

Lockcorp House 75 Norcutt Road Statement of Community Involvement



On behalf of Leek Real Estate (No1) Ltd and
Paragon Asra Housing Ltd
September 2019



CONTENTS

1. INTRODUCTION	2
2. POLICY FRAMEWORK	3
3. SUMMARY OF PROPOSED APPLICATION	5
4. THE CONSULTATION PROCESS	6
5. THE RESPONSE TO THE CONSULTATION	9
6. SUMMARY AND CONTINUED CONSULTATION.....	10
APPENDICES	11

1. INTRODUCTION

This Statement of Community Involvement has been compiled by specialist community consultation group Your Shout, part of Thorncliffe, on behalf of Leek Real Estate (No.1) Ltd & Paragon Asra Housing Ltd (the joint applicants). This report supports a planning application for 15 apartments with 12 parking spaces which will be 100% affordable housing.

This report details the public consultation the applicant has undertaken in order to inform the evolution of the proposals. Consultation has been carried out in accordance with national and regional policies, as set out in the following section of this report, and exceeds the requirements of London Borough of Richmond upon Thames current Statement of Community Involvement (adopted June 2006).

The key aims of the pre-application stage of public consultation, which this report demonstrates, are:

1. To inform local residents, businesses, councillors and other stakeholders about the redevelopment aspirations for the site.
2. To gain a full understanding of local views of the proposals, engage with the local and wider community throughout the design development stage, and use these views to identify concerns and opportunities; and where possible inform the evolving final proposals.
3. To demonstrate how the applicant has responded to the issues raised by the community and stakeholders and identify how changes have been made to the proposals to address them.

In addition, this report demonstrates the applicant's continued commitment towards consultation and engagement throughout the statutory planning process.

2. POLICY FRAMEWORK

National Context

Pre-application consultation has long been seen as a positive process and a key part of ensuring local communities have a say in proposed developments.

The 2019 revised NPPF calls for pre-application engagement and front-loading, stating that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for everyone. The revised NPPF states that “Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.” (p. 13)

Applicants undertaking major developments can carry out pre-application consultation, by:

- Publicising the proposal and consulting with residents in the vicinity of the site concerned.
- Giving local people an opportunity to comment when there is still scope to make changes to proposals.
- Taking account of responses to the consultation.
- Having regard to the local planning authority about local good practice.

It is also best practice to consult stakeholders and the local community on all significant developments before a planning application is submitted.

As part of this consultation, we have consulted councillors. ‘Probity in Planning’ from the Planning Advice Service and Local Government Association, formally endorsed by the Ministry of Housing, Communities and Local Government (MHCLG) says, “Now, through the Localism Act and previously the Audit Commission, the LGA and PAS recognise that councillors have an important role to play in pre-application discussions, bringing their local knowledge and expertise, along with an understanding of community views. Involving councillors can help identify issues early on, helps councillors lead on community issues and helps to make sure that

issues don't come to light for the first time at committee. PAS recommends a 'no shocks' approach."

London Regional Context

This consultation also meets the consultation approach outlined in the Mayor of London's 'London Plan'. "The Mayor ... recognises that community and voluntary groups, local business organisations and other interest groups have particular contributions to make to planning decisions, plans and strategies to shape neighbourhoods and will support their involvement. In the same way, the Mayor supports approaches to planning, regeneration and development that harness the knowledge, commitment and enthusiasm of local communities, enterprises and other groups."

Local Context

LB Richmond Statement of Community Involvement (adopted 2006)

"The approach will vary according to the developer or landowner, but the Council encourages pre-application discussions and community involvement from the outset. Seeking community views on the acceptability of proposals, especially before an application is finalised, strengthens people's ability to exert influence and provides an opportunity for problems to be ironed out, thus reducing the potential for later confrontation. There is however a need to recognise and maintain the distinction of the roles and responsibilities of the applicant on the one hand and the local planning authority representatives on the other. For this reason, Council officers generally leave developers to pursue their own methods of consultation at this stage, using their own resources, so that officers can remain at 'arm's length' from discussions, meetings, exhibitions and information distribution. Officers will, however, ask for feedback on how pre-application consultation has been conducted and what the outcome has been. Whether prospective applicants embark on community involvement at this stage or not, officers recognise the importance of respecting a developer's confidentiality, especially where this concerns commercially sensitive information."

3. SUMMARY OF PROPOSED APPLICATION

The current site

The site lies at the northernmost end of Norcutt Road within the South Twickenham Ward and adjacent to the railway line running between Twickenham and Strawberry Hill and Whitton. It is accessed via a narrow, predominantly residential street characterised by Victorian terraced houses. The application site itself forms a trapezium shape and comprises an area of 0.072ha. To the east of the site is an electricity sub-station, which is accessed via Warwick Road, falling within the Hamilton Road Conservation Area.

To the west is the former Gregg's Bakery site accessed via Crane Road and to the north, beyond the railway line, is land designated as Metropolitan Open Land (MOL) at Twickenham Rifle Club. Other constraints/designations include:

- Brownfield Land
- Industrial Land / Business Park
- Key Office Area
- Land Use Past Industrial.

