

Planning Department  
London Borough of Richmond upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

Ref: JL/KS/31

**BY E-MAIL**

09 October 2017

Dear Sir or Madam,

**PRIOR NOTIFICATION FORM – CLASS P (PNJ): PART 3, SCHEDULE 2**  
**RE 1A ST LEONARD ROAD, LONDON, SW14 7LY**

This letter is submitted to the London Borough of Richmond upon Thames, on behalf T J Simmons and Co Limited, in support of a change of use proposal at 1A St Leonard Road, London, SW14 7LY.

This application (under Schedule 2, Part 3, Class P of the Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015 (GDPO)), seeks prior notification for development consisting of a change of use of a building and any land within its curtilage to use falling with Class C3 (Dwelling Houses) of the Schedule to the Use Class Order from a use falling within Class B8 (Warehouse and Distribution) of that schedule following the dismissed appeal, Appeal Ref: APP/L5810/W/17/3169320 .

The change of use from Use Class B8 (Warehouse and Distribution) to C3 (Dwelling Houses) is subject to the condition that before beginning the development, the Developer shall apply to the London Borough of Richmond upon Thames for a determination as to whether the prior approval of the authority will be required as to the:

- i. Impacts of air quality on the intended occupiers of the development
- ii. Transport and highways impacts of the development
- iii. Contamination risks in relation to the building
- iv. Flooding risks in relation to the building
- v. Noise impacts of the development
- vi. Where the authority considers the building to which the development relates is located in an area that is important for providing storage or distribution services or industrial services or a mix of those services, whether the introduction of, or an increase in, a residential use of premises in the area would have an adverse impact on the sustainability of the provision of those service

This letter should be read in conjunction with following documents (in no particular order):

- Completed Application Form (including CIL) prepared by CREATE Design Ltd.
- Air Quality Assessment prepared by RPS Group
- Flood Risk Report prepared by prepared by RPS Group
- Phase 1: Environmental Risk Assessment prepared by RPS Group
- Noise Report prepared by Sharps Redmore
- Transport Statement including Outline Construction Logistics Plan prepared by Paul Mew Associates
- Design and Access Statement prepared by CREATE Design
- The Town and Country Planning (General Permitted Development (England) Order 2015 (No. 596)
- Signed Unilateral Undertaking between the London Borough of Richmond Upon Thames and Cedar River Developments Ltd.
- Drawings (Existing and Proposed) prepared by CREATE Design:
  - 390\_ B10P01 - Existing Site Plan [02.08.16]
  - 390\_ B20P00 - Existing Ground Floor [06.07.16]
  - 390\_ B20P01 - Existing First Floor [06.07.16]
  - 390\_ P20P00 - Proposed Ground Floor [06.07.16]
  - 390\_ P20P01 - Proposed First Floor [06.07.16]

In support of this Application:

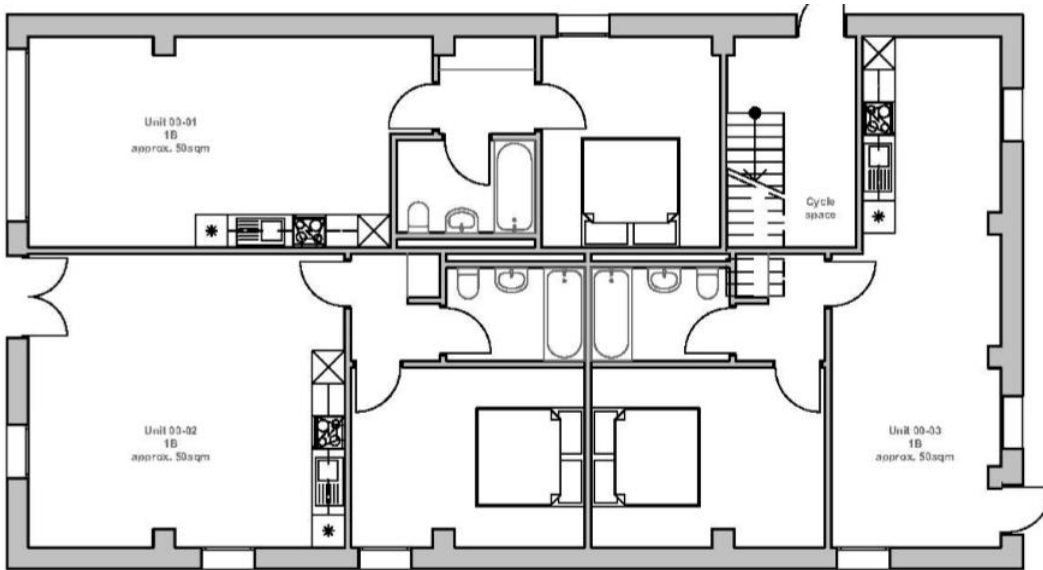
## 1. DEVELOPER'S CONTACT DETAILS

T J Simmons and Co Limited  
1A St Leonard Road, London, SW14 7LY

## 2. WRITTEN DESCRIPTION OF THE PROPOSED DEVELOPMENT

The proposed works comprise the conversion of the unit from B8 (Warehouse and Distribution) to 6x one bed flats (C3) within the boundary. There are no changes to the external areas of the site as part of the proposed works.

