

From 1st October 2015 all new housing would be expected to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and the Council has been applying the nationally described space standard. The nationally described space standards set a minimum gross internal floor area of 39sqm for a 1 bed 1 person one storey dwelling, 50sqm for a 1 bed 2 person one storey dwelling, 61sqm for a 2 bed 3 person one storey dwelling and 70sqm for a 2bed 3 person two storey dwelling. There is no equivalent standard for a 2 bed3 person three storey dwelling.

It is not clear from the submitted documents whether the proposed residential units would meet the minimum space standards, however **there is a requirement to comply with the above details to avoid any overdevelopment of the site.** Additionally, any area with **headroom of less than 1.5m would not be counted within the Gross Internal Area unless used solely for storage.** The Council strongly encourages a minimum ceiling height of 2.5m for at least 75% of the gross internal area to address overheating and ensure appropriate ventilation and daylight. **There are some habitable rooms and bathrooms proposed without any windows.** The above needs to be addressed in order to provide a satisfactory standard of accommodation for future occupiers.

Moreover, the requirements of policies LP35 and DM HO4 and the SPD 'Residential Development Standards' (2010) is to supply an external amenity space for future occupiers, especially for occupiers of the proposed family size units and a minimum of total private space of 40sqm for 2 beds should be provided. The plans suggest very small areas of amenity to the front of both townhouses which is not acceptable as it is preferred for the family unit to have an access to a sufficient size private garden. The Council suggests reconsidering of this significant shortfall of the external amenity space for the proposed family residential units.

Considering the size of the remaining smaller units, the units are less likely to be occupied by families and **future occupiers may not expect provision of external amenity space to the rear and above of the commercial floorspace.** If balconies or terraces cannot be designed into the scheme due to **other constraints such as overlooking, it would be useful to clarify this in any submission.**

Since 1 October 2015 all new housing would be expected to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings'. **The optional Building Regulation M4 (2) cannot be fully applied to conversions and change of use proposals consequently; the applicant is expected to meet the standards that can be met.** Moreover, the optional Building Regulations M4 (2) also require step free access which could be applicable to some units only. **The applicant is required to clarify in an application the standards that can be met.**

## DESIGN

There is no objection to proposed front of the new building and new shopfronts. The height, style and finishes of the new building to the front have **been found acceptable in design terms,** and even though the building is not of a traditional character, there are rendered 2-storey high properties with mansard roofs in immediate or surrounding area. **The frontage of the building does appear to be sympathetic to the setting of the adjacent listed Rose House and it would have minimal adverse impact on the character and appearance on the streetscene.**

However, there is still **concern with regards to additional volume to the rear of the property,** especially on upper floors. The property to the rear would be larger than the existing footprint and envelope and with minimal setbacks and overall height, massing and scale would have a detrimental impact on the setting of the adjacent listed building and properties at Swan Place and character of the surrounding Conservation Area to the rear.

In the light of above, the proposed alterations and additions to the rear would lead to overdevelopment of the site and the proposal would be considered an intensive, excessive and over scaled, it would fail to provide 'subserving' addition to existing building and due to its scale it would appear overbearing and out of keeping with the character and appearance of the surrounding area. Seaforth Lodge next door should not set the precedence as each property is assessed on their own individual merits.

## AMENITY

Without visiting the site and detailed documents, it is difficult to access any impact of the proposed development on the adjacent neighbouring occupiers. However, the applicant is required to make **sure that the scheme would have no adverse impact on the adjacent occupiers in loss of daylight/sunlight and loss of privacy terms** and would be in accordance with policy DM DC5 of the Development Management Plan (2011) and SPDs 'Residential Development Standards' (2010) and 'House Extensions and External Alterations' (2015).

Given the height, depth, form, mass, infill and proximity of the proposed building to the rear, there is a **concern that the proposal would be visually intrusive and overbearing when viewed from Rose House, properties on Swan Place to the rear of the site and Seaforth Lodge.**

For example, it is noted that the increase in bulk at the rear of the site would be approx. just 9m on the upper floors from facing windows at Seaforth Lodge. At ground floor level, the development would be approx. 7m from Seaforth Lodge side elevation windows. The extension would be approx. 11m from the front elevation of 1 Swan Place.

The proximity to neighbouring residents combined with the scale of the extensions are considered likely to be detrimental to residential amenity, although this would need to be confirmed by a site visit at the planning application stage. In the light of above, it is crucial to address any impact on the adjacent occupiers before any other parts of proposal are designed.