The proposals

The scheme proposes 15 flats in a part four / part five storey building on the former commercial site. 100% of the homes will be shared ownership. The site will include 12 car parking spaces.



Figure 21 - Proposed front elevation

4. THE CONSULTATION PROCESS

The consultation process for this scheme exceeds the requirements of the Council's Statement of Community Involvement.

Specifically, we have:

1. Made sure the consultation takes place as early as practically possible in the design development process, and is therefore 'front-loaded'.
2. Conducted appropriate engagement that fits the community's needs.
3. Used Plain English and adequate response mechanisms.
4. Explained clearly what the scope of the consultation is, and what can and cannot be changed.
5. Analysed the results from the consultation objectively.
6. Publicised collective responses, with due regard to the Data Protection Act and General Data Protection Regulations.
7. Summarised how these responses have affected the proposals.
8. Ensured feedback, analysis and our response is available to the public and consultation participants.

Timeline of Consultation

May 2019	First consultation letter sent to local residents
June – July 2019	Amendments made to proposed development
August 2019	Second consultation letter sent to local residents

Pre-application discussions with planning officers

A pre-application meeting was undertaken with London Borough of Richmond upon Thames on 14 March 2019. Discussions have been ongoing for the duration of the pre-application period. Since then the design of the

scheme has been refined. Detailed information about this process and the evolution of the design is included in the Design and Access Statement.

Pre-application meetings with Councillors

We contacted by phone all three ward councillors: Cllrs Michael Butlin, Katie Mansfield, and Richard Bennett, and either spoke to them or left messages.

We will continue to update these councillors by phone or email as the planning application progresses.

Letters to residents

We sent information letters to local residents detailing the scheme and allowing them to respond with their comments. We distributed approximately 88 copies of the letters, which were hand delivered. The first letter was sent out in May 2019. The information letter is included in **Appendix 1**.

A further letter, summarising changes made to the proposals in response to the consultation, was delivered in August 2019. This letter is included in **Appendix 3**.

The letters were also sent to the three ward councillors detailed above.

Using appropriate response channels

We have maintained, and continue to maintain, several response mechanisms for the local community and stakeholders to give their feedback and comments about the scheme, including:

- A freephone number, staffed during office hours: 0800 955 1042
- A bespoke email address: norcutt@yourshout.org

Feeding-back to participants and the wider community, and opportunities for continuing involvement

One of the main objectives of this Statement of Community Involvement is to help record individual and collective responses to the proposals and how these responses have affected our proposals.

This report also allows us to feed back this information, in a more readily digestible form to the local community, respondents, other stakeholders and councillors.

This Statement of Community Involvement will be made available, alongside other planning documents, as part of the planning submission to the London Borough of Richmond upon Thames.

The freephone and email address will all be maintained until the planning application is determined by the local planning authority.

We remain committed to keeping in touch with all those that have participated throughout this consultation exercise. We will be available to meet consultees again as appropriate.

5. THE RESPONSE TO THE CONSULTATION LETTERS

Three people have responded to the information letters. Their comments are included in Appendix 2.

Applicant's response table

Issue	Qualitative response	Applicant's response	No of responses
Height and car parking	"... proposal for social/affordable housing is a definite improvement on the previous plan for a 48 student block, I am still concerned about the size and height of the building... I would also request clarification as to how you will determine who would be entitled to one of the eight parking spaces out of the sixteen units?"	This proposal is for a building adjacent to the existing block of flats at Alcott House which is smaller and lower than the current consented scheme. The number of parking spaces has increased to twelve.	1
Car Parking	"How many actual parking spaces?"	There will be twelve spaces.	3

6. SUMMARY AND CONTINUED CONSULTATION

The applicant has undertaken public consultation to ensure local stakeholders have had an opportunity to comment on the emerging proposals in advance of submission.

A list of key stakeholders has been put together to ensure that all interested parties have been kept informed of the plans and given a chance to ask questions and give feedback. This list included, but was not limited to, stakeholder groups that were suggested by LB Richmond planning officers. Where information has been requested, it has been supplied in an easy to understand way.

Overall, the response to the consultation has been positive with the main issues highlighted by consultees including height and car parking. In response to feedback received, the applicant has made a number of changes to the scheme, including a significant increase in the number of car parking spaces from 8 to 12 and also a reduction in the number of homes from 16 to 15. Affordable housing provision was raised from 55 per cent to 100 percent.

This Statement of Community Involvement fully demonstrates the applicant's commitment to thorough and meaningful public consultation and meets the requirements set out by the London Borough of Richmond upon Thames. The submission of the planning application does not mark the end of this consultation and the Applicant will continue to meet with local groups and individuals as appropriate throughout this process.

September 2019



Appendix 1: First information letter to residents



Dear Neighbour

We are writing to you in relation to Lockcorp House, the former commercial site at the northern end of Norcutt Road.

As you may know, the building has been empty for some time and is no longer suitable for use.