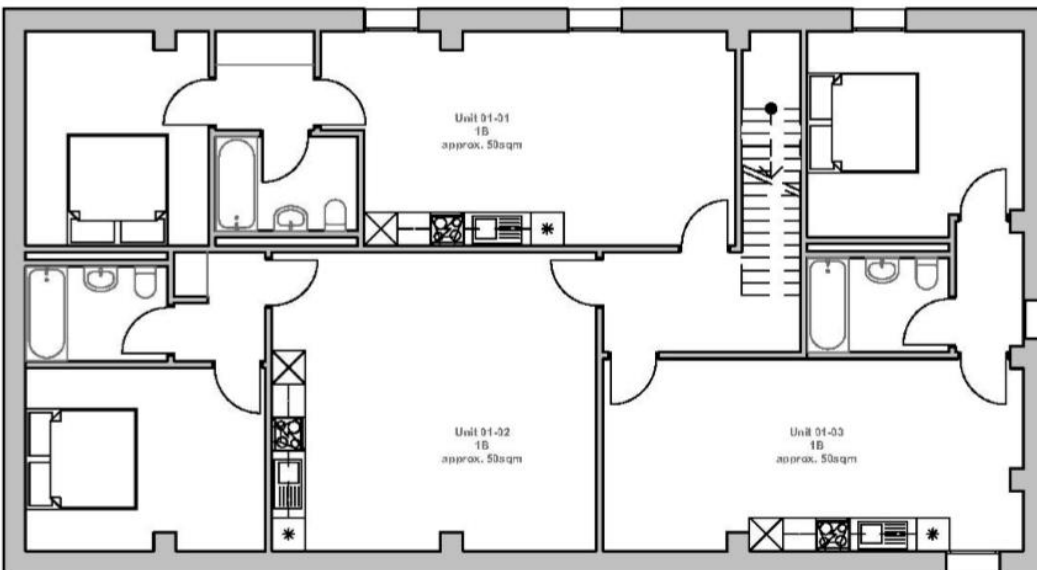
Dwg No. 390 P20P00 - Proposed Ground Floor [06.07.16]



Gross Internal Area (GIA) = 167 square metres (sq.m)

It is proposed to develop 3x one bed units of 50 sq.m GIA each.

Dwg No. 390 P20P01 - Proposed First Floor [06.07.16]



Gross Internal Area (GIA) = 167 square metres (sq.m)

It is proposed to develop 3x one bed units of 50 sq.m GIA each.

Please refer to the supporting Transport Statement prepared by Paul Mew Associates. Existing pedestrian and cycle access from Saint Leonard Road will be kept and improved. No car parking exists on site, therefore, it is proposed that no car spaces will be provided with the proposed development, and for this reason it is considered to be a car free development. Six cycle parking spaces are proposed (one for each unit). Refuse spaces are proposed according to the Council's refuse strategy.

Our proposals would make a positive contribution to the existing area by providing residential units with appropriate refuse, cycle parking spaces and access and transport strategy.

### 3. DETAIL / PLAN OF SITE & DEVELOPMENT

#### i. Description

Please refer to the supporting Design and Access Statement prepared by CREATE Design.

The site occupies an area of approximately 0.02 hectares. It is currently occupied by a warehouse (B8) with ancillary office space on the first floor. There are hardstanding concrete and pavement areas around the building.

The property was constructed following planning permission granted in 1982 (82/316) and is a simple sheet-metal shed.

##### Site Photograph



##### Dwg No. 390 B10P01 - Existing Site Plan [02.08.16]



#### ii. Context

The surroundings are made up of a mix of uses and styles, but is predominantly residential use. The building is located within a private commercial parking and servicing yard in an Area of Mixed Use. There are flats nearby.