## TRANSPORT AND PARKING

The site does not have the benefit of an off-street parking and there is a CPZ in the vicinity from which the future residents will be exempt. Under S106, access to resident/visitor parking permits for 4 flats (and membership of car club for first occupiers of all units for 5 years) will be restricted and allow 1 resident permit only (no visitor permits) each for 2 flats. This will be secured by a legal document on a later stage.

The applicant is required to provide 6 cycle spaces by introducing Sheffield stands within the enclosed, secured and weatherproof storage which needs to be separate from the commercial cycle storage and proposed refuse storages.

There were no details of refuse and recycling receptacles submitted to the Council and commercial storage must be separate from residential storage (please show both on plans). Residential refuse storage is required to be within 20m of Barnes High Street and the width of the passageway must allow for the collection of the receptacles. **Additionally, the applicant is required to clarify how the refuse and recycling will be collected by the waste collector.**

A draft Construction Method Statement is required to be submitted as part of any formal application due to proximity of the site to pedestrian crossing signals.

## SUSTAINABILITY

The applicant is required to demonstrate that new residential units would reduce adverse environmental impact by using resources efficiently. The application must conform to the Sustainable Construction Checklist and submit the document to the Council with any application and together with **BREEAM Domestic Refurbishment Scheme and Energy Report** in order to demonstrate that the development would achieve water efficiency by meeting the target for water consumption which is 105 litres per person per day. Moreover, the development should include measures capable of mitigating and adapting to climate change (materials, design, landscaping, standard of construction and operation); new homes are required to achieve a minimum 35% reduction in carbon dioxide emissions beyond Building Regulations 2013.

## FLOOD RISK

Given the site is located in Floodzone 2 and 3, there is a requirement for the applicant to carry out a

Flood Risk Assessment, and submit it as part of the planning application. Please see policy LP21 for more details.

#### AFFORDABLE HOUSING CONTRIBUTION

Following a report to the Council's Cabinet on 23 June 2016 (item 10 on the Local Plan Pre-Publication Version), the adoption and use of the Pre-Publication Local Plan Affordable Housing policy LP 36 has been agreed for determining planning applications and development management purposes. The policy, set out in Appendix 1 to the Cabinet Report, continues to seek affordable housing contributions from all sites, based on the Council's local circumstances as set out in the Cabinet report (see paragraphs 3.15 to 3.19).

The commuted sum can be calculated using the pro-forma Annex A to the SPD 'Affordable Housing' (2014). The onus is on applicants to submit the proforma at Annex A along with any supporting information, with an application. However, if the applicant decides to challenge the viability of affordable housing contribution, **a Viability Report needs to be submitted** with the planning application. This may require independent assessment at the expense of the applicant.

#### COMMUNITY INFRASTRUCTURE LEVY (CIL)

The following development types will be liable to pay CIL:

- Development comprising 100 square metres or more of gross new build internal floor space;
- Development of less than 100 square metres of gross new build internal floor space that results in the creation of one or more dwellings.

Based on the above, the proposed scheme will be CIL liable and more information on CIL can be found here [www.richmond.gov.uk/community\\_infrastructure\\_levy](http://www.richmond.gov.uk/community_infrastructure_levy)

#### OTHER

Given the scale of the rear extension proposed and potential impacts on neighbouring residents the Local Planning Authority would recommend that the applicant engage in pre-application consultation with the adjacent properties. It would be beneficial if the applicants efforts in this regard are reported within a Statement of Community Involvement to accompany any future planning application. Whilst this is not a validation requirement, it is strongly encouraged.

#### SUMMARY

There is no principal objection to proposed retail and residential units; however the applicant is required to **justify lack of smaller residential units and address internal and external space standards**. The proposed design to the front of the property has been found acceptable, however the rear of the building has been found harmful due to its bulk, mass, height, style and overdevelopment and assessment of impact on the adjacent occupiers is required to be carried out. Additionally, it is required to address the current transport issues and to demonstrate the compliance with environmental, floor risk and affordable housing contribution policies.

#### 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 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.

Yours sincerely,



Mr Robert Angus  
Development Control Manager  
London Borough of Richmond Upon Thames



CGI visualisation of the kitchen/living/dining area of the proposed ground floor flat.