In May 2018, planning permission was granted for a new part four, part five-storey building on the site of Lockcorp House comprising 49 student study/bedrooms along with three parking spaces.

Our clients Leek Real Estate, the owners of the site, are preparing to make a planning application to Richmond Borough Council for an alternative, non-student building. The proposals are currently being worked on and are likely to include the following:

- 16 residential apartments, with no student accommodation.
- A significant amount of affordable housing. Discussions are continuing with local providers to determine the maximum amount of affordable housing that can be viably provided.
- Additional parking spaces, with eight on-site car parking spaces. Residents of the completed building would not be allowed to receive parking permits for any local roads.
- A smaller, less bulky building than the student building granted permission last year with a more sympathetic design that is more in keeping with local buildings.

On the other side of this letter you can see an illustration of how the completed building could appear and a comparison between the proposed building and the student accommodation granted planning permission last year.

Neither Leek Real Estate nor any of the parties involved in this proposal are connected with the separate application for the former Greggs site.

If you would like to know more, please don't hesitate to get in touch. You can call us on 0800 955 1042 or email us on Norcutt@yourshout.org.

Yours sincerely,

Matt Harmer

On behalf of Leek Real Estate.

T 020 7587 3049 | yourshout.com

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Here, you can see a comparison between the proposed building and the approved student application.



Proposed Scheme



Previously Approved Student Scheme

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Appendix 2: Comments from consultation

Postcode (where given)	Comments (transcribed verbatim with personal details excluded, notes of calls indicated in []) Some consultees returned comment cards with the quantitative response boxes ticked (results shown in sect. 5) but <i>without</i> providing any written comments.
TW2 6SR	<p>Today I have received an initial planning application for the demolition of Lockcorp House in view to the development of the site. Although your proposal for social/affordable housing is a definite improvement on the previous plan for a 48 student block, I am still concerned about the size and height of the building. No doubt because planning permission was granted, even after it went to appeal, the residents of Norcutt Road will be dismayed at this new building dwarfing the existing flats and houses in what is a family orientated and Victorian Road.</p> <p>You state a smaller, less bulky building than the student building but to my eyes there is no difference in scale.</p> <p>I would also request clarification as to how you will determine who would be entitled to one of the eight parking spaces out of the sixteen units? Also, because there are no detailed drawings at present it is difficult to raise further queries in respect of landscaping, outside space etc.</p> <p>In view of putting myself forward as a spokesperson for Norcutt Road I have BCC'd this email to several of the residents and hope to gain their feedback.</p> <p>I look forward to hearing from you in due course.</p>
	<p>We would also be interested in the response to xxxxxx's questions as we have similar concerns (also residents on Norcutt Road). We are particularly interested in the point raising the allocation of the limited parking spaces proposed for the development and the provisions made for those properties without parking as Norcutt Road and surrounding streets are included in a CPZ.</p>
	<p>How many actual parking spaces? This will be very important to local residents they expect at least a one for one. (Note the restriction on CPZ is not that significant if you leave before 8.30am and return after 6.30pm)</p> <p>Local residents expect to receive images of what to expect</p>

Appendix 3: Second information letter to residents



Dear Neighbour

We are writing to you again to update you in relation to Lockcorp House, the vacant former commercial site at the northern end of Norcutt Road. Since we last wrote to you, we have listened to the issues that have been raised and have amended our proposals accordingly.

You may recall that planning permission has already been granted for the demolition of the building and its replacement with a building to provide for 49 student bedrooms and three parking spaces.

Our clients Leek Real Estate have entered into a partnership with Paragon Asra Housing, an award-winning local provider of quality affordable homes. Since we last wrote to you the proposals have changed in the following ways:

- The number of proposed apartments is reduced by one from 16 to 15.
- The number of proposed parking spaces has been increased from 8 to 12.
- All of the development will be affordable housing, offering homes for shared ownership for local people.

This will enable first-time buyers to join the property ladder by taking a share of the ownership in their new apartment. This will provide an important addition to the supply of affordable housing in Richmond

The proposed building will be a smaller and less bulky than the student building granted permission last year with a more sympathetic external design and appearance that is more in keeping with local buildings than the consented student scheme.

Richmond Council asked the team to examine the potential for further commercial use of some or all of the site. It is felt that proposals of this kind would not be a sympathetic or appropriate use of the site and could result in increased disturbance for residents especially in terms of increased commercial vehicle activity on Norcutt Road.

Again, as previously stated neither Leek Real Estate, Paragon Asra Housing nor any of the parties involved in this proposal relate to the separate application for the former Greggs site.

A planning application for the vacant site will shortly be made to the London Borough of Richmond.

If you would like to know more, please don't hesitate to get in touch. You can call us on 0800 955 1042 or email us on Norcutt@yourshout.org.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matt Harmer', written over a light blue horizontal line.

Matt Harmer

On behalf of Leek Real Estate.

T 020 7587 3049 | yourshout.com

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Proposed new apartments



Previously Approved Student Scheme

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Lockcorp House

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