##### Aerial Photographs of the Site & Surrounding Area





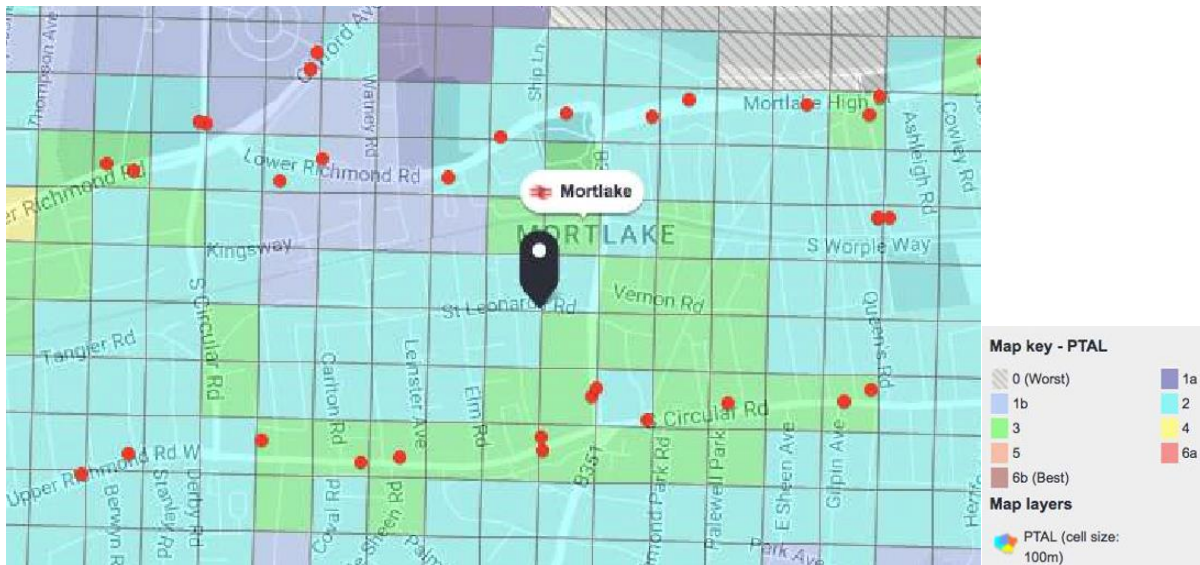
## Transport & Accessibility

Please refer to the supporting Transport Statement including Outline Construction Logistics Plan prepared by Paul Mew Associates.

The unit is located down an access driveway off the south side of St Leonards road, close to the junction with Sheen Lane, and adjoins a parking / loading area servicing other nearby business premises.

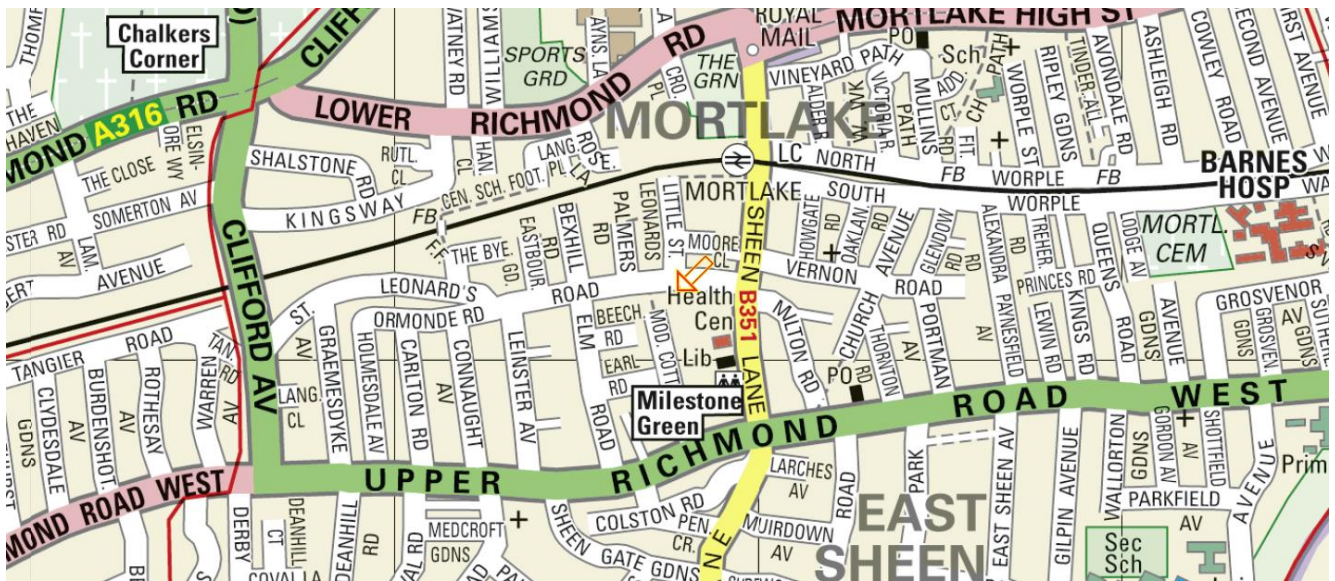
The site is located within the London Borough of Richmond upon Thames 'East Sheen' controlled parking zone which restricts parking between 10am to 12pm Monday–Friday. A map extract of the local parking zone is shown in Appendix D of the supporting Transport Statement.

### TfL Planning Information Database: WebCAT (Public Transport Accessibility Level (PTAL))



With the level of public transport services detailed above, the site has been found to have a PTAL rating of 3 which is classed as 'moderate'. It should be noted that the pre-application advice incorrectly assigned the site a PTAL of 2, while the TfL WebCAT assessment fails to include bus route 209 and overestimates the distance from the site to Mortlake Station but still affords the site a PTAL of 3. Full details of the PTAL assessment are shown in Appendix D of the supporting Transport Statement.