# 3.0

# DESIGN PROPOSALS

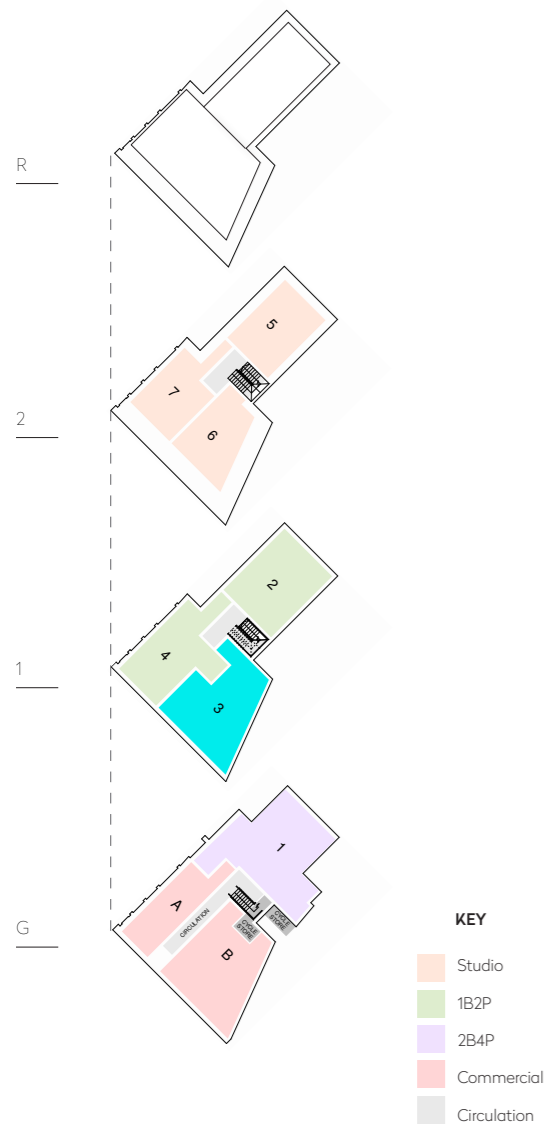
## SUMMARY

The following section outlines and details the application. The strategy for the development of the site can be summarised in the following key elements :

1. Partial demolishing of the rear 'extension' elements and existing pitched roof.
2. Continue the urban grain/pattern that currently exists along Barnes High Street, ensuring that the proposal matches the height of eaves and ridge of existing buildings and neighbouring properties roofs to tie development into the surroundings.
3. Sensitive respond to conservation area context and adjacent listed building.
4. Partial refurbishment of the existing accommodation at ground and first floors to provide high quality living accommodation.
5. Construct extension increasing the number of residential units, therefore providing additional homes for the Borough.
6. Create a communal entrance to units accessed off Barnes High Street giving clarity to residential entrances.
7. Improve the sustainable credentials of the existing properties on site.
8. Enhance the appearance and character of the area with sympathetic materials and detailing.

