Home Standards' (2010)

Planning Considerations

The key planning issues for consideration include the impact of the proposed development on the character, appearance and setting of the host site, adjacent listed building and surrounding Conservation Area and neighbouring amenities, environmental impact, the impact on parking provision, the impact on housing and retail provision, and housing standards issues.

RETAIL

There are no significant changes proposed to existing A2 floorspace. Given there is no change in use on ground floor level, there are no concerns in terms of loss of existing commercial space. Additionally, there is a separate access proposed to residential units. This would accord with policy LP1 and DM DC2 which state that the mix use schemes are supported as long as conflict between uses and users are minimised.

NEW HOUSING

There is no in-principal objection to the provision of additional residential units in this sustainable location. The proposed residential units would be located above and to the rear of the commercial floorspace and in mixed use area, therefore there would be no objection to proposed additional residential units which would bring vitality and viability to the area and would be in compliance with policies LP34, CP1 and CP14.

However, there is a concern about the proposed dwelling mix. Policy DMHO4 states that development should generally provide family size accommodation outside of town centres and the housing mix should be appropriate to the location. A similar approach is in the Local Plan where policy LP35 seeks family sized accommodation outside of town centres and Areas of Mixed Use. This site is within an Area of Mixed Use and the proposed residential is to the rear and above commercial use. There are only 3 small (1 bed and studio) units proposed which is not the significant proportion of small units expected. The Council is also concerned at the introduction of family townhouses (3 x 2-bedroom units) which can accommodate small size families. This is due to lack of amenity space required for families. In the light of above, the applicant would need to demonstrate that alternative layouts with a higher proportion of smaller units cannot be accommodated.

RESIDENTIAL STANDARDS