### Street Map



A total of 7 bus routes including 2 which operate on a night bus / 24-hour basis can be accessed from bus stops within the PTAL prescribed distance of 640m as summarised in Table 1 below.

Rail services are available from Mortlake National Rail station which is located 195m to the south of the site. Mortlake station provides access to services operated by Southwest Trains with typical off-peak weekday frequencies providing 8 trains per hour to London Waterloo, 4 of which run direct via Clapham Junction, 2 run via Richmond, Kingston and Wimbledon and 2 run via Richmond and Hounslow.

In terms of pedestrian facilities in the area, footways are generally of a high standard, are level / trip free. Local roads provide a combination of dropped kerbs, tactile paving and kerb buildouts to aid pedestrian and wheelchair crossing. There are pedestrian crossing facilities provided on Sheen Lane south of its junction with Vernon Road as part of the signalised junction of Sheen Lane and Upper Richmond Road.

The amenities in proximity to the site include local convenience stores, hardware / DIY stores, public houses, retail outlets, and restaurants on Sheen Lane.

Table 1. Local Bus Services

Bus Stop Name & Distance from Site	Route	Destinations Served	Peak Hour * Frequency	Operational Hours
The Green, Mortlake (445m)	419	Richmond, Lower Richmond Road, Mortlake, Barnes, Suffolk Road, Howsman Road, Hammersmith	4	06:03 to 00:16
	N22	Fulwell, Twickenham, Richmond, Lower Richmond Road, Mortlake, Barnes, Putney Common, Putney Bridge, Parsons Green, Chelsea, Hyde Park Corner, Piccadilly Circus	2	23:59 to 05:58
Sheen Lane, East Sheen (251m)	33	Fulwell, Teddington, Twickenham, Richmond, East Sheen, Barnes Common, Hammersmith	7.5	24 Hour Service
	493	Richmond, East Sheen, Roehampton, Putney Heath, Southfields, Wimbledon, Plough Lane, Blackshaw Road, Tooting St George's Hospital	5	05:21 to 00:46
	337	Richmond, East Sheen, Barnes Common, Putney, Wandsworth, Clapham Junction	5	05:34 to 00:24
Avondale Rd Bus Station (640m)	209	Mortlake, Barnes, Castelnau, Hammersmith	13.3	05:00 to 00:50
Pig & Whistle, Sheen Lane (140m)	969	Whitton Gladstone Avenue, Roehampton Vale / Asda		1 per day Tues & Fri

Source: Transport for London

\* Number of services per direction during period 0815-0915 except for Routes 969 & N22.

## Heritage Assets

The site is not designated within a conservation area and the unit, itself, is not statutorily or locally listed (e.g. Building of Townscape Merit).

## Environmental Settings

### Air Quality

Please refer to the supporting Air Quality Assessment prepared by RPS Group.

The entire borough is designated as an Air Quality Management Area (AQMA) due to elevated concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) attributable to road traffic emissions.

### Contamination

Please refer to the supporting Phase 1 Environmental Risk Assessment prepared by RPS Group.

The site comprised undeveloped land from c.1869 to c.1913 when two small unspecified structures were developed on site. The site was redeveloped to comprise two unspecified buildings (likely commercial / light industrial) by 1933. The current site layout comprising a warehouse building was developed c.1987.

Surrounding land uses comprised predominantly residential properties and undeveloped land from the late 1890s until the 1950s. By c.1951 a Cosmetic Works (1951 to recent) was located 10m west (currently a warehouse utilised for storage by an events company), a Garage (1951 to 1965) was located 20m northeast, a Furnishing Works (1951 to 2002) was located 75m north and an Engineering Works (1951 to recent) was located 90m southeast of the site. Further commercial and industrial land uses were developed from 100m of the site in the 1950s.

The site is located in a mixed residential and commercial area. RPS has been advised that the site is proposed to be converted for a residential end use. Future site users are considered to be potentially sensitive receptors to contamination (if present) beneath the site, however the sensitivity of future residents will be reduced by the absence of soft landscaped areas / residential gardens.

The site overlies a Secondary A Aquifer relating to the Kempton Park Gravel deposits which are further underlain by Unproductive Stratum relating to the London Clay Formation. Further Secondary A Aquifers relating to the Lambeth Group Formation and Thanet Sand Formation are located below the Clay and a Principal Aquifer relating to the Chalk Group is located at depth. The site is not located within a groundwater Source Protection Zone and no potable groundwater abstractions are located within 2km of the site.



The nearest surface water feature is a culvert located 250m north of the site. The River Thames, located 500m north of the site, is classified as 'good' chemical quality. Given their distance from the site the surface water features are not considered to be vulnerable receptors.

Overall, the site is within a low to moderate sensitivity setting and is proposed for a sensitive end use.

## Flood Risk

Please refer to the supporting Flood Risk Assessment prepared by RPS.