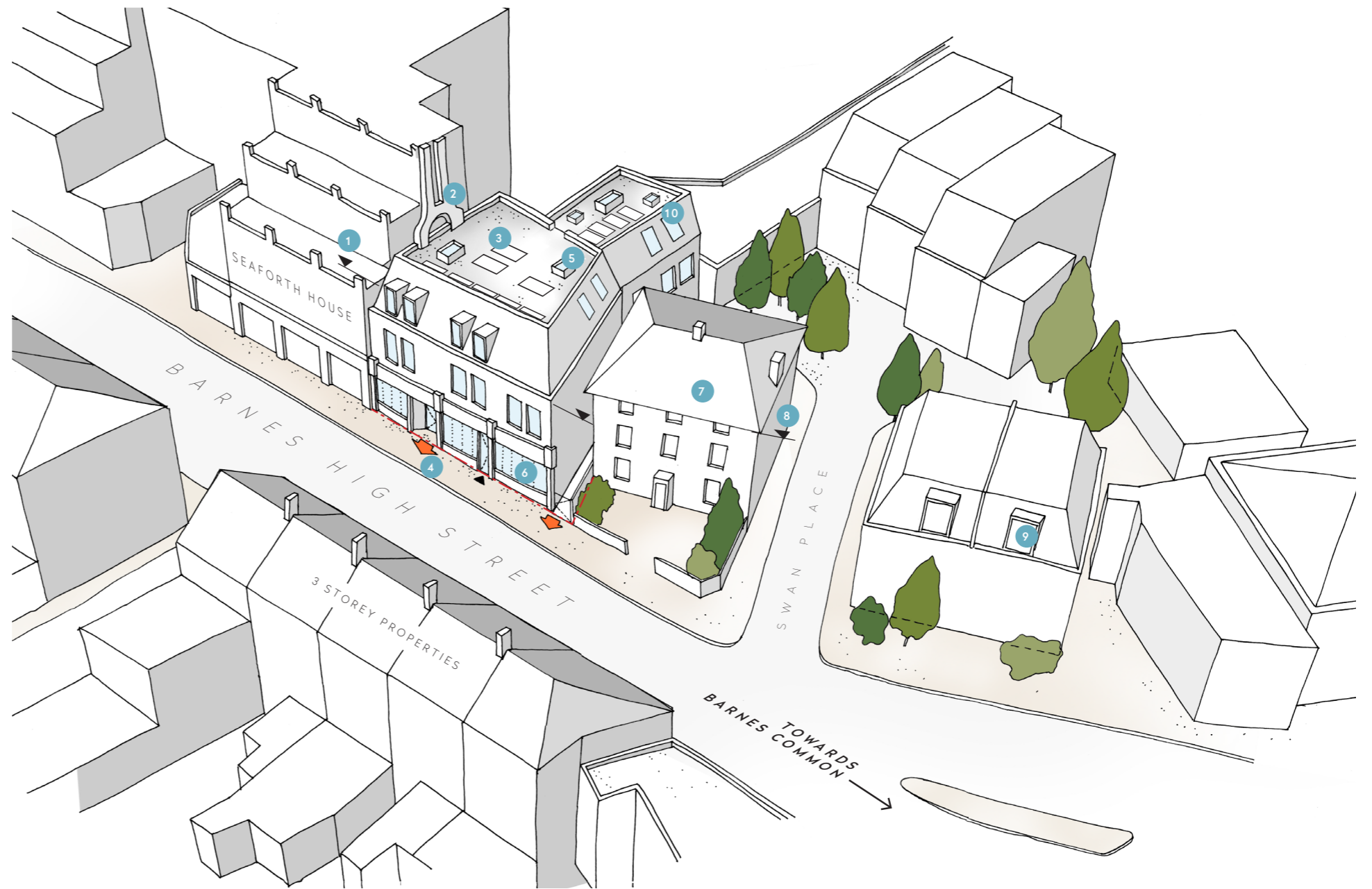
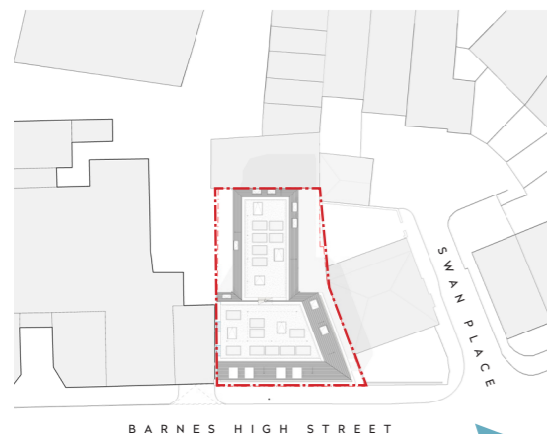
### 3.1

## CONCEPT + USE



- KEY**
- Studio
  - 1B2P
  - 2B4P
  - Commercial
  - Circulation

**KEY PLAN**



### INITIAL CONCEPT

The main concept is to rationalise, improve and increase the existing accommodation at 67-69 Barnes High Street whilst sensitively responding to the adjacent neighbouring properties by matching datum heights, materiality and architectural features (such as dormer windows) evident in the local area.

The drawing above is the initial concept drawing produced demonstrating how the proposal ties into the local area.

### KEY

- 1** Dormer window datum to match height of second floor windows on the neighbouring property (Seaforth House).
- 2** Existing traditionally detailed brick chimney stack retained
- 3** Photovoltaic panels to improve sustainability credentials
- 4** Main residential entrance to communal access stair
- 5** Roof-lights providing second floor flats with natural daylight
- 6** Commercial units and shop frontage to Barnes High Street to be retained and refurbished
- 7** 70 Barnes High Street. A 3 storey Grade II listed 'Rose House' sits directly adjacent to the site.
- 8** Eaves height of neighbouring property to be matched by the parapet height of the proposal
- 9** Dormer windows prevalent along Barnes High Street allow the second floor (third storey) to be used for accommodation
- 10** New build extension to appear subordinate to the main massing with a reduced ridge height but a consistent eaves datum to meet the guidance set out in the SPG 'House Extensions and External Alterations' (2015)