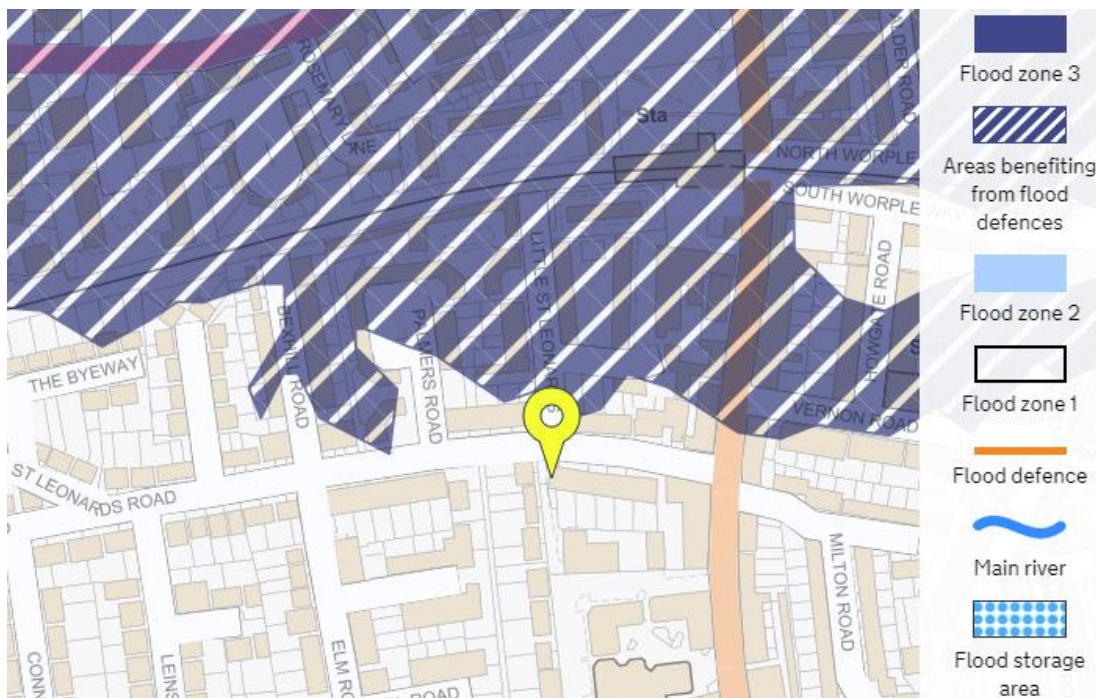
The nearest main watercourse is the River Thames, approximately 540m north of the site.

There is a culverted watercourse approximately 250m northwest of the site

The Environment Agency (EA) flood map (available online) indicates that the site is located within Flood Zone 1. The annual probability of flooding from fluvial / tidal sources is classified as less than 1 in 1000. The site is approximately 80m south of the floodplain associated with the River Thames.

The EA Risk of Flooding from Surface Water map indicates that the site itself is at 'very low' risk from surface water flooding which means the site has an annual probability of flooding of less than 1 in 1000. The hardstanding areas surrounding the site are at 'low' risk from surface water flooding. This corresponds with an annual probability of flooding that is between 1 in 1000 and 1 in 100.

### Environment Agency (EA) Flood Risk Map



## Planning History

A planning history search of the site has been undertaken by making use of the online property search engine on the Council's website.

Application Number	Status	Proposal
98/0712	granted permission 21/08/1998	Change Of Use Of Prefabricated Building From Storage/packaging Use To Scout Hall.
82/0316	granted permission 19/11/1982	Demolition of existing buildings and erection of a prefabricated building for storage/packaging use...

Plan No.	Particulars	Applicant	Council's Decision	APPEAL	Date
7241a	Continued use of building as store.	Chambon Ltd.	Ext. to 31.12.60.		13.11.57.
7241b	Continued use of covered yard for packaging Government stores.	Albion Packaging Co.	Temp app. to 31.12.65.		14.9.60.

Plan No.	Particulars	Applicant	Council's Decision	APPEAL	Date
5883	Erection of lean-to shed.	H. Constantine	Temp to 31.12.48. Sec. 53		10.9.47.
5833a	Continued use of store shed.	Chambon Ltd.	Temp to 31.12.50. Sec. 53.		9.2.49.
6616	Continued use of store for storing a machine.	H. G. Constantine.	Temp to 31.12.52.		14.2.50.
6758	Use of premises for pre-packing for various government departments.	Albion Packaging Co.	APP.		14.6.51.
7241	Continued use of building as store.	H. Constantine	Temp to 31.12.55. Sec. 53		11.2.53.
7847	Cover in yard for storage, inspection and package of Government stores.	Albion Packaging Co.	Approved for 5 years.		15.6.55.
8002	Erection of industrial buildings.	A.R. Gray.	Approved until 31/12/60		11.1.56.

#### 4. APPLICATION FEE

Please find attached cheque in the sum of £80.00, made payable to the London Borough of Richmond upon Thames, in respect of the Application Fee.

#### 5. PLANNING POLICY FRAMEWORK

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, when determining a planning application, regard is to be given to the Development Plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

##### i. National

Department for Communities and Local Government (Published)

- National Planning Policy Framework 2012 (NPPF)
- National Planning Policy Guidance 2014 (NPPG)

##### ii. Regional

Greater London Authority (Published)

- The London Plan: Spatial Development Strategy for London Consolidated with Alterations Since 2011 (March 2016)

##### iii. Local

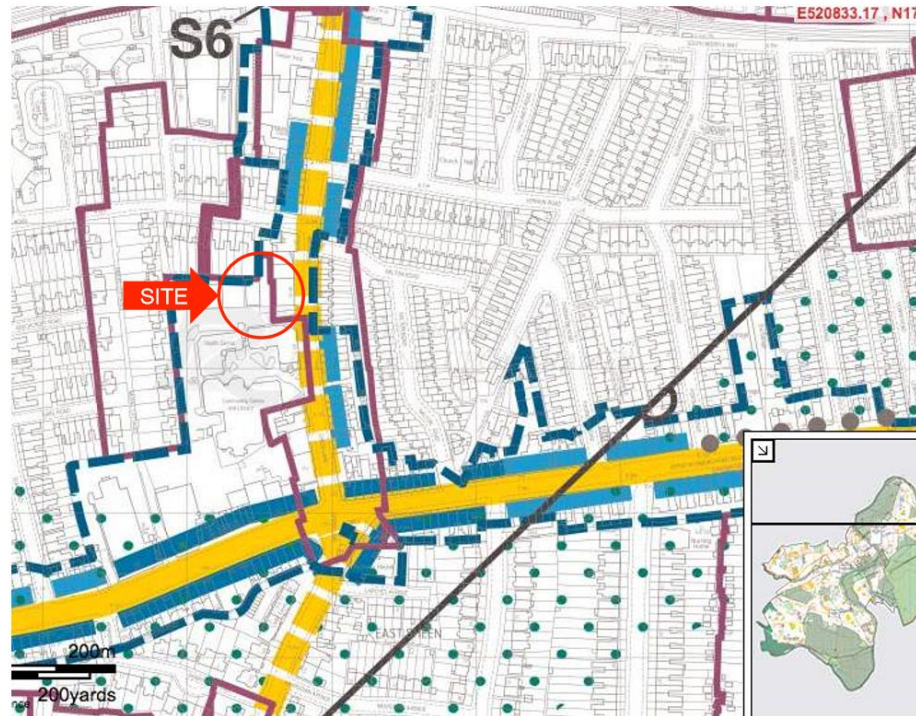
London Borough of Richmond upon Thames (Adopted)

Plans/documents	Status
<a href="#">Core Strategy</a>	Adopted April 2009. Please also refer to the <a href="#">Local Plan Review</a>
<a href="#">Development Management Plan</a>	Adopted November 2011. Please also refer to the <a href="#">Local Plan Review</a>

Online Proposals Map

To the right is an extract of the Council's proposal map showing that the site is not in the green belt and not in a conservation area.

-  Green belt  
DM 05.1 National Policy
-  Major Development Site in Green Belt  
DM 05.1 National Policy
-  Metropolitan Open Land  
DM 05.2
-  Other Open Land of Townscape Importance  
DM 05.3
-  Historic Parks & Gardens  
DM 05.4
-  Public Open Space  
DM 05.5
-  Area jointly provided with Public Open Space  
DM 05.6
-  Thames Policy Area  
Policy Number
-  Site of Special Scientific Interest  
CE 4
-  Other Site of Nature Importance  
CE 4
-  River Catchment Area of Opportunity  
CE 2
-  Town Centre Boundary  
DM 10.1
-  Tackledown Area Action plan boundary  
TDM 1.1, TDM 2, TDM 3, TDM 4
-  Key shopping frontage (see Appendix 3 of DM 10.2)
-  Secondary shopping frontage (see Appendix 3 of DM 10.2)
-  Frontages subject to specific restrictions  
DM 10.3
-  Conservation Area (as at July 2013)  
DM 10.4
-  Scheduled Ancient Monument  
DM 10.2
-  Viasubmark  
DM 10.7
-  View  
DM 10.7
-  Proposed area for tree planting  
DM 10.4
-  Primary or Secondary road
-  Local distributor road / Green road
-  Borough boundary
-  Area at risk from flooding  
Please check with the Environment Agency at [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)



**iv. Emerging Development Plan**

London Borough of Richmond upon Thames (Adopted)

The Council is currently preparing a new Local Plan for the borough, which will replace the existing policies within the Core Strategy and Development Management Plan. The Plan will set out policies and guidance for the development of the borough over the next 15 years.

Activity	Date
Consultation on scope of review of policies and draft site allocations	4 January to 1 February 2016
First consultation on the draft Local Plan (Pre-publication)	8 July to 19 August 2016
Second consultation on the draft Local Plan (Publication) that the Council intends to submit to Secretary of State	4 January to 15 February 2017
Submission of the draft Local Plan to the Secretary of State	Friday 19 May 2017
Independent Examination in Public	Autumn/Winter 2017/2018
Adoption of the Local Plan	Spring 2018

**6. ASSESSMENT OF IMPACTS**

A previous application was dismissed at Appeal because of the lack of a binding agreement detailing a mechanism to control car parking, therefore, this application seeks to replace that which was dismissed in July of this year.



The change of use from Use Class B8 (Warehouse and Distribution) to C3 (Dwelling Houses) is subject to the condition that before beginning the development, the Developer shall apply to the London Borough of Richmond upon Thames for a determination as to whether the prior approval of the authority will be required as to:

## **i. Impacts of Air Quality on the Intended Occupiers of the Development**

Please refer to the supporting Air Quality Assessment prepared by RPS Group.

The entire borough is designated as an Air Quality Management Area (AQMA) due to elevated concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) attributable to road traffic emissions.

In undertaking this assessment, RPS experts have exercised professional skills and judgement to the best of their abilities and have given professional opinions that are objective, reliable and backed with scientific rigour. These professional responsibilities are in accordance with the code of professional conduct set by the Institution of Environmental Sciences for members of the Institute of Air Quality Management (IAQM).

No substantive demolition or construction works are proposed; additional windows are proposed to maximise interior light. As such, dust impacts during construction are highly unlikely. During the operational phase, the development is unlikely to generate significant traffic movements compared with the existing site use.

As such, this assessment focuses on whether the site is suitable for residential development in relation to the traffic-related pollutants, NO<sub>2</sub> and PM<sub>10</sub>. The results of air quality monitoring in the vicinity of the proposed development have been reviewed and indicative calculations have been undertaken to derive the likely pollutant concentrations at the façades of the proposed residential dwellings. Pollutant concentrations are expected to be well within the relevant health-based air quality objectives at the façades of proposed receptors. Therefore, air quality is acceptable at the development site, making it suitable for its proposed uses.

The proposed development does not, in air quality terms, conflict with national or local policies, or with measures set out in the LBRT's Air Quality Action Plan. There are no constraints to the development in the context of air quality.

In light of the above, the change use will have no impact in terms of air quality on the future occupants, and the proposal complies fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class P.

## **ii. Transport & Highways Impacts of the Development**

Please refer to the supporting Transport Statement including Outline Construction Logistics Plan prepared by Paul Mew Associates.

Pre-application advice relating to a previous version of the scheme was provided by the Council in February 2014. This included a number of highways / transport issues as set out below:

- Parking with the pre-application advice setting out that the development must avoid creating an unacceptable impact on on-street parking and local traffic conditions
- Pedestrian access to the site citing potential conflict between vehicles and pedestrians on the shared access route
- Refuse store location and transfer distances
- Servicing strategy and related swept path analysis
- Cycle storage provision

A copy of the pre-application advice is shown in Appendix C of the supporting Transport Statement.

The development site is located in an area of moderate public transport accessibility with a range of local bus and rail connections. In addition, the local pedestrian and cycle environment is good with level footways and sufficient pedestrian crossing facilities to aid movement between the site and local public transport access points and signed on-road cycleways. In addition, there are multiple local car-club vehicles and controlled parking zone regulations in place. As such the proposed 'car-free' status of the development is considered to be acceptable, and was also deemed acceptable by the inspector for the Appeal case when the inspector noted; "*As there are opportunities to conveniently access to public transport, the future occupiers of the proposed flats would not, therefore, necessarily be dependent on private cars to meet transport requirements*".

The development being car free would have no significant impact on local traffic levels. Sustainable trip generation would be accommodated by existing local provision without detrimental impact.

No on-site parking provision will be made. The development will however provide on-site cycle parking, a marked pedestrian route while still providing sufficient space for service vehicle access, maneuvering and egress.

The main issues for the Appeal were the “*effect of the proposed development on car parking and highway safety*” and “*whether the proposed development would provide safe and suitable access to the development for pedestrians.*”. It was found by the inspector, that the proposed development would provide a safe and suitable access for the development, but due to the mechanism to control car parking in connection with the proposed development, it would cause harm to highway safety in the vicinity of the site, thus being contrary to policy DM TP8.

In response to the responses raised by both the Inspector and the Council, a signed Unilateral Undertaking has been signed which solves the issues raised by the inspector. The Unilateral Undertaking states that the future occupiers of the development will not be allowed to hold a parking permit for the area. Prior to the first occupation of any residential unit details will be made available of a car club provider, and within a month of the first occupier one member of each unit will be required to have a membership for the car club at his/ her own expense.

A Construction Logistics Plan will be implemented to manage construction activity and traffic.

In light of the above, the change use will have no impact in terms of transport, and the proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class P, following the unilateral undertaking signed by both the applicant and the Council.

### iii. Contamination Risks in Relation to the Building

Please refer to the supporting Phase 1: Environmental Risk Assessment prepared by RPS Group.

The Environmental Health Department at the Council advised that the site has not been identified for further assessment under the Councils Contaminated Land Inspection Strategy.

There is the potential for a degree of contamination to be present beneath the site as a result of its current and historical use as a warehouse and also the potential for the migration on to the site of off-site contamination (if present) from the former Works located 10m to the west. However, onsite land uses have been small scale in nature and are considered unlikely to have given rise to significant contamination beneath the site and the presence of hardstanding and building cover on site will also have reduced the potential for the leaching of any historical spillages/leakages of contaminants into the underlying ground or shallow groundwater.

Furthermore, RPS understands that the predominant building cover and hardstanding is proposed to remain and that no ground break or areas of soft landscaping are proposed. This will significantly limit the potential for future site users to come into contact with any residual contamination (if present) beneath the site by severing the dermal contact and ingestion pathways.

Sensitive groundwater resources situated at depth beneath the site will be offered a significant degree of protection by the presence of low permeability London Clay underlying the site.

Overall, the site is considered to be suitable for its proposed use from a ground contamination perspective. No further work is required to ground conditions / contamination at the site, based on its current use and form.

In light of the above, the change use will have no impact in terms of contamination, and the proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class P.

### iv. Flooding Risks in Relation to the Building

Please refer to the supporting Flood Risk Assessment prepared by RPS.

This assessment has considered the potential risks to the application site associated with flooding from fluvial and tidal sources, sewer surcharging, surface water (pluvial) flooding, groundwater flooding and flooding from other (man-made) sources. Overall, on the basis of information reviewed by RPS, the subject site is not considered to be at a significant risk of flooding from any of the sources assessed.

The development is considered to be safe from a flood risk perspective, and will not result in an increase in flood risk off-site.

No further assessment or mitigation is considered necessary in relation to flood risk for the Permitted Development application.

In light of the above, the change use will have no impact in terms of flood risk, and the proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class P.

## v. Noise Impacts of the Development

Please refer to the supporting Noise Report prepared by Sharps Redmore.

Given the overall reduction in noise levels and existing ambient and background levels in the area, this development will have negligible impact on the surrounding area and consequently would not require prior approval for the impacts of noise.

Residential dwellings already exist in proximity to the proposal. Following an attended and unattended site survey, it is considered that noise from the proposal will not give rise to adverse noise impacts from the use The Warehouse for residential purposes.

Consideration has been given to a condition requiring an appropriate glazing specification to enable appropriate internal levels to be met to provide a desirable standard as per BS8233:2014. Whilst not part of the PD process, a glazing specification to deal with transport noise in the area to meet these standards is considered appropriate.

As stated in National Planning Practice Guidance, “prior approval is a light-touch process which applies where the principle of the development has already been established”. In this case, it is considered that The Warehouse could be permitted to change to residential end use (Planning Use Class C3) and will not cause significant harm from adverse impacts on health and quality of life of future residents in accordance with the policy aims of the National Planning Policy Framework (NPPF paragraph 123), NPSE and local policy.

In light of the above, the change use will have negligible impact in terms of noise, and the proposal compiles fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class P.

## vi. Where the authority considers the building to which the Development relates is located in an area that is important for providing storage or distribution services or industrial services or a mix of those services, Whether the introduction of, or an increase in, a residential use of premises in the area would have an adverse impact on the sustainability of the provision of those services

Paragraph 51 of the National Planning Policy Framework states: “*Local planning authorities should ... normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.*”

The unit is not specifically designated within an employment area and is not considered particularly important when considered against the locational strategy for storage and distribution uses. It is not considered that the change of use would have a detrimental impact on storage or distribution uses in the locality or the strategic approach to the location of such. There is also evidence of residential use in close proximity.

The Council's property market assessment shows that many of Richmond's industrial sites are constrained, often hemmed in by housing or requiring access via residential areas, thereby reducing their attractiveness to some industrial occupiers.

## vii. Other Material Considerations

The unit is below the 500m<sup>2</sup> of warehouse (B8) floor space.

The Council's Pre-App Reponse dated 26 February 2014 refers to the use as a warehouse (B8). A copy can be found in the supporting Transport Statement, Appendix C. The Applicant is also paying commercial rates for warehousing.

The site is not located on Article 4 Direction Land.



## 7. CONCLUSIONS

For the reasons set out above, the proposed change of use to residential will have no adverse impact in terms of highways and transport, flood risk, ground contamination or flooding and is not specifically designated within an employment area and is not considered particularly important when considered against the locational strategy for storage and distribution uses. It is, therefore, clear that the proposal complies fully with The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015, Class P and constitutes permitted development.

I trust this letter is satisfactory for the registration and validation of the application and I look forward to receiving an acknowledgement of this letter shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,



**James Lloyd** B.Sc (Hons) M.Sc TCP MRTPI  
Managing Director